

# Office for Victims of Crime

## VOCA Administrator Regional Meeting | SUMMARY

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<b>MEETING DATE</b>	June 20, 2018
<b>MEETING LOCATION</b>	Salt Lake City, UT
<b>MEETING CALLED BY</b>	Marilyn Roberts, OVC Deputy Director
<b>TYPE OF MEETING</b>	VOCA Administrator Regional Meeting
<b>TOPICS</b>	Innovative Programs; Monitoring of VOCA Subrecipients; and Challenges
<b>PARTICIPANTS</b>	VOCA Administrators: Malgorzata Bereziewicz (IL); Suzanne Breedlove (OK); Melissa Ewer (NM); MayBeth Gagnon (AK); Lisa Harrison-Lineback (OK); Debbie Kayson (CO); Kimberly Lax (LA); Kate Lyon (AZ); Janelle Melohn (IA); Christie Machin Ramirez (PR); Mike Maryanov (OR); Kelsey McCann-Navarro (NV); Kelly McIntosh (MT); Jennifer Peters (TN); Jason Petry (WY); Stephanie Pierson (SD); Gary Scheller (UT); Leonard Seumanutafa (AS); Rima Spight (HI); Christine Watters (UT); Linda Watts (UT).
<b>PRESENTERS:</b>	John Mahoney (VA); Kate Lyon (AZ); Suzanne Breedlove (OK); Christine Watters (UT); Lucy Mungle (OJP); Michael Maryanov (OR)
<b>OVC PERSONNEL:</b>	Darlene Hutchinson (OVC Director) and Marilyn M. Roberts (OVC Deputy Director)
<b>FACILITATOR:</b>	Mary Vail Ware (OVC TTAC)
<b>ATTENDEES IN PERSON:</b>	Diane Alexander (OVC TTAC); Marti Kovener (OVC TTAC); Jennifer Shewmake (OVC TTAC); Steve Derene (NAVAA).
<b>ATTENDEES BY PHONE:</b>	Kathy Buckley (Council of State Governments); Shelby Crawford (OVC Program Manager); Heidi Fam (OVC TTAC); Adrian Wilairat (OVC Writer-Editor)

### **WELCOME, OVERVIEW, AND INTRODUCTIONS – DARLENE HUTCHINSON, OVC DIRECTOR, AND MARILYN ROBERTS, OVC DEPUTY DIRECTOR**

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Darlene welcomed participants attending in person and on the phone.

- Yesterday, Marilyn and I observed the Utah consensus meeting regarding subawards. It was a great opportunity to observe how decisions are made.
- As you know, the Fiscal Year 2018 appropriation cap is higher than it has ever been. This is wonderful for grantees and victim services, but we realize that this will increase challenges with monitoring.
- Continue to reach out to OVC grant managers and staff with your questions.

- We look forward to seeing you and your colleagues at the VOCA Annual Training Conference in August in Savannah.

Marilyn welcomed participants:

- The main purpose of the regional meetings is to provide VOCA Administrators with useful information, to facilitate interaction among administrators, and to provide a forum for OVC to listen to feedback and understand the needs and concerns of VOCA administrators.
- Remember to check the VOCA Administrator section of the OVC website, <https://www.ovc.gov/VOCA-Administrators.html>, regularly. The page has information you should find useful. We created this one-stop shop to avoid inundating you with emails.

## **MONITORING/INNOVATIVE PROGRAMS PEER SURVEY RESULTS, JOHN MAHONY, VOCA ADMINISTRATOR, VIRGINIA DEPARTMENT OF CRIMINAL JUSTICE SERVICES**

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John provided an overview, via conference call, of the survey he conducted of VOCA Assistance Administrators. For more details, please see Attachment A.

- Survey of VOCA Assistance Administrators
  - To yield input on funding of new VOCA projects and efforts to monitor compliance.
  - Goal to identify positive trends and emerging needs.
  - Distributed via VOCA listserv.
  - Survey available at <https://www.surveymonkey.com/r/TLL62QG>.
  - Survey results available at <https://www.surveymonkey.com/results/SM-HGWSNDBVL/>.
- Why did Virginia conduct this survey?
  - John realized that VOCA Administrators want to comply with VOCA monitoring requirements and wanted to find ways to help everyone improve compliance.
  - John also was curious about innovative programs in other states and the potential for replicating them in Virginia. Which types of projects are needed and which have the most successes?
- Programmatic and Financial Monitoring
  - Survey asked if staff were responsible for both programmatic and financial monitoring.
  - Results: slightly more than half of respondents were responsible for both, while slightly less than half were not (i.e., these duties were handled by other staff).
  - VOCA agencies surveyed employ between 2 and 10 FTEs, with 44 to 843 subgrantees.
  - The average number of FTEs conducting onsite monitoring and compliance is 4.
- Importance of Improving Compliance
  - Most of those surveyed answered that improving compliance was 'extremely important,' while others said it was 'very important.'
  - Most of those surveyed answered that receiving training on assessing subgrantee compliance was 'extremely important,' while others said it was 'very important.'
  - Some of those surveyed answered that receiving an onsite monitoring tool was 'extremely important,' while others said it was 'very important.'

- Almost everyone surveyed answered that they have developed VOCA monitoring plans and policies.
- Funding New Projects
  - The survey indicated that states on average used approximately a quarter of this year's VOCA funding to support new projects.
  - New projects support:
    - Legal services
    - Human trafficking
    - Transitional housing
    - Culturally specific services
    - Geographically isolated populations
    - Victims of homicide
    - Immigrants
    - LGBTQ communities

Discussion:

- States need more subgrantee monitors.
- Many states have personnel who are program experts but do not have experience with financial monitoring.
  - Other states have financial experts who do not have any programmatic experience.
- What is the key to recruiting new monitoring staff?
  - States should focus on people who both understand the financial and programmatic requirements.

**STATE ADMINISTRATOR PRESENTATIONS ON INNOVATIVE PROGRAMS SUPPORTED THROUGH VOCA VICTIM ASSISTANCE FORMULA GRANT FUNDING, PRESENTATION 1: KATE LYON, PROGRAM ADMINISTRATOR, VOCA ADMINISTRATION, ARIZONA DEPARTMENT OF PUBLIC SAFETY**

Kate provided an overview of the Purple Ribbon Council to Cut Out Domestic Abuse (known as Bloom 365)'s innovative program called Bloom It Up for Teens: Outreach, Advocacy and Peer Support. For more details, please see Attachment B.

- Bloom 365 has a track record of collaborating with schools, domestic violence advocacy organizations, law enforcement, youth organizations, and city governments.
- The program's mission is to empower teen victims of dating abuse through peer-guided outreach to enhance their safety, physical and emotional well-being, and healing.
- The program sought to address obstacles teens face in seeking help to increase safety, physical and emotional well-being, and healing.
  - Abusive relationships can lead to violence and cause teens to be at risk for physical, emotional, and social problems.
  - The program found that 70% of teens are involved in romantic relationships, and that 33% of teens experience abusive and violent relationships.
  - The program found indicators of coercion and control, with few teen-focused services.
- Since the project's launch in 2013, it has provided information, referral and advocacy services to over 18,000 teens.

- Staff:
  - 4 FTEs: 2 youth advocates, 1 outreach advocate, and 1 volunteer coordinator.
  - Peer Advocates: 25 volunteers working an average of 10 hours per month.
  - Additional personnel: counselor and clinical supervisor, counseling intern, and healing arts therapist.
- Results:
  - Every participant reported that she or he felt believed and not alone.
  - Most participants reported that they knew how to access resources to meet their emotional and safety needs
    - In the first quarter of 2018, nearly 500 teens anonymously disclosed that they experienced victimization.
    - These teens were provided support services including: safety planning information on victim's rights and restraining orders, referral to community resources, crisis counseling, ongoing individual advocacy sessions, and group support.
    - 15 teens were trained as Peer Advocates.
  - Most participants reported that their support system had increased.
  - Most participants stated that their well-being had improved.
- Going forward:
  - Review school policies and provide recommendations to partner schools.
  - Coordinate quarterly training and in-service workshops on victim advocacy for school administration, counselors, and staff.
  - Develop coordinated community response teams in each school district to involve people who interact with teens, including school personnel, parents, domestic violence advocates, health care providers, religious leaders who work with youth, law enforcement, and behavioral health professionals.

**STATE ADMINISTRATOR PRESENTATIONS ON INNOVATIVE PROGRAMS SUPPORTED THROUGH VOCA VICTIM ASSISTANCE FORMULA GRANT FUNDING, PRESENTATION 2: SUZANNE BREEDLOVE, DIRECTOR OF VICTIM SERVICES, DISTRICT ATTORNEYS COUNCIL**

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Suzanne provided an overview of how Oklahoma uses VOCA to fund innovative programs. For more details, please see Attachment C.

- Oklahoma District Attorneys Council conducted regular meetings with stakeholders to identify unmet needs.
- The Council conducted outreach to solicit applications for VOCA funding:
  - The Council discussed the applicability of the VOCA Assistance Rule.
    - All allowable costs under the Rule were considered.
  - The online application was changed significantly due to the increased funding and the VOCA Assistance Rule.
    - The Council added two new questions to the application:
      - 1) What was the impact of increased VOCA funding for the project?
      - 2) What was the positive impact of VOCA funding in the community?

- Applicants provided inspiring examples of the positive use of VOCA funds to serve victims. The Council conducted targeted outreach to the 38 Indian tribes headquartered in Oklahoma and Legal Aid.
  - Absentee Shawnee Tribe used VOCA funding to support its domestic violence program. The tribe stated that without VOCA funding, it would not have been able to provide transitional housing to victims.
  - Otoe-Missouria Tribe, Ponca Tribe, and Eastern Shawnee Tribe used VOCA funding to address gaps in services, including counseling, legal assistance, transitional housing, emergency relocation, and other emergency services.
  - University of Oklahoma used VOCA funding to support Children’s Advocacy Centers and Multidisciplinary Teams, enabling a child abuse pediatrician to travel to areas without trained medical providers to train local pediatricians on conducting victim-centered child abuse examinations.
  - The Native Alliance Against Violence used VOCA funding to provide AI victims with culturally specific legal services.
  - Legal Aid used VOCA funding to expand delivery of services, including embedding attorneys in domestic violence programs.
- Tribal Outreach Project
  - Oklahoma conducted a tribal outreach project through an OVC-funded grant several years ago.
  - The tribal liaison under this project was able to make great inroads with tribes, which helped make subsequent outreach and VOCA projects easier to facilitate and more successful.

Discussion:

- Multiple states asked if OVC could extend application deadlines for its open solicitations.
  - The tight deadlines this year have made it difficult for some to apply.
  - One program wanted to apply for trafficking funding, but there was not enough time for it to establish partnerships for law enforcement coalitions.
- Several states thought that using VOCA funds to support attorneys was very successful.
  - One benefit is that VOCA-funded attorneys working with law students are able to recruit them into victim-rights law.
- Oregon sets aside a certain amount of assistance dollars each year to support tribal programs.
- Several states asked about the tribal set-aside solicitation.
  - It is divided into 2 phases.
  - The application will be streamlined, i.e., require less paperwork than usual.
  - The set-aside program solicitation likely will be open for 45 days.
    - Some states thought that the short turnaround will make it difficult for tribes to apply.

Christine provided an overview of the Utah Office for Victims of Crime's innovative approaches to working with underserved communities. For more details, please see Attachment D.

- Identify outreach strategies for working with underserved populations:
  - Build trust, meet diverse audiences, and travel to communities.
- Utah identified victim needs and implemented new programs:
  - Needs assessment identified a critical need for housing.
  - Contacted other states for input and visited Washington and Colorado.
  - Identified key features of a model housing program.
    - Released a \$2.5 million Utah Housing First RFP that will begin this summer.
- Conducted outreach to community groups
  - Provided \$1.5 million to 10 Children's Justice Centers to provide trauma-informed assessment and treatment.
  - Conducted 3 meetings with legal services providers throughout Utah.
    - Identified ways to expand legal services under VOCA Assistance Rule.
    - Increased funding for existing VOCA-funded legal services.
  - Met with multiple law enforcement agencies, domestic violence shelters, and rape crisis centers.
  - Traveled throughout Utah to meet with underserved communities, including LGBTQ groups, refugees, Hispanic groups, and polygamist populations.
- Engaged with communities by:
  - Listening to their histories of marginalization and mistrust.
  - Discussing issues openly and encouraging collaboration.
  - Making efforts to protect rights and well-being of these communities.
- Two underserved communities that the Utah Office for Victims of Crime focused on were polygamous communities and tribal communities.
- Cherish Families is a nonprofit organization that supports victims from polygamous families and communities.
  - The founders are former members of the Fundamentalist Church of Jesus Christ of Latter-Day Saints (FLDS Church), which practices polygamy.
    - Utah has a large polygamous population.
  - The Utah Office for Victims of Crime visited Colorado City and the surrounding area.
  - The area is isolated. State lines blur and it is hard to tell whether you are on or off the FLDS community.
    - These factors make serving victims more challenging.
  - In 2016-2017, the organization served over 250 victims.
    - Services included helping obtain protective orders, accompanying victims to court, serving victims of identity theft, conducting hate crime intervention and advocacy, and providing emergency food, clothing, and shelter.
- Innovative Initiative Focusing on Tribal Communities
  - Attend meetings with tribal leaders, visit tribal communities, and attend community events, such as Pow-Wows.
  - There are approximately 60,000 American Indian (AI) individuals in Utah, including Navajo Nation, Ute Indian Tribe, and Paiute Indian Tribe of Utah.

- Utah Navajo Health System
  - Program began on January 1, 2016, and has gradually increased the number of victims served and number of services provided.
  - Provides comprehensive direct victim assistance, including advocacy, emergency shelter, and information and referrals for all victims, including victims of child abuse, sexual assault, domestic violence, and survivors of homicide.

Discussion:

- Subgrantees often find the match requirement challenging.
  - Small non-profit organizations find the match requirement particularly difficult.
- Organizations can request match waivers.
  - OVC has received more requests for match waivers in recent years.
  - Match waiver requests can be for either total match waiver or partial.
  - OVC understands the need for match waivers and tries to grant them when possible.
  - Think creatively to come up with matching funds.
- Each state approaches match differently.
  - Some states pay the match requirement.
- Marilyn noted that all subgrants using Fiscal Year 2015 funds must end by September 30<sup>th</sup>. Please remind your subrecipients of this requirement.
  - The year-of-award-plus-three requirement is statutorily mandated; the only way to extend the use of grant funds would be through a change to the statute.

**OVERVIEW OF THE OFFICE OF JUSTICE PROGRAMS' AND THE OFFICE FOR VICTIMS OF CRIME'S REQUIREMENTS TO MONITOR SUBRECIPIENTS AND THE OFFICE OF THE INSPECTOR GENERAL MONITORING RECOMMENDATIONS**

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Lucy Mungle, Policy Analyst, Office of Audit, Assessment, and Management, provided an overview of OJP monitoring requirements. For details of this presentation, please see Attachment E.

**STATE ADMINISTRATOR PRESENTATION ON MONITORING PRACTICES: SUZANNE BREEDLOVE, DIRECTOR OF VICTIM SERVICES, DISTRICT ATTORNEYS COUNCIL**

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Suzanne provided an overview of monitoring practices in Oklahoma. For more details, please see Attachment F.

- Suzanne recently hired a compliance officer.
  - The compliance officer is reviewing the paperless system to ensure personnel forms are submitted, audit reports have been obtained, and that other documentation is there.
  - This position is critical to ensuring that subgrantees are monitored.
  - Suzanne is considering hiring another compliance officer.
- Monitoring staff review all new competitive applications
  - This is a time-intensive process to carry out each year; it might be more efficient to make the grants last for 2 years instead of 1.
- After awards have been made, Suzanne's staff visit new programs.

- Oklahoma has adopted Michigan’s risk assessment model. The office uses this model to help determine which grantees they will visit first.
- Financial training
  - The office has annual mandatory training.
  - The office plans to create mini trainings on indirect costs and keeping good time sheets.
- TA – online grant management system.
  - Data collection
  - Compliance with civil rights requirements
  - Electronic Tracking of Monitoring Activity
- Oklahoma does not ask any stakeholders to assist with monitoring.
- Oklahoma keeps a ‘VOCA Binder’ for easy access to documents and records.

## **STATE ADMINISTRATOR PRESENTATION ON MONITORING PRACTICES: MIKE MARYONOV, GRANT MANAGEMENT SECTION MANAGER, CRIME VICTIM AND SURVIVOR SERVICES DIVISION, OREGON DEPARTMENT OF JUSTICE**

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Mike provided an overview of monitoring practices in Oregon. For more details, please see attachment G.

- Oregon staff are more skilled on the programmatic side, rather than monitoring.
- The increase in funding makes it more challenging to conduct monitoring.
- To address this gap, Mike is recruiting more staff, especially Fund Coordinators, a Policy and Special Project Coordinator, and Compliance Coordinator.
  - The office has 8 Fund Coordinators, who are assigned to Oregon’s 36 counties and manage all grants to programs in those counties.
  - Fund Coordinators manage the entire subaward process, including programmatic and fiscal monitoring.
  - They oversee over 300 subawards made to nearly 200 subrecipients.
- The many subawards and subgrantees makes it clear that the office needs help with fiscal monitoring.
- The Oregon Department of Justice’s Fiscal Services section helps the Victim Services Division with budgeting and payments, but not with monitoring.
- The Victim Services Division can work with the Oregon Sexual Assault Task Force for monitoring of VOCA funding to college campuses for services related to sexual assault.
- Fiscal monitoring is crucial because subgrantees have challenges with:
  - Keeping proper time sheets.
  - Adhering to rules on indirect costs and income.
  - Managing boards of directors and exercising oversight.

## **GROUP DISCUSSION: CHALLENGES AND BEST PRACTICES**

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Mary Vail Ware facilitated a group discussion about challenges states are having in monitoring subrecipients:

- States need more staff so that personnel can spend the necessary amount of time on monitoring.



- States need to build capacity to adequately monitor subrecipients.
  - Some states do not have grant writers in house.
  - Some states find it difficult to analyze their own data.
  - Some states are trying to increase geographic distribution of subgrants and their monitoring, which puts extra demands on staff.
- States are using VOCA funds to support services as comprehensively as possible, in compliance with the VOCA Assistance Rule, which could lead to compliance issues that have not yet been addressed.
- States need more direct guidance from OVC.
  - States should reach out to OVC TTAC for technical assistance, training, and other resources.
  - There are many free resources provided by several organizations online that states should use.
  - States need to exercise leadership, institutional knowledge, and use resources within their agencies and with government partners.
- States have challenges with budget authority (governors' offices), which makes it hard to plan.
  - OJP has a forecaster, i.e., a potential solicitation pipeline, available to the public online.
  - TTAC will send states a link to the forecaster.

Mary Vail Ware facilitated a group discussion about strategies for states to address these challenges:

- Seek and fund new programs that are innovative—innovation is encouraged.
- Establish cohort calls: monthly conference calls with other state VOCA offices to exchange ideas and share best practices.
- Conduct peer-to-peer mentoring.
- Connect VOCA subrecipients with technology and new tools to help with compliance.
- OVC should provide written requirements regarding match waiver to clarify the process.
- Use tools for match waivers.
- Build capacity of SAAs and subgrantees with regard to programmatic and financial monitoring.
- Observe responses and findings by OIG and address them.
- Take advantage of the many opportunities for TTA.
- Take the SAA staffing survey.

## CLOSING REMARKS

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- Darlene thanked participants for attending.
- Darlene noted that OVC had released many FY 2018 competitive solicitations.
  - The FY 2018 tribal set-aside program solicitation will post in the next few days.
- Darlene reminded participants that FY 2015 grant award funds have to be spent no later than September 30, 2018.

- Marilyn asked for feedback about how to make the meetings more effective and for ideas for future meeting topics.

# Monitoring/Innovative Programs Peer Survey Results

**JOHN MAHONEY**

*VOCA Administrator*

Virginia Department of Criminal Justice Services,  
Division of Programs and Services



# Survey of VOCA Assistance Administrators

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- ▶ Distributed via VOCAVA listserve
- ▶ Seeking input on: funding of New VOCA Projects and Compliance Monitoring efforts.
- ▶ Purpose: Identify positive trends and emerging needs etc.
  
- ▶ Take The Survey Here:
- ▶ <https://www.surveymonkey.com/r/TLL62QG>
  
- ▶ See Survey Results Here:
- ▶ <https://www.surveymonkey.com/results/SM-HGWSNDBVL/>



# Objective

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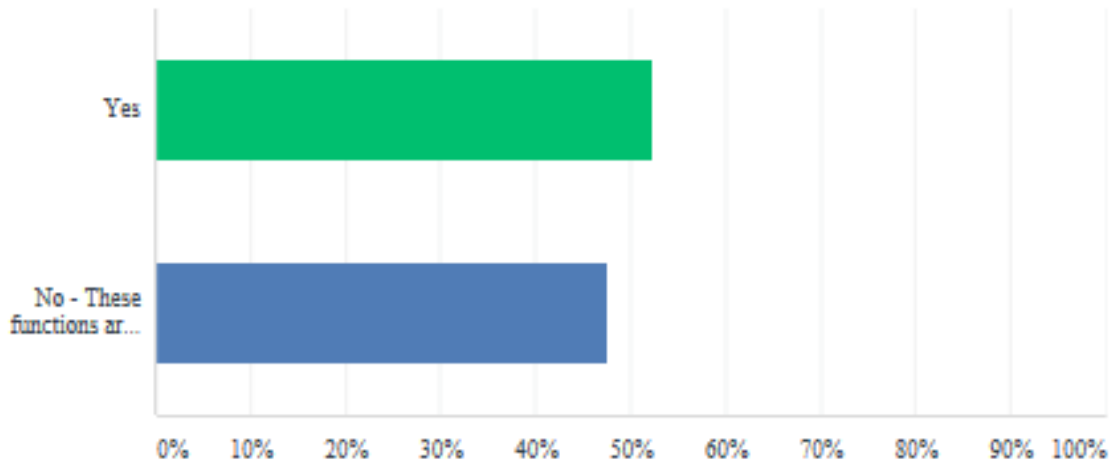
- ▶ Present data that helps:
  - ▶ You to put your work, and concerns, in context with those of your colleagues.
- ▶ Stimulate practical discussion –
  - ▶ What do we need to assess and improve “compliance?” What are the “right” compliance questions? What does compliance look like? How can we cover all the bases consistently and efficiently? Are we doing things right AND doing the right things?
  - ▶ What types of innovative projects are being funded? What types are needed? Which ones are making the greatest impact?



# Who Does Programmatic/Financial Monitoring?

Do these staff have BOTH CFR compliance and service delivery/programmatic technical assistance provision responsibilities?

Answered: 21 Skipped: 2



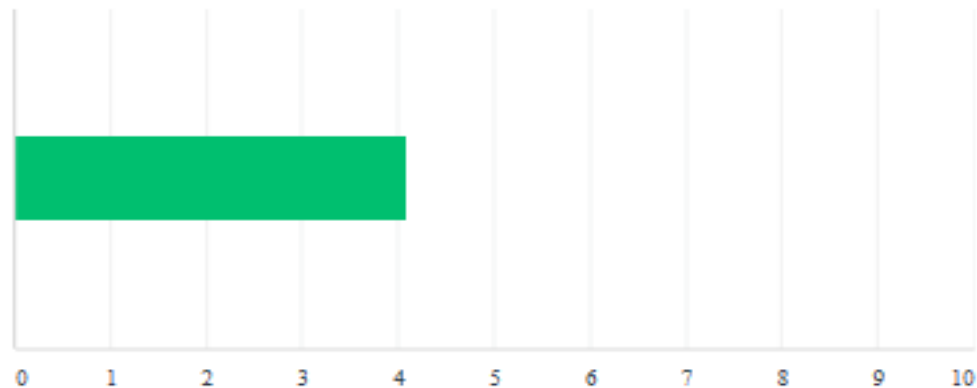
ANSWER CHOICES	RESPONSES	
- Yes	52.38%	11
- No - These functions are handled by separate staff	47.62%	10
TOTAL		21

# Monitoring – Staffing and Number of Subgrantees

- ▶ Range 2-10 FTE
- ▶ Range of Subgrantees 44-843

How many Full-Time Positions are conducting on-site monitoring and compliance reviews?

Answered: 21 Skipped: 2



ANSWER CHOICES	AVERAGE NUMBER	TOTAL NUMBER	RESPONSES
Responses	4	88	21

Total Respondents: 21

# SAA Needs to Improve Compliance

	EXTREMELY IMPORTANT	VERY IMPORTANT	MODERATELY IMPORTANT	SLIGHTLY IMPORTANT	NOT AT ALL IMPORTANT
Training for SAA's on assessing CFR compliance.	70.83% 17	29.17% 7	0.00% 0	0.00% 0	0.00% 0
Training for SAA staff on assessing subgrantee compliance with VOCA and other PROGRAMMATIC requirements.	64.00% 16	24.00% 6	12.00% 3	0.00% 0	0.00% 0
More SAA staff with auditing or CFR compliance monitoring expertise.	56.00% 14	32.00% 8	8.00% 2	0.00% 0	4.00% 1
More SAA staff to conduct on site monitoring of subgrantees.	52.00% 13	36.00% 9	8.00% 2	4.00% 1	0.00% 0
Training for SAA's on assessing CFR compliance.	70.83% 17	29.17% 7	0.00% 0	0.00% 0	0.00% 0





# Survey- Other Needed Compliance Tools

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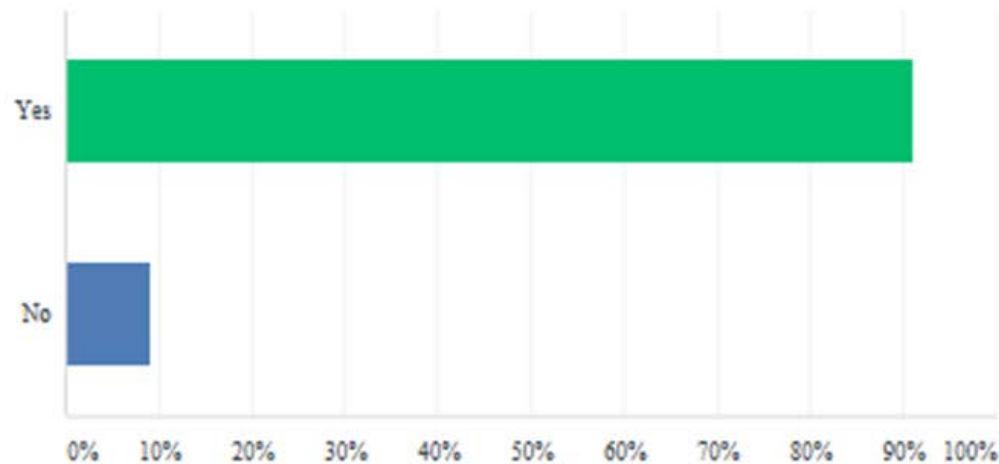
Tool/Topic	Extremely Important	Very Important
Recommended Desk Audit	48%	26%
Recommended On-Site Monitoring Tool	43%	43%
Recommended Scored Risk Assessment	43%	21%
Recommended Subgrantee Self-Assessment	17%	43%



# Monitoring Plan, Policy, Risk Assessment

Have you developed a VOCA monitoring plan and policy?

Answered: 22 Skipped: 1



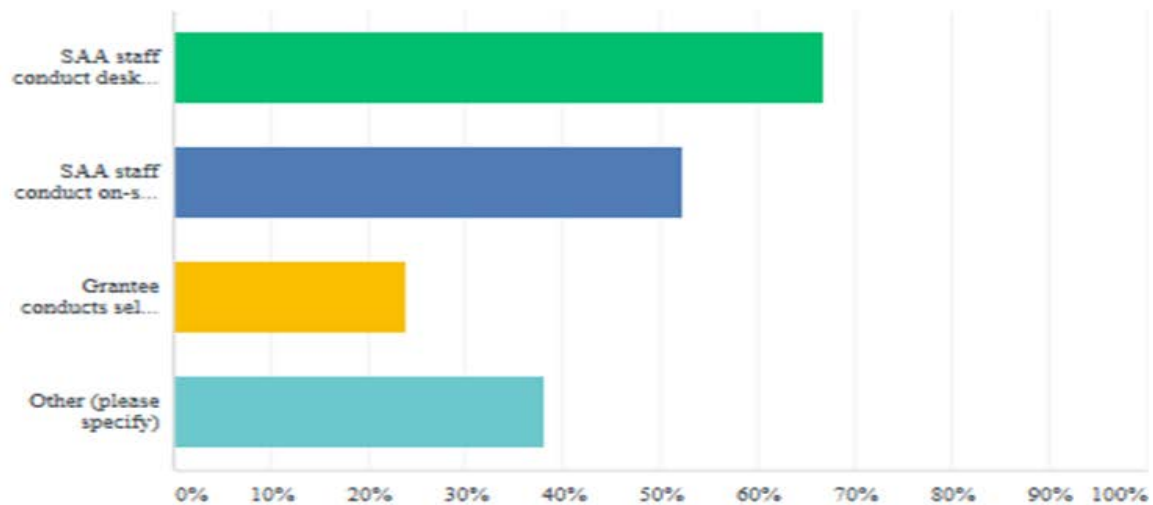
ANSWER CHOICES	RESPONSES	
- Yes	90.91%	20
- No	9.09%	2
TOTAL		22



# Risk Assessment

To complete the Risk Assessment, which of the following activities are required?

Answered: 21 Skipped: 2

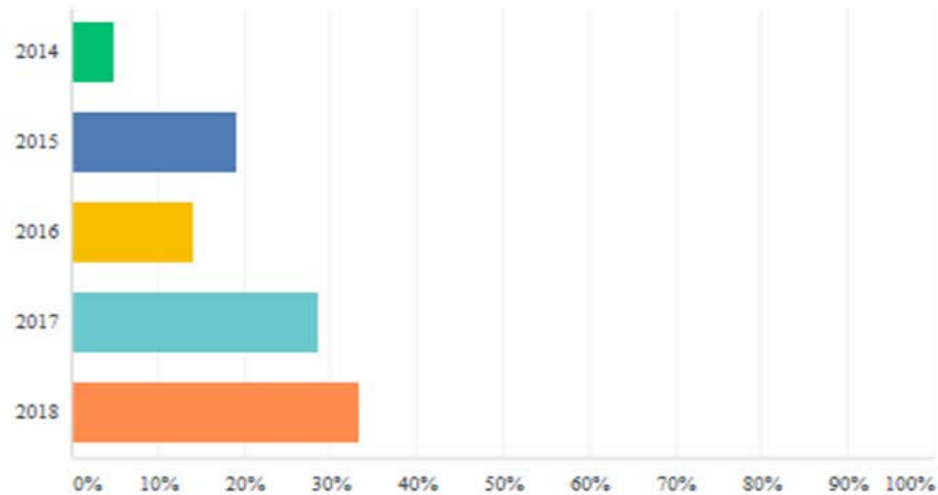


ANSWER CHOICES	RESPONSES	
- SAA staff conduct desk review	66.67%	14
- SAA staff conduct on-site review	52.38%	11
- Grantee conducts self- assessment	23.81%	5
- Other (please specify)	Responses 38.10%	8
Total Respondents: 21		

# Risk Assessment

When was (will) the scored risk assessment implemented?

Answered: 21 Skipped: 2



ANSWER CHOICES	RESPONSES	
- 2014	4.76%	1
- 2015	19.05%	4
- 2016	14.29%	3
- 2017	28.57%	6
- 2018	33.33%	7
<b>TOTAL</b>		<b>21</b>

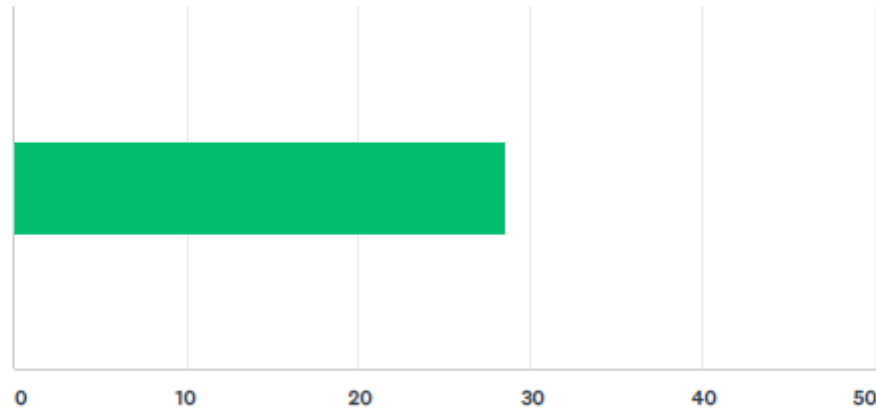


# Funding for New Projects

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Q2 This year, approximately what percentage of your VOCA award supports NEW PROJECTS?

Answered: 23 Skipped: 2



ANSWER CHOICES	AVERAGE NUMBER	TOTAL NUMBER	RESPONSES
	28	655	23
Total Respondents: 23			

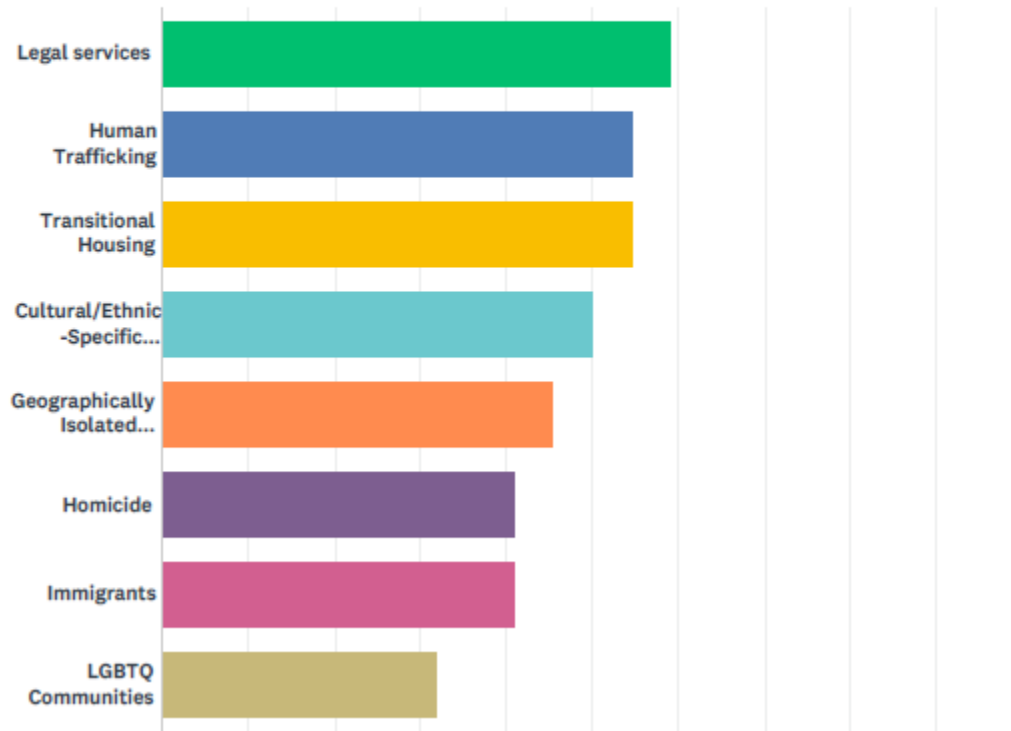


# New Project Focus

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Q3 Please check all that apply - Currently VOCA funds support NEW PROJECTS primarily addressing:

Answered: 22 Skipped: 3



# Innovative Project Types and Number States Funding

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Legal Services 12	Transitional Housing 12	Human Trafficking 11	Cultural/Ethnic Specific 10	Geographically Isolated 10
Homicide 9	Immigrants 8	Seniors 7	Teens/Youth 7	Justice Involved Youth 6
Victim Assistance in Jails and Prisons 6	LGBTQ Communities 6	SANE/FNE 6	Technology 5	Family Justice Center 5
Hospital Trauma Centers 5	Gang Violence 4	Urban Poor Communities 4	Individuals with Disabilities 4	Transportation 4

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# If I Had to Choose One NEW PROJECT With Greatest Impact, It Would Be:

Legal Services embedded in Domestic Violence/Sexual Assault Programs

Legal Aid funding to represent victims in civil proceedings

An LGBTQ Victim Assistance Legal Aid Project

Transitional Housing (X5)

Emergency needs of victims

Safe on Scene on scene support for victims of DV

Human trafficking project that rents an undisclosed series of apartments to provide secure locations to help victims escaping traffickers.

Hospital based violence intervention program for youth aged 13-15, who have been victims of gunshot and/or assault

Emergency room based Trauma Recovery Centers

Mobile Trauma Therapy project. They take phone requests, walk ins and referrals from our regional comprehensive victim service agencies.

Therapy

Capacity building with Child Advocacy Centers of Montana

Justice Center in Boise that provides services to all types of victims.

Children's Justice Centers





# Needed Projects Identified

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Abuse in Later Life	Capacity building with Child Advocacy Centers of Montana	CASA programs and child forensic interviews in rural areas	Children's Justice Centers	College Confidential Advocates	Coordinated Crisis Response (Mass Violence)/Statewide Crisis Response Teams
Emergency Needs of Victims e.g. rent for DV victims leaving abusive situation.	Expansion of Justice Center	Expansion of Trauma Recovery Centers	Faith Based Initiatives	First Responder Mental Health	Funds for Sheltering/care of pets of domestic violence victims
Homeless Victims	Hospital Based Violence Intervention Programs	Housing/Transitional Housing and Support Services	Human Trafficking Services	Law Enforcement Based Victims Services	Legal Assistance for Victims
Meth/Opioid Crisis/Treatment	One Time Funding for Equipment, Technology, and ADA Compliance	Prevention	Services to Specific Underserved Pops (LGBTQ, disabled, elderly)	Technology Statewide	Therapist Services/Therapy/Mental Health Assistance/Mental Health Services for Children
		Trauma Recovery Center	Victim Assistance in Rural Areas		

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# Innovative Program in Arizona

Agency Name: Purple Ribbon Council to Cut Out Domestic Abuse  
(DBA Bloom 365)

Project Title: Bloom It Up for Teens: Outreach, Advocacy and Peer Support (Maricopa County, AZ)

Year Receiving VOCA Funds: FY 2017 \$175,414  
FY 2018 \$410,300  
FY 2019 \$379,262  
FY 2020 \$411,421

# Victim Population served:

- 10% Bullying (Verbal, Cyber or Physical)
  - 30% Child Sexual Abuse/Assault
  - 10% Domestic and/or Family Violence
  - 50% Teen Dating Victimization
- 
- Female, male, LGBTQ and those who do not identify

# Victim Services Program Mission Statement:

- The mission of BLOOM365's "Bloom It Up" program is to empower teen victims and potential teen victims of dating abuse, sexual assault, domestic violence, bullying, gender based violence, and stalking through peer-guided outreach, education, crisis intervention, personal advocacy, group support and alternative therapies to boost their safety, healing and overall well-being.

# Agency Summary:

- BLOOM365 was founded as Purple Ribbon Council in 2006.
- Area of expertise is in the delivery and provision of age appropriate and culturally relevant outreach, education, advocacy and social activism programs for young people.
- Primary program participants are between the ages of 13 and 19. Secondary programs serve youth in grades K-6, as well as college students up to the age of 24.
- Team includes advocates who are skilled at working with adults and youth in crisis, LGBTQ youth, youth whose first language is not English, and undocumented and refugee youth.
- Since the pilot launch of the Bloom It Up program in 2013, the agency has provided information, referral and advocacy services to over 18,000 teens.
- BLOOM365 also has a longstanding positive track record of building coordinated collaborations with schools, domestic violence advocacy organizations, law enforcement, youth organizations and city governments.

# Problem Statement:

- Addressing the help seeking barriers teen victims face to increase their safety, healing and physical and emotional well-being.
  - 70% of youth become involved in romantic relationships
  - 33% of youth experience abusive and violent relationships
  - Warning signs of coercion and control were there, but the information on how to recognize the early indicators of abuse, as well as teen-driven victim services, was not.
  - If not addressed can lead to violent or lethal trajectory, as well as higher risk for social, emotional and physical problems

# Agency Statistics:

- Anonymous data collected from i>clicker remote technology from 5,000 BLOOM IT UP program participants between 2015 and 2016 indicates:
  - 74% of teens are “dating”
  - 60% know someone involved in a violent relationship
  - 62% have experienced verbal/emotional/physical abuse
  - 55% have perpetrated an act of dating abuse
  - 6% of teens who disclose victimization identify as LGBTQ

# Project Summary:

- Deliver education presentations in schools to an estimated 146,700 teen victims and potential teen victims
- Distribute resource information to 7,200 teens via outreach events
- Provide validation/referrals/information on victim's rights and safety planning to over 22,000 teens who anonymously disclose victimization
- Provide crisis intervention/emotional support/safety planning via phone/text/chat/social media lines to 1,126 teen victims
- Provide personal advocacy/emotional support to 2,254 teen victims on a drop in basis in partner schools and youth organizations
- Engage 500 teen victims in peer support activities
- Provide counseling to 240 teen victims of sexual assault
- Empower 180 teen victims through the healing arts
- Provide individual/group support to 336 teen victims who identify as LGBTQ
- Train 125 teens as Peer Advocates to sustain and scale the impact.



# Impact to victims:

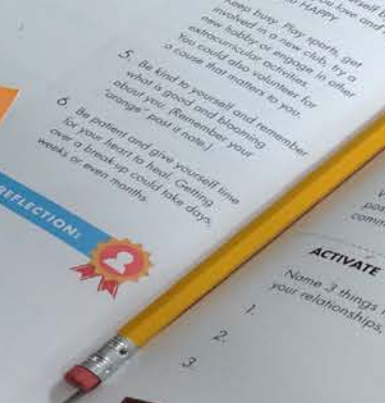
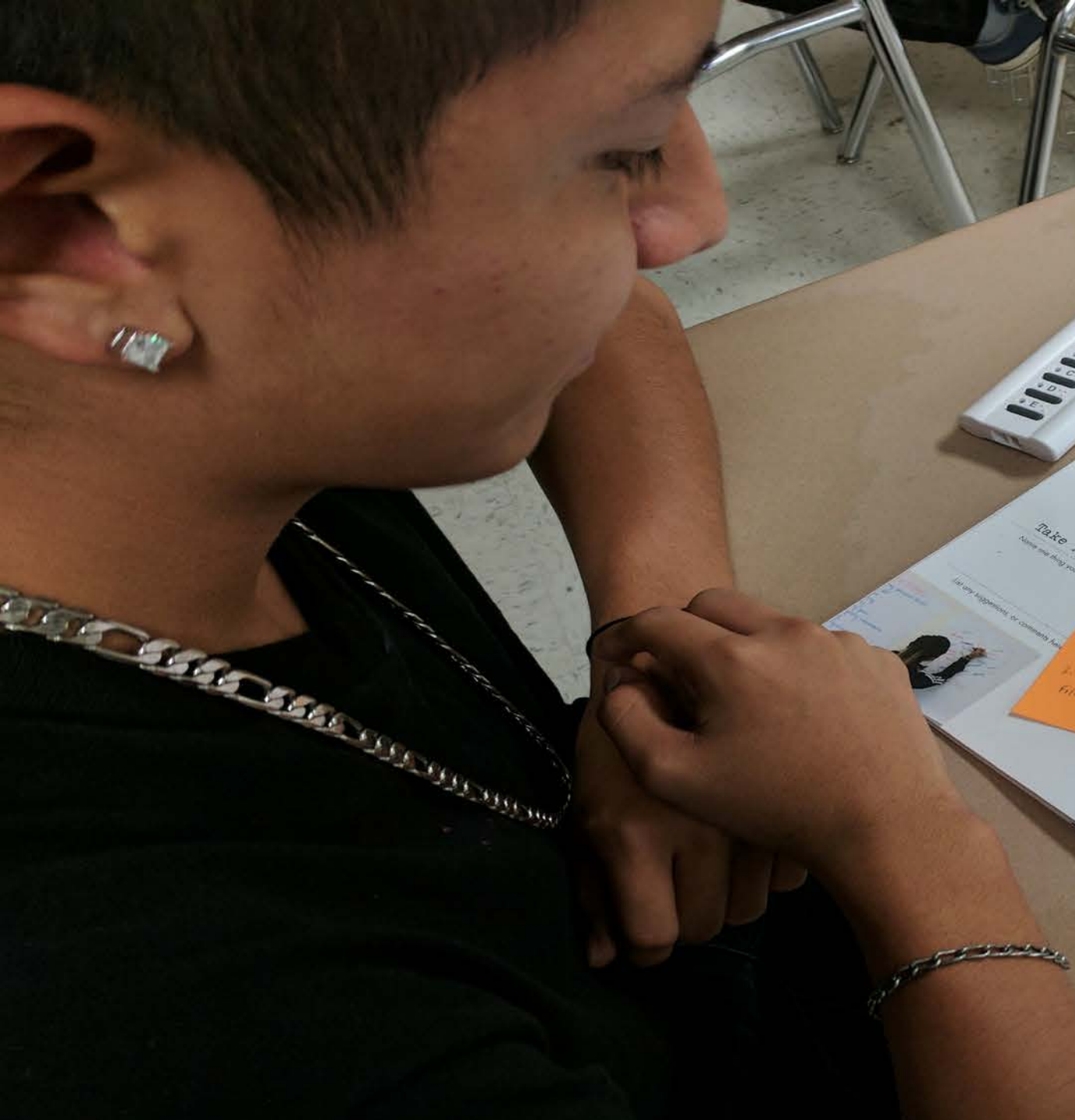
- Improved support system of peers who understand
- Enhanced well-being (boosted self-esteem, social connectedness, safety and access to resources)
- Increased understanding of victimization
- New knowledge on resources available to meet safety and healing needs
- Improved safety
- Feeling believed, validated and not alone

# Community Partners:

- At the time of the application, the agency had MOU's and letters of intent with the following to implement Bloom It Up at their sites:
  - 28 high schools in Phoenix, Glendale, Peoria, and Scottsdale
  - 12 community based sites (Tumbleweed, Florence Crittenton, One N Ten, SPOT127, 4 Boys & Girls Clubs, Upward Bound, Phoenix Dream Center, Aguila Youth, Be A Leader Foundation)

# High School 7-Dose Curriculum

- Comprehensive education presentations in schools via health education and other relevant classes
- Seven curriculum lessons/doses, lasting 50 minutes each



1. emotional  
2. Respectful  
3. friendly (make a lot of friends)

**KNOW YOUR DEAL-MAKERS**  
Let your six "deal-makers" know you would not be willing to compromise on these issues. Write down your deal-makers, and then, you would not be willing to compromise on these issues. Write down your deal-makers, and then, you would not be willing to compromise on these issues.

1. Use of drugs
2. drink, alcohol
3. unprotected

**KNOW YOUR DEAL-MAKERS**  
Let your six "deal-makers" know you would not be willing to compromise on these issues. Write down your deal-makers, and then, you would not be willing to compromise on these issues.

1. hook
2. cheating
3. disrespect

**6 TIPS FOR COPING AFTER A BREAK-UP**

1. Show your feelings and talk about it with someone you trust
2. Let it out - write your feelings in a journal to help move past the pain
3. Take care of yourself by doing things that you love and that make you HAPPY
4. Keep busy - Play sports, get involved in a new club, try a new hobby or engage in other extracurricular activities. You could also volunteer for a cause that matters to you.
5. Be kind to yourself and remember what is good and blessing about you. (Remember your "orange" post-it notes)
6. Be patient and give yourself time for your heart to heal. Getting over a break-up could take days, weeks or even months.

**UPSTANDERS**  
The 4 D's of Intervention: Distract, Delegate, Direct, Defuse

**OBJECTIVES:**

- Understand the theory of social change
- Know the difference between bystanders v. upstanders
- Identify your strengths for becoming a better bystander
- Start a movement in your school to promote kindness, empathy, respect, equality and consent in all relationships

**discussion:**  
Why is it so important to do or say something if you witness peer dating abuse?  
What skills or strengths do you have that could help create some positive change in your corner of the world? (eg. empathy, communication, conflict resolution, etc.)

**ACTIVATE**  
Name 3 things that you will do to help bring more "BLOOM" to your relationships, school and/or community.

- 1.
- 2.
- 3.

#bloom365

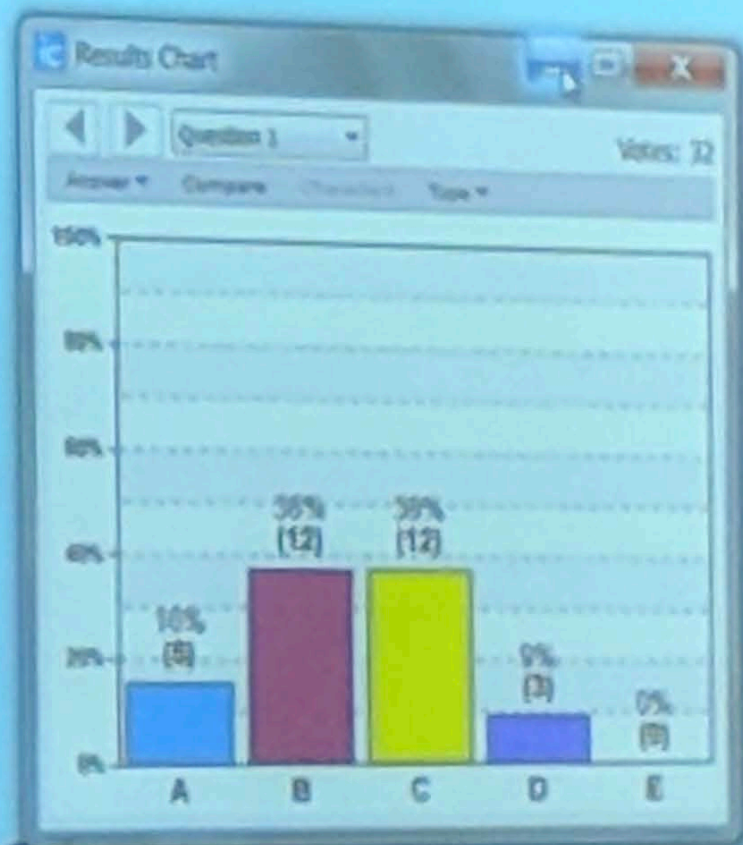


# Teen Dating Abuse is a big problem among my peers:

A. Strongly Agree

B. Agree

C. Disagree



# Doses:

- #1 Defining Teen Relationships: Caring or Controlling
- #2 Recognizing & Responding: Red Flags, Where/How to Get Help & How to Help a Friend
- #3 Preventing Root Causes: Power, Coercive Control & Gender Norms v. Exceptions
- #4 Preventing Root Causes: Social Acceptance, Insecurity, Taught Abusive Behaviors
- #5 Cultivating Root Solutions: Self-Esteem & Boundaries
- #6 Cultivating Root Solutions: 4 C's Communication, Conflict Resolution, Consent and Coping
- #7 Cultivating Root Solutions: Social Change & Bystander Accountability

DRAW THE LINE

blc@m365

RESPECT

dating

characteristics

labels

base

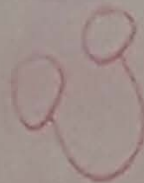
boo thing

together

fruit them

white

10:14



love

# Blooming?

- Honesty
- Love
- Respect
- Affection
- Kindness
- Negotiation
- Consent
- Peace

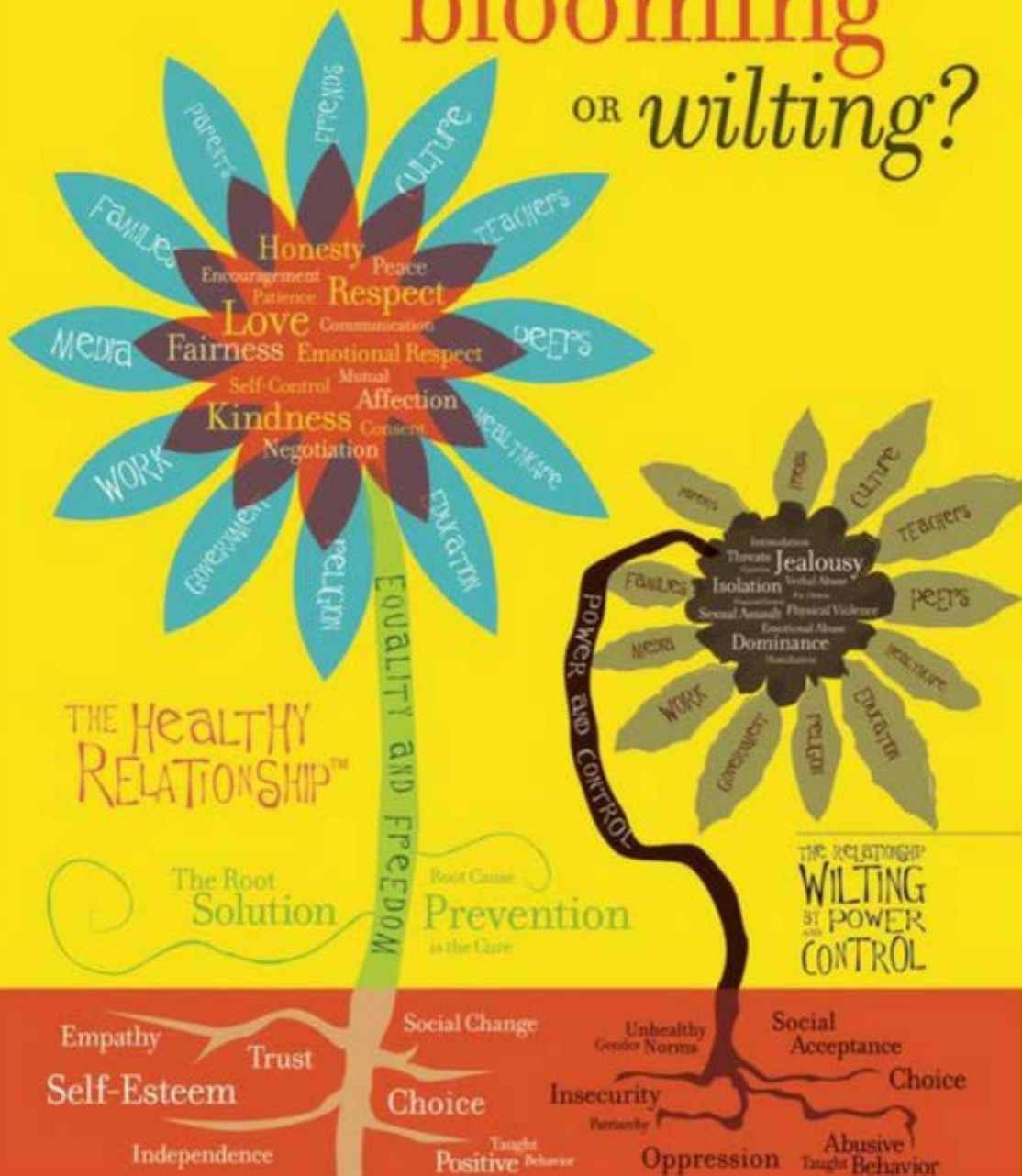
# Or Wilting?

Threats  
Isolation  
Dominance  
Humiliation  
Verbal Abuse  
Intimidation  
Coercion  
Put-Downs



ARE YOU

# blooming OR *wilting?*



THE HEALTHY RELATIONSHIP™

The Root Solution  
Prevention is the Cure

THE RELATIONSHIP WILTING BY POWER AND CONTROL

Empathy    Trust    Social Change    Unhealthy Gender Norms    Social Acceptance

Self-Esteem    Independence    Choice    Positive Behavior    Insecurity    Oppression    Abusive Behavior

Uproot Abuse.  Cultivate Kindness.

[bloom365.org](http://bloom365.org)

#bloom365

1-888-606-HOPE

# Other topics discussed:

Ground Rules – A Safe Place

Confidentiality and Respect

Mandatory Reporting

Your Rights

Signs of an Abusive Relationship

Red Flags

5 Ways to Respond to a Friend

Orders of Protection

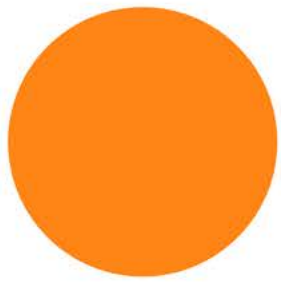
The Power of Control

Abuse v. Anger

# PRE/POST Education Surveys:

i>clickers collect anonymous pre/post survey data measuring the following:

- Attitude changes in the way they think about help-seeking.
- Knowledge increases on the warning signs/red flags, elevated risk factors, resources available
- Confidence for setting boundaries
- New skills for coping/healing
- Behavior change: reached out for help or signed up as a Peer Advocate
- Prevalence of teen dating abuse and type of victimization

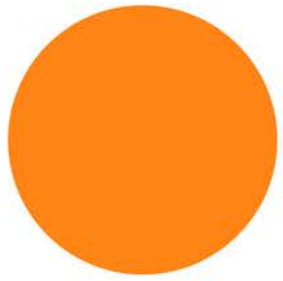


# Step 1: Educate

## 7-Dose Curriculum information and referral

- Dose 1: Defining Dating Abuse
- Dose 2: Red Flags, Safety Planning, How to Get Help, Help a Friend
- Dose 3: Root Causes- Unhealthy Gender/Social Norms
- Dose 4: Root Causes-Social Acceptance, Oppression, Insecurity, Taught Abusive Behavior
- Dose 5: Self-Esteem
- Dose 6: Root Solution- 4 Skills to Build Healthy Relationships  
Communication, Consent, Conflict Resolution, and Coping
- Dose 7: Root Solution- Bystander intervention & Social Change





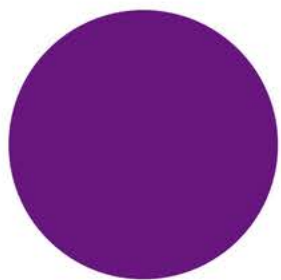
# Step 2: Advocate

## Individual & Group Support

safety, healing and support for teens who have experienced victimization

- Safety Planning & Emotional Support
- Text/Chat Help
- Weekly Drop In Support Groups
- Weekly Healing Arts Groups
- Monthly Peer to Peer Activities
- Resource Connections





# Step 3: Activate

## Peer to Peer Activism

teens activated to cultivate respect, empathy, kindness, equality, consent, safety and peace as the standard.

- BLOOM365 CREW Awareness Liaisons (40% Sign Up)
- Trained Peer Advocates (40/Year)
- Digital & Social Media Influencers (10% Tipping Point)



- Peer-driven outreach
- Peer-led delivery of "Flash Doses," Middle School programs, Puppet Theater, and Reader's Theater
- Peer-led social change

# Project Costs:

- 1.0 FTE Lead Youth Advocate (LGBTQ)
- 1.0 FTE Lead Youth Advocate (Case Management)
- 1.0 FTE Outreach Advocate
- .75 FTE Youth Advocate (After School/Weekend)
- 1.0 FTE Volunteer Coordinator
- Peer Advocates (25 Volunteers x 10 hours/month on average)
- ACESDV Peer Advocate Training
- Counselor/Clinical Supervisor

# Project Costs Cont.

- Counseling Intern
- Healing Arts Therapists (Art, Music, Yoga)
- Mileage
- Training costs (at national and local conferences)
- Passenger van
- Office furniture
- Supplies, case management software
- Rent, cell phones, social media pages

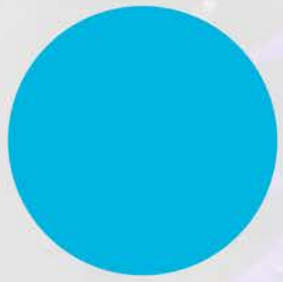


# Services (job description(s)):


- Conduct 7 Doses classes in schools, respond to those identifying as victims, or those inquiring about friends who are victims
- Provide immediate crisis intervention and safety planning to victims who reach out for help during education presentations
- Identify Peer Advocates and train (7 Doses plus 40 hour Peer Advocate Training) who then function as a resource within schools
- Individual Counseling & Coordination to teens victims of sexual assault as well as teens who have experienced dating violence; participate in child and family team meetings as needed, and facilitate and participate in case management with school counseling staff

# Services (job description(s)) Cont.

- Counseling Intern provides individual and group counseling support to teen survivors of verbal, emotional, physical abuse who are experiencing elevated challenges to healing, including but not limited to depression, anxiety, substance abuse, self-harm, and suicide ideation.
- Counseling Intern also works with Youth Advocate to coordinate weekly healing arts therapies with local healing arts resource providers
- Counseling Intern provides individual counseling and therapeutic support groups at the “Blooming Point” Center and in assigned schools.



**impact**

 Thank you for the BLOOM program, it ... Has  
made me open my eyes and realize  
that I was in an abusive  
relationship & I need help fast  
I'm seriously scared to even  
ask if I can go to the mall  
with friend, he makes me  
so scared of him. I need to  
change this



**impact**

Class Hour/Period: 1  2 3 4 5 6 7 8

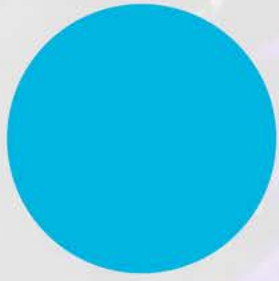
School: North High School

Gender: Female  Male Grade: 9

Thank you for BLOOM365, it...

gave me confidence to help  
my friends who are experiencing  
an unhealthy relationship.

Ever since bloom365 came to our class I come to realize that what my boyfriend is doing is trying to have power and control of me. Everything he has done is on the wilting flower. He used to tell me what to wear and he doesn't like me having friends. He has cheated on me and even once pushed me roughly against the wall. I really like him but me staying with him would keep me unhappy. Don't think I'm depressed lol but this morning I broke it off and I just feel a great weight off of my shoulders. I want to thank you for opening my eyes to all of the wilting characteristics.



**impact**

Class hour/Period. 1 2 3 4 5 6 7 8

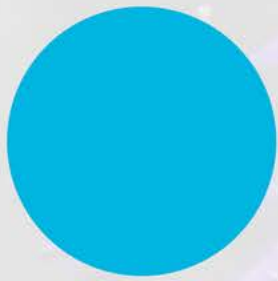
School: \_\_\_\_\_

Gender: Female Male Grade: 9

Thank you for BLOOM365, it...

Helped me have a whole different viewpoint and got me to stop victim blaming. Bloom 365 also taught me what to do if I was ever in a situation in where any sort

of abuse is taking place.



# impact

bloom365

Uproot Abuse. Cultivate Kindness.

In what way(s) do you feel bloom365 helped you and/or a friend?:

bloom help me because when I first started dating this girl I didn't realize that I was controlling the relationship now I'm not.

Please share one thing you learned that you did not know before bloom365:

BGHS

Grade:

9

10

11

12

Gender Identity:

Female

Male

Transgender

Do not identify

bloom365

# Safety Goal Outcomes:

1569/90% of teen victims demonstrated increased knowledge of safety and protection.

1569/90% of teen victims reporting an increased knowledge of services available.

1569/90% of teen victims who report they know how to access short and long-term resources that meet their emotional needs.

6/100% of teen victims that know how to plan for their continued safety.

6/100% of teen victims reporting their safety has improved.



# Healing Goal Outcomes:

6/90% of teen participants reporting they have an improved support system

6/90% of teen victims who report having increased functioning and feelings of well-being (self-esteem, social connectedness, safety, access to resources).

6/100% of teen victims who report feeling believed/not alone.

6/90% of teen victims who report they know how to access short and long-term resources that meeting their emotional and safety needs.

# Narrative from last Quarterly Program Report:

From January to March 2018, 464 teens, out of the 3,404 teens, who completed 7 lessons of our outreach education program anonymously disclosed that they experienced victimization.

These disclosures were received through student's answering an anonymous survey, administered through the use of clicker devices, as well as written disclosures on cards left behind in class. These teens, along with all students enrolled in the program, received information on local resources for help-seeking, practiced completing a safety plan during class and received information on victim's rights.

Of the teens who disclosed and self-identified as victims, 443 directly reached out for help to our advocacy team before, during or after class and 21 reached out via text/phone/social media instant messaging.

Support services performed include: Safety planning (443 teens), information on victim's rights and restraining orders (268 teens), referral to community resources (143 teens), crisis counseling (5 teens), ongoing individual advocacy sessions (77 teens) and group support (169 teens). In addition, 15 teens were trained as Peer Advocates this quarter.



# Future plans:

- Review school policies and provide recommendations to Bloom It Up partner schools as it relates to the safety of teen victims
- Coordinate quarterly training and in-service workshops for school administration, counselors, faculty and staff on victim advocacy
- Develop coordinated community response teams in each school district, assuring involvement from school personnel, parents, teens, domestic violence advocates, health care providers, youth pastors and communities of faith, law enforcement, behavioral health professionals, and others who interact with youth



**contact us**  
**sponsor a teen**



**GIVE.**  
**GROW.**  
**BLOOM.**

---

\$35 saves a life



602.524.9607



donna@bloom365.org



bloom365.org



/UprootAbuse



@UprootAbuse



BLOOM365



VOCA Monitoring Practices  
Suzanne Breedlove  
Oklahoma Director of Victims Services  
June 20, 2018

In Oklahoma, we have  
3 VOCA monitors that  
perform both  
programmatic and  
financial monitoring  
of all subgrants.

# Grant Monitoring Distribution

- ❑ There are 172 subgrants and those grants are split between the 3 monitors, which is an average of 57 each.
- ❑ Monitors decided how they wanted to split them up.
- ❑ One monitor loves to travel to the rural areas, so she took most in the outlying areas.
- ❑ Another monitor has a child, so she focused on the metro areas.
- ❑ The third monitor took the areas between.



- ❑ It has worked out well giving monitors some ownership in deciding which programs they would monitor.
- ❑ Monitors are required to do one on-site monitoring visit every two years, and a desk review in the year they are not doing a site visit.
- ❑ All new subrecipients also get a visit to help them get established and trained on what is expected.
- ❑ A new Compliance Officer was added in order to help make sure subgrantees have submitted all required documents.

- ❑ The monitoring staff also reviews all of the new applications and makes funding recommendations to the 9-member Board.
- ❑ Oklahoma has an annual competitive process and the grant reviews usually take an entire month to complete.



Once grants are awarded, the monitoring staff begins the work of setting a schedule to visit new programs. The risk assessments also helps guide the monitors in determining which grantees should have a site visit first. We recently adopted Michigan's risk assessments and modified it to meet our needs.



# Financial Training

- ❑ Annual Mandatory Financial Training for Project Directors and Finance Officers of new programs and programs with less than two years of VOCA experience.
- ❑ All VOCA Monitoring Staff participates.
- ❑ PMT and SAR requirements are also covered in this all-day meeting.
- ❑ The future plan is to create mini videos for each segment of this training.

# Technical Assistance

VOCA Monitors Provide T/A in the following areas:

- ❑ Online Grant Management System
- ❑ Data Collection
- ❑ Program Development
- ❑ Volunteer Recruitment
- ❑ Promoting Coordinated Community Response
- ❑ Compliance with Civil Rights Requirements
- ❑ Collaboration with Tribal Programs
- ❑ Locating Training Opportunities

# Electronic Tracking of Monitoring Activity

- We utilize an Excel Spreadsheet called the “Monitoring Plan Template” on a daily basis.
- This spreadsheet has all of the information related to monitoring, all in one place.
- The Administrator can review who the assigned monitor is, when site visits are scheduled and fulfilled, desk review dates, audit reports due dates, risk assessments, findings, etc.
- This spreadsheet is our monitoring plan and is accessible by all VOCA staff. We implemented this spreadsheet format in 2016 and it has grown as our needs have changed and we’ve figured out the new CFR Part 200 requirements.
- It’s not pretty, but it WORKS!



# Risk Assessment Tool

- ❑ The Risk Assessment Tool we utilize is also in Excel.
- ❑ We can't take credit for it ... we stole it from Michigan and adapted it to our needs.
- ❑ The Risk Assessment Tool is completed in order to determine the order of monitoring and the number of visits a subrecipient should expect.

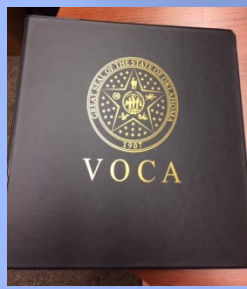
We do not utilize any other stakeholders to assist with monitoring.





# Common Monitoring Findings

- ❑ Timesheets not properly tracking VOCA time for grant and match staff
- ❑ Lack of supporting documentation for contracts and equipment inventory
- ❑ Unallowable costs
- ❑ Lack of a separation of duties
- ❑ Goals and objectives not being measured
- ❑ Volunteer time not being logged appropriately
- ❑ Grant-funded staff are not familiar with the goals and objectives written in the grant
- ❑ Late reporting
- ❑ Not uploading proper documentation into their online grant
- ❑ Poorly written contracts
- ❑ Failure to keep a separate accounting of VOCA funds
- ❑ VOCA-funded staff doing unallowable activities (perhaps they are allowable under the rule, but were not funded by the Board).
- ❑ Consultant invoices do not have adequate documentation of the work performed



# VOCA Binder

- ❑ Supplied during the financial training (one per subgrant).
- ❑ Dividers are also provided that list everything the binder should contain, by month for easy recordkeeping.
- ❑ All information needed for the site-visit is located in the Binder, making monitoring visits more efficient.



Contact information:  
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VOCA Assistance & Compensation Administrator  
District Attorneys Council  
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Oklahoma City, OK 73103  
405-264-5006  
1-800-745-6098

# **Using VOCA to Fund Innovative Programs**

**VOCA Administrator's Meeting – Salt  
Lake City, UT**

**June 20, 2018**



# Outreach to Solicit Applications

- Existing subgrantees were notified of changes to the new VOCA Rule far in advance of the rule's adoption.
- Subrecipients were advised to DREAM BIG.
- No specialized RFP.
- Goal – enhance existing programs, fund activities never before possible, fund services in more tribal communities, and fund new projects.
- Any service/expense allowable under the new rule was considered.
- There was targeted outreach to the 38 tribes headquartered in Oklahoma which increased tribal participation and funding.
- We also reached out to Legal Aid in Oklahoma, which is a non-profit legal services program.

# Outreach to Solicit Applications (cont.)

- Through regular meetings with stakeholders, unmet needs were identified.
- The District Attorneys Council is the SAA for the ARREST/ICJR grants and helped form all of the CCRTs in Oklahoma. One of the VOCA monitors was the former CCRT Coordinator so we also have a connection with all of the CCRTs in the state.
- The VOCA program is co-located in the agency that provides administrative support to all of the elected DAs and their Victim/Witness staff, which helps us have a better understanding of victims needs from the criminal justice perspective.
- Civil/Legal Services, police-based victims services and transitional housing were identified as Oklahoma's top unmet needs. The increase in VOCA funds made it possible to address many of these needs.



# Enhancements to Application

- The online application was substantially changed due to the increased funding, the new rule, and the addition of indirect costs – all of which happened simultaneously.
- Two new question were added to the application:
  - 1) The impact of increased VOCA funding for the project; and
  - 2) the positive impact of VOCA funding in the community.
- The responses we received from the field were inspiring and described to us how VOCA Funds SAVE VICTIMS' LIVES! More VOCA Funds and more programs saves MORE VICTIMS' LIVES.
- Responses were shared with the VOCA Board Members.





# Some of Oklahoma's Innovative Projects



# Cherokee Nation

Trauma-informed, culturally specific activities and services for tribal children in tribal foster care.



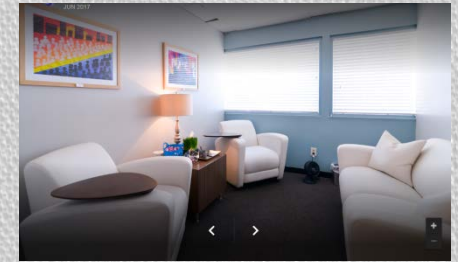
## Positive Impact of VOCA Funding in the Community

Children are returned home with decreased effects of trauma, better self-awareness and self-esteem, more confidence and hope for the future.



# Palomar – A Community of Strength & Healing

Oklahoma City's Family Justice Center – Providing victim-centered, safety-focused, culturally-responsive wraparound services to victims of Domestic Violence and Sexual Assault, and their children



# Absentee Shawnee Tribe

Domestic Violence Program providing crisis intervention, case management, advocacy, court advocacy, and transitional housing.

## Impact of VOCA

Without such funding, the Absentee Shawnee Tribe Domestic Violence Department would not have been able to provide transitional housing services.

## Positive Impact of VOCA Funding in the Community

VOCA funding has allowed the program to provide housing assistance to victims throughout three of the service areas. The transitional housing coordinator has been able to provide supportive services and referrals as needed to ensure victims continue to live in stable abuse-free housing.



# Legal Aid Services

Legal Aid Services is embedded in 17 DVSA across the state of Oklahoma, assisting in domestic violence and sex trafficking cases.

## Impact of VOCA

VOCA funding has greatly expanded LASO's delivery of legal services to victims of crime, primarily by providing embedded attorneys in domestic violence programs, allowing more DV survivors to access legal services.

## Positive Impact of VOCA Funding in the Community

Having LASO in these shelters has made it possible for victims of domestic violence to get help for themselves and their children.



# Otoe-Missouria Tribe, Ponca Tribe, and Eastern Shawnee Tribe

## Impact of VOCA

VOCA provides funding to address many gaps not funded through other sources such as: contractual counseling and legal assistance, transitional housing, emergency relocation and other emergency needs.



## Positive Impact of VOCA Funding in the Community

Thanks to VOCA funding, mothers have been able to seek legal services and keep their children, have a warm safe environment to rest and plan steps for rebuilding their lives, work through the trauma, and begin to understand how to have healthier lives through counseling.

# University of Oklahoma Health Science Center



Program to train medical providers associated with Children's Advocacy Centers and Multidisciplinary Teams to perform medical evaluations of child victims of physical abuse and neglect in rural sections of Oklahoma.

## Impact of VOCA

VOCA funding has made it possible for a child abuse pediatrician to travel to areas lacking trained medical providers to train local pediatricians on how to conduct a victim-center child abuse examination.

## Positive Impact of VOCA Funding in the Community

Through proper training and ongoing peer support, pediatricians in remote portions of the state are able to successfully complete medical evaluations for abused children. Evaluations can continue after the training program is completed with support provided through remote communication, as needed.

There continues to be a severe shortage of doctors with the knowledge, expertise, and willingness to perform child physical and sexual abuse exams in rural Oklahoma, leading to the continued victimization of children. Through this grant, we hope to change that.



# **Native Alliance Against Violence**

**The CIRCLE Project provides victims high quality, culturally-competent and effective legal services/assistance, combined with an array of victim advocacy supportive services that respond to the emotional and physical needs of crime victims.**

## **Impact of VOCA**

**Without VOCA funding, the CIRCLE Project would not have been able to serve victims of crime in Indian Country.**

## **Positive Impact of VOCA Funding in the Community**

**The NAAV staff tells us the Tribal DVSA Programs in Oklahoma are elated to have the services provided through the CIRCLE Project.**





# Oklahoma Interviewing Services

Mobile forensic interviewing program serving victims of child abuse in rural Oklahoma in a child-friendly, comfortable, non-threatening environment.



# Questions

Contact information:

Suzanne Breedlove

Director of Victims Services

VOCA Assistance & Compensation Administrator

District Attorneys Council

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# INNOVATE APPROACHES/WORKING WITH UNDERSERVED COMMUNITIES

UTAH OFFICE FOR VICTIMS OF CRIME

# STRATEGIES WHEN WORKING WITH UNDERSERVED COMMUNITIES

- You have to start at grass roots level, by building trust.
- It takes a lot of work and patience- Meeting diverse audiences where they are is critical to building trusting relationships.
- Take time to go to them- You will need to be in those communities talking to the people about what it is they want or they see or they need.
- Consider utilizing a public venue such as a community festival for meeting people of those communities.



# CHALLENGES – INCREASED FUNDING TO ADDRESS CRIME VICTIM NEEDS

- IDENTIFYING CRIME VICTIM NEEDS & IMPLEMENTING NEW PROGRAMS
- Needs Assessments (domestic violence, sexual assault, training)\_
- Outcome: Identified a critical need for housing (six out of ten top priorities)
- Called other States/ Traveled to Washington and Colorado
- Identified critical components of a Model Housing Program
- Released a \$2,500,000 Utah Housing First RFP to include all crime victims
- Project date: July 1, 2018 through June 30, 2019

# CONTINUE

- Outreach to Community Groups
- Children's Justice Centers
- Funded ten Children's Justice Centers to provide trauma informed assessment and treatment(no cost – length of treatment based on victims need)

- \$1,500,000

## Legal Services

Held three meetings with legal services providers from throughout the State

Developed criteria for expanded legal services under VOCA regulations (August, 2016)

Increased program funding for existing VOCA funded legal services and expanded services through funding additional agencies

## Law Enforcement Victim Advocacy and Assistance services

Met with numerous law enforcement agencies (one-on-one) and attended Chief's and Sheriff's meeting – seven new law enforcement agencies received VOCA funds this year

# CONTINUED

- Held meetings with domestic violence shelters, rape recovery centers, and other non profit direct service providers
- Rape recovery services are being expanded to new counties statewide
- Reached Out to Underserved Communities
  - Traveled throughout the State
  - Held meetings at UOVC
  - Met with underserved communities group by group
    - LGBTQ
    - Refugees
    - Hispanics
    - Polygamist

# GUIDING PRINCIPLES OF COMMUNITY ENGAGEMENT:

- Listen and pay attention to histories of marginalization and mistrust;
- Have open discussions;
- Include local knowledge;
- Encourage cooperation;
- Identify opportunities for co-learning from the communities;
- Make important efforts towards sustainability, systems development, and capacity building; and
- Make important efforts to protect the well-being, interests, and rights of communities.



# INNOVATIVE PROJECTS

- **Cherish Families-**
  - 2016-2017: \$107,700.12
  - 2017-2019: \$397,970.38
- **Utah Navajo Health Systems-**
  - 2015-2016: \$36,236.54
  - 2016-2017: \$32,076.32
  - 2017-2019: \$84,238.45

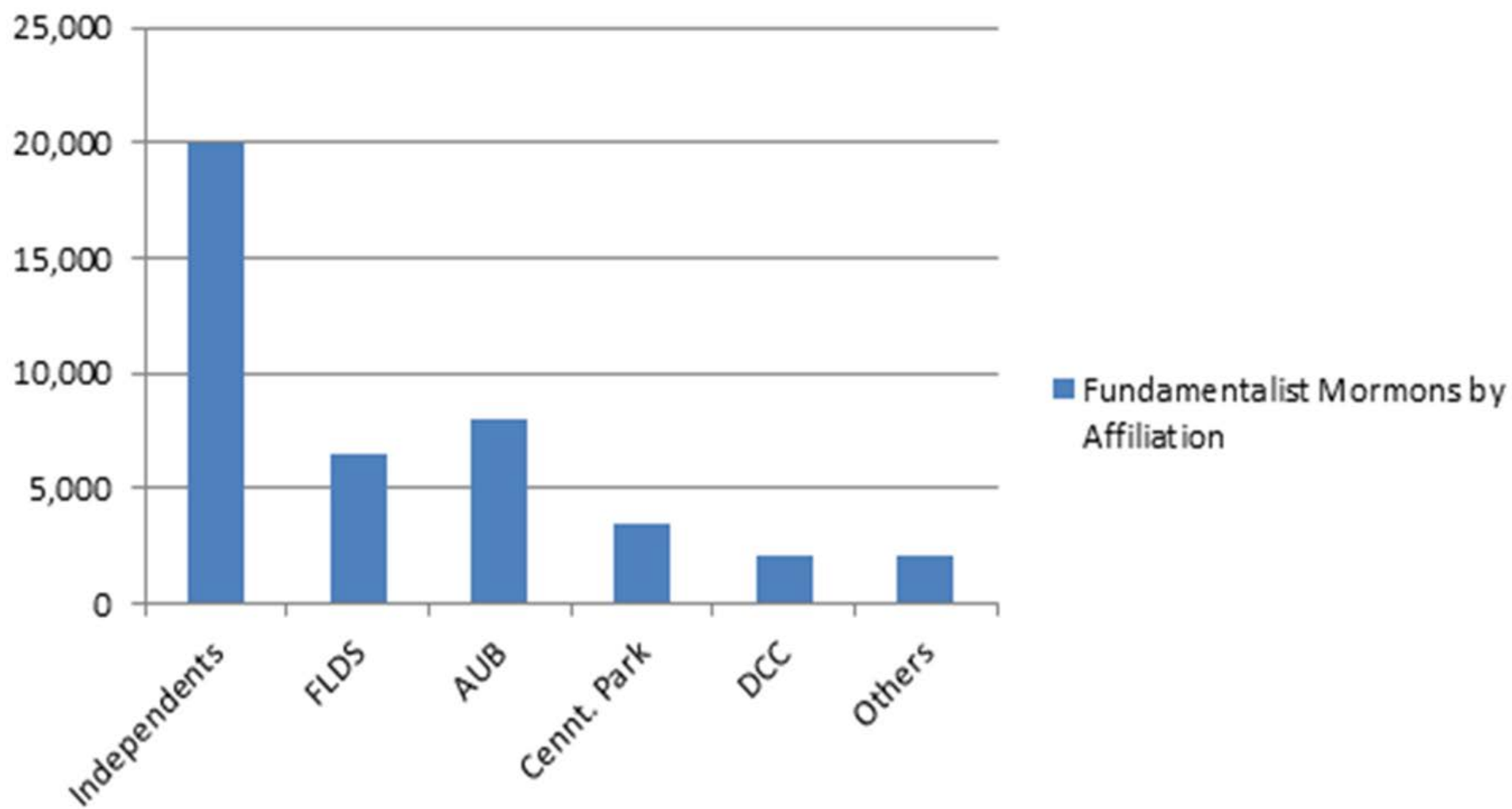
# CHERISH FAMILIES

- Cherish Families began in 2013 as a grassroots movement to support members of under served communities, particularly those from plural families and communities — a culture its founders, who come from polygamous backgrounds, deeply understand.
- Cherish Families gained 501(c)(3) non-profit status in December 2014.
- They are committed in supporting people in under served communities by providing access to resources and services that empower individuals and families in being whole and making choices that work for their specific needs.
- Their entire purpose is to help individuals that have experienced victimization or trauma to identify their own strengths and take steps toward self-determination. Many of their advocates were once part of the FLDS, which gives us a unique level of trust and understanding for those seeking services.

THERE ARE AN ESTIMATED 30,000 POLYGAMISTS IN UTAH



## Fundamentalist Mormons by Affiliation



# SUCCESS

- Organizing a cleanup crew of more than 200 people and providing food for volunteers following a flash flood that killed 13 people in Hildale, Utah
- School Clothing and Supplies Drive - In 2015 and 2016 Cherish Families partnered with the Southern Utah Assistance League to help clothes children that were entering the school system for the first time. We helped provide school clothes and supplies to over 350 children. Many of those families are now able to provide clothing for their own children for the 2017 school year.
- A Christmas toy drive for children of FLDS families, many of whom were celebrating the holiday for the first time.
- In 2016, through our mentoring program, we mentored 64 women and 11 men. 13 of the women and 3 of the men that completed the program are now mentoring others. One mother of 6 is now in her own home, has a steady job, and has gone back to school. In addition, all of her 6 children are now attending school for the first time.

- In 2016-17 we provided victim related services to 258 individuals totaling 897 difference services. Those include protective orders, accompaniment to court, help with identity theft, hate crimes intervention and advocacy, and basic needs including food, clothing, and shelter.
- In 2016-17 we trained the Dove Center women's shelter, Safe Harbor Women's Shelter, New Horizon's Women's Shelter, Utah Coalition Against Sexual Assault employees and advocates, Utah Domestic Violence Coalition volunteers and staff, Children's Justice Center, and the Southwest Behavioral Health, to name a few.
- We provide emergency basic needs as a first point of contact, which allows us to offer other services and case management as people transition from the FLDS to mainstream society. In the month of July 2017 alone we provided these needs such as food, clothing, and furnishings to 42 families (311 people).



# UTAH TRIBAL COMMUNITIES



# TRIBAL COMMUNITIES IN UTAH

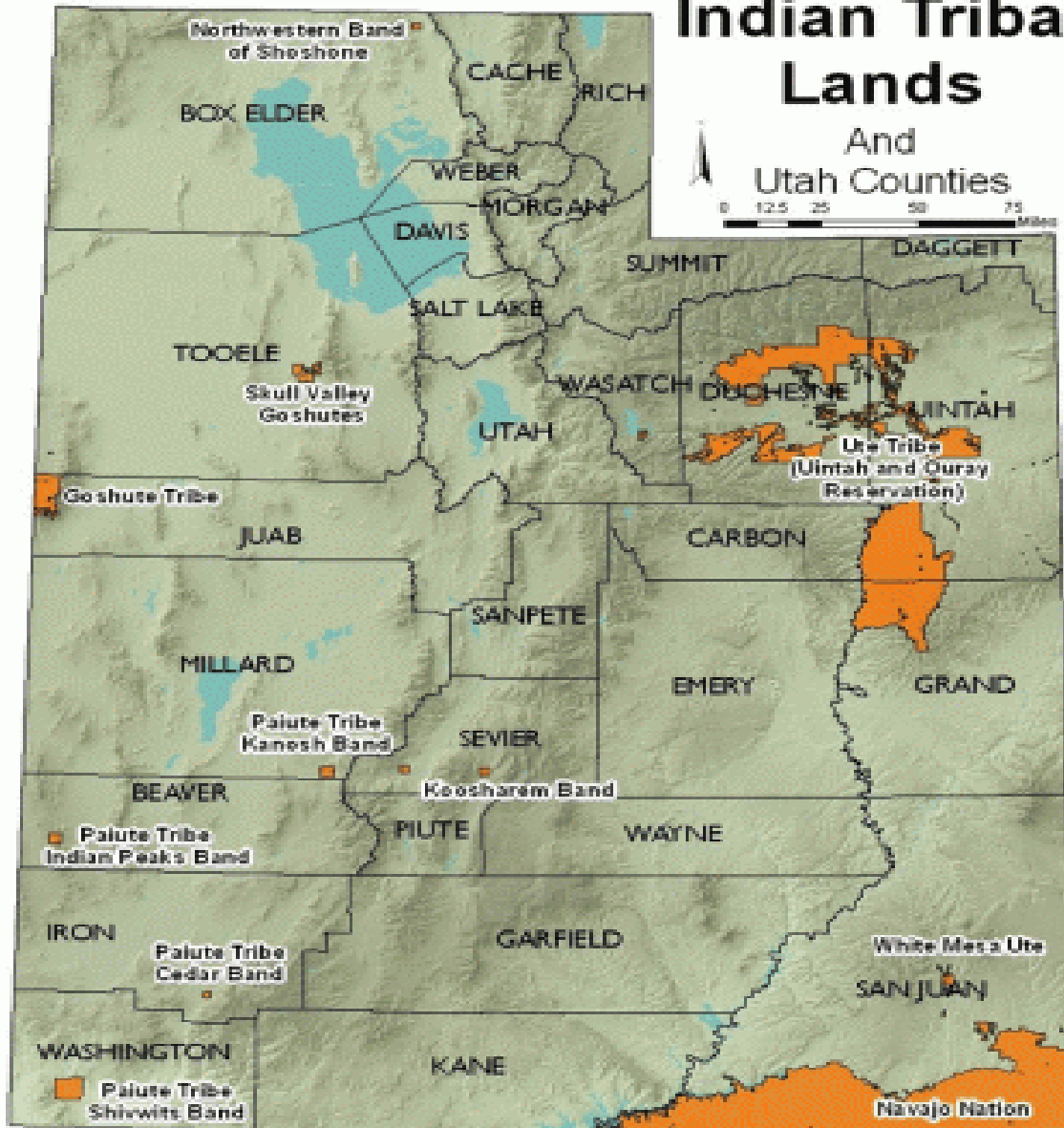
- There are about 60,000 Native American/American Indian/Alaska Native living in Utah
- Census data show that the largest tribal communities indigenous to Utah are the Navajo Nation, Ute Indian Tribe, and Paiute Indian Tribe of Utah.





# Indian Tribal Lands

And  
Utah Counties



San Juan Southern Paiute  
(reservation land not designated)

Quoted by Barbara Perry - Utah Division of Water Resources - May 4, 2005

- Northwestern Band of Shoshone
- Skull Valley Goshutes
- Ute Tribe (Uintah and Ouray Reservation)
- Goshute Tribe
- Paiute Tribe
  - Kanosh Band
  - Koosharem Band
  - Indian Peak's Band
  - Cedar Band
  - Shiwits Band
- White Mesa Ute
- Navajo Nation
- San Juan Southern Paiute

# UTAH NAVAJO HEALTH SYSTEM

- The start date of the program *January 1, 2016*
- First year: they projected to provide 325 services in six months; Most recent contract: they projected to provide 1,050 services in two years
- **Types of crime victims served**: child abuse/neglect (physical and sexual), Domestic Violence, Adult Sexual Assault, DUI/DWI Incidents, Adults Sexually Abused as Children, Elder Abuse/Neglect, Robbery, Survivors of Homicide Victims, Stalking/Harassment, Violation of a Protective Order;
- **Types of services provided**: Information and referral about the criminal justice process; I/R about victims rights; how to obtain notifications, etc.; Referral to other victim services programs and other services; Victim Advocacy to emergency medical care; Victim Advocacy to medical/forensic exam; Individual advocacy; Intervention with employer, creditor, landlord, or academic institution; Transportation assistance; Interpreter services; crisis intervention; on-scene crisis response; individual counseling; other therapy (traditional healing); emergency financial assistance; emergency shelter; transitional housing; relocation assistance; notification of criminal justice events; victim impact statement assistance; assistance with restitution; assistance with a compensation application

- Lynn Bia, Victim Advocate

Montezuma Creek Office: 435-651-3762

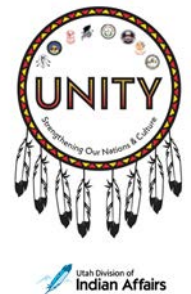
- Shawna Whitehorse, Victim Advocate

Blanding Office: 435-651-3749



# NATIVE AMERICAN INITIATIVE

- Utah Department of Human Services-Quarterly Tribal and Indian Issues Committee
- Utah Division of Indian Affairs-Quarterly Tribal Leaders Meeting
- Visit tribal communities
- Attend meetings, events, and Pow-Wows



QUESTIONS?



THANK YOU!

Christine Watters

Victim Assistance Coordinator

[cwatters@Utah.gov](mailto:cwatters@Utah.gov)

801-238-2369



# Office of Justice Programs

## Requirement to Monitor Subrecipients

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# Uniform Guidance ([2 CFR 200](#))

- Pre-award risk
- Post-award monitoring
- Procurement contracts
- Subawards




# Procurement Contracts vs Subawards



Why is this distinction important?

- Different compliance requirements
- Different reporting requirements

# Procurement Contracts vs Subawards

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- [2 CFR §200.92](#) Subaward Definition

Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be *provided through any form of legal agreement*, including an agreement that the pass-through entity considers a contract.

- [2 CFR §200.22](#) Contract Definition

Contract means a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award.

# Pass-through Entity and Subrecipient

A close-up photograph of a person's hand holding a black pen with a gold nib, writing on a white document. The document has some faint, illegible text on it. The background is blurred, showing what appears to be a desk or office environment.

- Pass-through Entity - a non-federal entity that provides a subaward to a subrecipient to carry out part of a Federal program (2 CFR 200.74).
- Subrecipient - a non-federal entity that receives a subaward from a pass-through entity to carry out part of a federal program (2 CFR 200.93).

# Procurement Contracts vs Subawards



## *Procurement Contract*

- Provides similar goods or services to many different purchasers.
- Provides the goods and services within normal business operations.
- Normally operates in a competitive environment.
- Provides goods or services that are ancillary to the operation of the Federal program.

## *Examples*

- Accounting firms
- Office supply stores
- IT services
- Legal services
- Specified services in support of a research program
- Agreement specifies the types of goods and services provided and the associated costs

# Procurement Contracts vs Subawards



## *Subaward*

- Performance measured in relation to whether objectives of a Federal program were met.
- Responsibility for programmatic decision making.
- May determine who may be eligible to receive Federal assistance under the program guidelines.
- In accordance with its award agreement, uses Federal funds to carry out a program for a public purpose specified in authorizing statute.

## *Examples*

- Entity that identifies and selects mentors and mentees under a federal award funding a mentoring program.
- Data from entity's operation used to report program progress or performance to the federal agency.
- Entity authoring a publication pursuant to program goals and objectives.
- References to legislation authorizing program or CFDA number may be used in award agreement.
- Entity conducting research pursuant to program goals and objectives.

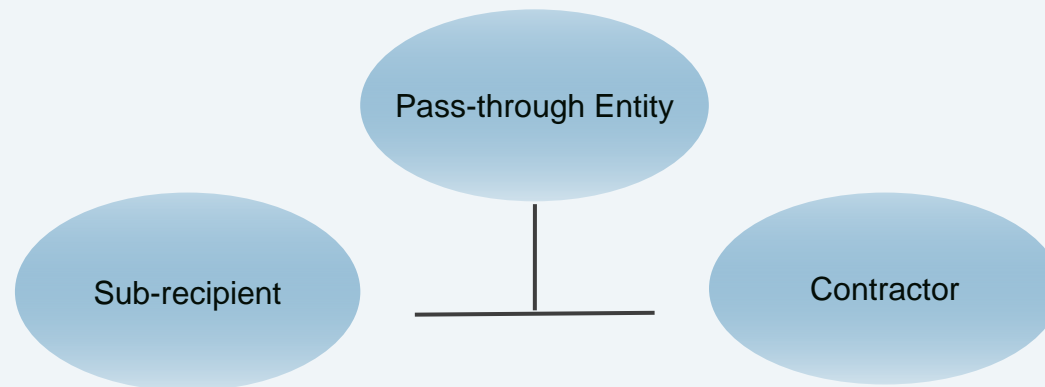
# Characteristics of a Subrecipient vs. a Contractor



<b>Subrecipient</b>	<b>Contractor</b>
Determines who is eligible to receive what federal assistance.	Provides the goods and services within normal business operations.
Has its performance measured in relation to whether objectives of a federal program were met.	Provides similar goods or services to many different purchasers.
Has responsibility for programmatic decision making.	Normally operates in a competitive environment.
Is responsible for adherence to applicable program requirements specified in the federal award.	Provides goods or services that are ancillary to the operation of the federal program.
Uses federal funds to carry out a program specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.	Is not subject to compliance requirements of the federal program as a result of the agreement, though similar requirements may apply for other reasons.

# Subrecipient vs. Contractor Determination

- The determination on whether an entity receiving federal funds is a subrecipient or contractor is not always straightforward.
- No one single factor alone will dictate one type of relationship over the other.
- An entity need not possess all the characteristics in the determination process, but may in fact possess characteristics from both.



# Subrecipient vs. Contractor Determination *(cont.)*

- The “form” (i.e. MOU, partnership, etc.) is less important to the examination of a relationship than its “substance.”
- “*Substance*” refers to the characteristics of the arrangement and whether it casts the party receiving the funds in the role of a subrecipient or a contractor.
- Labeling an organization as a subrecipient or contractor does not automatically create that type of relationship.
- Title 2 CFR Part 200.330 offers assistance with classifying an entity as either a subrecipient or contractor.




# Procurement Contracts vs Subawards



## Additional considerations:

- Common to make several subawards to fund similar goals and objectives.
- Subawards are usually awarded based on achieving the goals and objectives of the federal award.
- If matching funds are required, it is a subaward.
- [OJP Checklist](#)

# Procurement Contracts vs Subawards

A close-up photograph of a person's hand holding a black pen with a gold nib, poised to write on a document. The document is out of focus, showing some faint text. The background is a soft, blurred light color.

**For grant recipients with procurement contracts, key compliance requirements include the following:**

- Full and open competition
- Applicable contract provisions
- Noncompetitive (sole source) procurement prior approval requirements

# Procurement Contracts vs Subawards



For grant recipients with subawards, key compliance requirements include the following:

- Subawardee compliance with Uniform Administrative Requirements, Cost Principles, and Audit Requirements
- Progress and financial reporting by subawardee
- Collection of performance data from the subawardee

# Procurement Contracts vs Subawards

A close-up photograph of a person's hand holding a black pen with a gold nib, positioned over a document. The document is out of focus, showing some faint text and a grid-like pattern. The background is a soft, blurred light color.

For grant recipients with subawards, key compliance requirements include the following:

- Monitoring of subawardees
- Reporting subawards (over \$25,000) as required by the Federal Funding Accountability and Transparency Act (FFATA).

# Pass-through Entity's Responsibilities

A close-up photograph of a hand holding a black pen with a gold nib, writing on a white document. The background is blurred, showing what appears to be a desk or office environment.

- Ensure subrecipients use grant funds in accordance with all federal and program guidelines.
- Oversee the day-to-day operations of subrecipients to ensure they achieve performance objectives on schedule and within budget.
- Ensure subrecipients' timely submission of all documents necessary to meet all reporting requirements of the awarding agency (FFR, Progress Reports, etc.).
- Take the appropriate actions to get the subrecipient back on track, if problems arise.

# Pass-through Entity's Responsibilities



When monitoring subrecipients, prime recipients should:

- Ensure financial systems meet guidance in [2 CFR 200.302](#):
  - Identification of federal award and source of funding
  - Accurate, current and complete disclosure of financial results for each federal award
  - Records that identify the source and application of all federal funds by award that is supported by adequate documentation.
  - Adequate safeguarding of assets
  - Comparison of expenditures to approved budget amounts
  - Written procedures for determining allowability of costs and payment requests ([2 CFR 200.305](#))

# Pass-through Entity's Responsibilities

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## **Pre-award:**

- Ensure no conflicts of interest exists with known subawards and procurement contracts for funding decision makers.
- Establish process to ensure duplication does not occur among subawards.

## **Post-award:**

- Maintain adequate documentation of subaward or procurement contract status determination.
- Conduct risk assessment and monitor subaward recipients.



# Pre-Award Process Policies and Procedures

*A pass-through entity must* have established policies and procedures on how subawards will be made and subrecipients managed.

Policies and procedures must be in writing and clearly describe the pass-through entity's responsibility for pre-award and post-award requirements.



# Pre-Award Process



## *A pass-through entity must:*

- Decide upon the appropriate type of vehicle for the services needed (i.e., subaward, contract, etc.).
- Have a method for announcing the specific funding opportunities, eligibility requirements and the allotted timeframe to apply.
- Have a process for reviewing each subrecipient's eligibility for federal funding.
  - Include the criteria to be used to evaluate each application.

# Pre-Award Process Risk Assessment




*A pass-through entity should:*

- Perform a risk-assessment of applicants prior to awarding funds - Not a federal requirement, but highly recommended.
- Evaluate the risk posed by applicants before they receive an award.

Consider such elements as:

- Applicant's eligibility or the quality of its application;
- Financial stability;
- Quality of management system;
- History of performance; and
- Audit findings.

*Note: The evaluation elements above must be described in the announcement of funding opportunities (solicitation).*



# Pre-Award Process

## Risk Assessment (*cont.*)

- The results of the risk assessment can assist the pass-through entity in determining whether additional terms and conditions should be imposed on the award.
- The subrecipient agreement must clearly identify the federal award information, compliance requirements, applicable terms and conditions, and any supplemental requirements imposed by the pass-through entity.
- The pass-through entity must ensure that subrecipients are not suspended or debarred by the federal government prior to making the award.
- The subrecipient agreement must include specific data elements such as Federal Award Identification, etc.
  - A complete list of those data elements can be found in *Title 2 CFR 200.331(a)*.

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# **Requirements for Pass-through Entities**

*Post-Award Process*

*Risk Assessment*



# Post-Award Process Risk Assessment

- The pass through entity should perform a risk assessment of each subrecipient for noncompliance with federal requirements and the terms and conditions of the subaward.
  - To determine the appropriate level of monitoring needed.
- The attributes used by the pass-through entity to evaluate the overall risk of their subrecipients should be customized to suit the specific program.
- There are a number of different attributes to consider when assessing risk. The final score should clearly identify the risk level as either high, medium, or low.

# Post-Award Process Risk Assessment *(cont.)*

- Pass-through entity should develop a checklist to determine risk levels and the reason for assigning each subrecipient into risk categories.

<b>Subrecipient Risk Factors:</b>	<b>1</b>	<b>2</b>	<b>3</b>
Confidential Funds/Petty Cash			X
Subaward Amount \$25K <	X		
Delinquent Reports		X	

- The overall level of risk identified should dictate the frequency and depth of the monitoring practices to include ways to mitigate risk.



## Post-Award Process Risk Assessment *(cont.)*

- Some additional items a pass-through entity may also want to consider when performing a risk assessment include, but are not limited to:

General Assessment	Legal Assessment	Financial Assessment
<ul style="list-style-type: none"><li>• Award amount</li><li>• Matching funds</li><li>• New subrecipient,</li><li>• Budget modification requests</li></ul>	<ul style="list-style-type: none"><li>• Past suspension or debarment</li><li>• Federal debt owed</li></ul>	<ul style="list-style-type: none"><li>• Delinquent reports</li><li>• Recent audit opinion</li><li>• Received financial monitoring visit from federal government</li></ul>



## **Post-Award Process Risk Assessment (*cont.*)**

- The assessment of these attributes can provide the basis for developing a monitoring plan and a strategy for monitoring subrecipients.
- While this process is not all inclusive, it should give pass-through entities a starting point for assessing risk and developing a monitoring plan.



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# **Requirements for Pass-through Entities**

## **Post-Award Process Subrecipient Monitoring**



# Post-Award Process Subrecipient Monitoring

- The pass-through entity's monitoring plan should include:
  - Subrecipients to be monitored
    - A higher risk subrecipient should be monitored more extensively than a lower risk sub-recipient
  - Type of monitoring
    - On-site or in-house review
  
- Effective implementation of the monitoring plan may also result in the identification of potential areas for training and technical assistance.

# Post-Award Process

## Subrecipient Monitoring (*cont.*)

- Pass-through entities should develop monitoring objectives to ensure subrecipients:
  - Carry out program activities as stipulated in the agreement;
  - Have adequate internal controls to protect federal funds;
  - Claim reimbursement for costs that are allowable, reasonable, allocable, and necessary under program guidelines;
  - Identify any conflicts of interest that exist; and
  - Maintain required supporting documentation/records.



# Post-Award Process

## Subrecipient Monitoring (*cont.*)

- In preparation for an on-site visit, the pass-through entity should review all documentation, such as:
  - Subrecipient's application for funding;
  - Written agreement with the subrecipient;
  - Financial and progress reports;
  - Drawdown history (payments made to the subrecipient); and
  - Copies of recent audit reports.
  
- The result of this review may inform the pass-through entity about the subrecipient's operations and identify potential problem areas to examine during the on-site visit.

# Post-Award Process

## Subrecipient Monitoring (*cont.*)



- There are seven steps to a monitoring visit:
  - Notification
  - Entrance conference
  - Supporting documentation, data gathering and analysis
  - Exit conference
  - Follow-up
  - Corrective action plan (if applicable)
  - Closure of site visit



# Post-Award Process

## Subrecipient Monitoring (*cont.*)

- ***Notification*** - Send a formal notification letter at least several weeks before the visit to:
  - Confirm dates and scope of review
  - Provide details of documentation needed for the review
  - Specify expected timeframe for the review
  - Ensure key officials are available during the review

# Post-Award Process

## Subrecipient Monitoring (*cont.*)



- ***Entrance Conference*** – Hold on-site with the appropriate subrecipient staff (i.e. financial, program, director) prior to starting any monitoring activities.
  - Subrecipient staff should have a clear understanding of the purpose, scope, and schedule for the monitoring visit.
  
- ***Documentation, Data Gathering and Analysis*** – Track each step followed during the review process, document conversations with subrecipient staff, and inspect the progress of the actual project/program.
  - Explain the basis for any findings and identify the source(s) of information used to arrive at your conclusion(s).

A hand holding a black pen with a gold nib, writing on a document. The background is blurred, showing a desk and some papers.

# Post-Award Process

## Subrecipient Monitoring (*cont.*)

- ***Exit Conference*** – Meet with key officials to present the tentative findings noted from the financial review.
- The exit conference should cover the following objectives:
  - Present preliminary results of the site visit
  - Provide an opportunity for subrecipient to discuss any disputed findings
  - Obtain additional documentation from subrecipient to clarify or support their position
- For findings discussed, there should be a clear understanding of any remaining action(s).



# Post-Award Process

## Subrecipient Monitoring (*cont.*)



- ***Follow-up Letter*** – Use to create a permanent record of those findings not resolved during the exit conference.
  - Clearly describes deficiencies and recommendations, if the subrecipient is experiencing problems or failing to comply with federal requirements or program guidelines.
  - Includes deadlines informing subrecipients when a written response describing their proposed resolutions to any findings is due.
  - Should be mailed to the sub-recipient *within an established timeframe* after the exit conference.
- Develop the follow-up letter using standardized language for the opening paragraphs and for the sections on findings, corrective action, concerns and recommendations.



# Post-Award Process

## Subrecipient Monitoring (*cont.*)

- ***Corrective Action Plan*** – List each finding and any corrective action taken.
  - If any findings were not corrected or partially corrected, the reason and timeframe for each resolution must be included.
  
- ***Closure of Site Visit*** – If adequate documentation is received to resolve each finding, send a closure letter to close the site visit.

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# **Requirements for Pass-through Entities**

## **Post-Award Process Remedies for Subrecipient Noncompliance**

# Post Award Process

## Remedies for Subrecipient Noncompliance

- If a subrecipient doesn't comply with federal statutes, regulations or the terms and conditions of the subaward, the pass-through entity can impose additional conditions.
- If noncompliance cannot be remedied by imposing additional conditions one or more of the following actions can be taken:
  - Temporarily withhold funds pending correction of the deficiency;
  - Disallow all or part of the activity not in compliance;
  - Wholly or partly suspend or terminate the subaward;
  - Initiate suspension or debarment;
  - Withhold future subawards; or
  - Other legal remedies that may be available.

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# **Requirements for Pass-through Entities**

## **Post-Award Process Closeout Requirements**



# Post-Award Process

## Closeout Process

- The pass-through entity may approve an extension of the period of performance (consistent with DOJ Grants Financial Guide).
  - Send request for award extension to the award granting agency.
  - Prior approval must be granted by the award granting agency.
  
- The pass-through entity must:
  - Closeout the subaward when all applicable administrative actions and all grant related work have been completed.
    - Closeout must be completed within 90 calendar days after the end of the period of performance.
  - Require the subrecipient to submit all financial, performance, and other reports to the pass-through entity within a specified time after the end date of the period of performance.



# Post-Award Process

## Closeout Process (*cont.*)

- The pass-through entity must (*cont.*):
  - Make prompt payments to subrecipients for allowable reimbursable costs charged to the federal award.
  - Establish procedures for the closeout process that address refunding excess cash and accounting for any real or personal property acquired with federal funds.

# OJP Monitoring

When monitoring awards with subrecipients, OJP will:

- Review the award recipient's written procedures for its subrecipient award process (pre-award, post-award monitoring, and closeout)
- Review the award recipient's current subrecipient risk assessment and monitoring plan
- Verify that the awardee is conducting subrecipient monitoring
- Verify that the awardee maintains adequate subrecipient files
- Verify that all subrecipients are authorized
- Verify that all subrecipients have been reported in compliance with FFATA reporting requirements





# Audit and Monitoring – Common Findings

- Inadequate policies and procedures
  - Internal controls ([2 CFR 200.303](#))
  - Procurement
  - Subrecipients
- Inaccurate and/or late financial or performance reports
- Unallowable expenditures
  - Unsupported
  - Unauthorized
  - Unreasonable



# Recurring OIG Findings

*Pass-through entities are not:*

- Establishing policies and procedures on how subawards will be made and subrecipients managed.
- Ensuring subrecipient monitoring procedures are adequate and implemented effectively.
- Adequately monitoring subrecipients to provide reasonable assurance that they comply with the terms and conditions of the award.
  - Provide financial training and assistance to staff involved with the oversight of Subrecipients.
  - Ensure resources are available to provide adequate monitoring.

# Recurring OIG Findings (*cont.*)



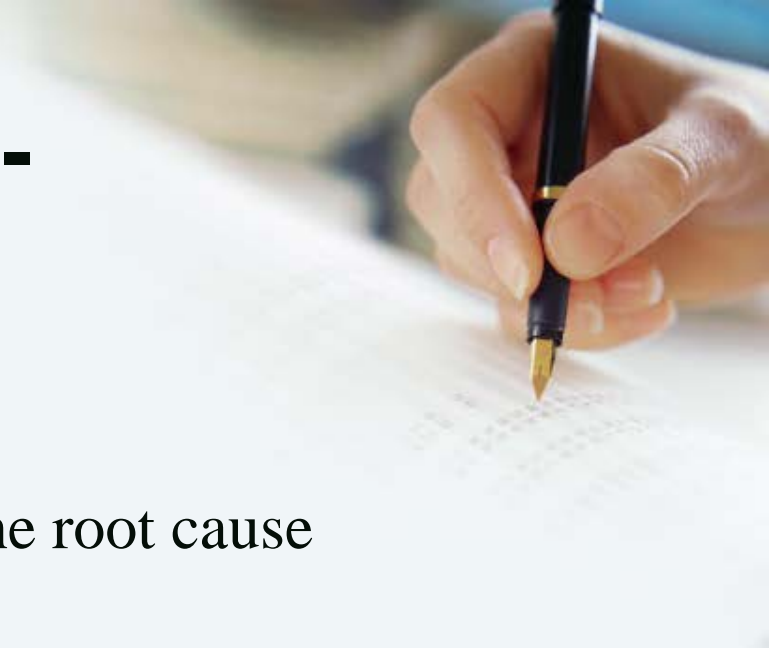
*Pass-through entities are **not**:*

- Establishing procedures to ensure subrecipients comply with Single Audit Act requirements and take appropriate action on relevant findings in subrecipient audit reports.
- Meeting FFATA reporting requirements.

# Audit and Monitoring - Resolution

## Corrective Action

- Review finding and determine the root cause
- Research guidance
- Develop plan to document policy and procedure
- Implement plan
- Provide documentation to support effective implementation
- Subsequently test implementation to ensure effectiveness



# Resources

- Uniform Guidance ([2 CFR 200](#))
- [Subawards under OJP Awards and Procurement Contracts under Awards: A Toolkit for OJP Recipients](#)
- [Checklist to Determine Subrecipient or Contractor Classification](#) (OJP)
- [Sole Source Justification Fact Sheet and Sole Source Review Checklist](#) (OJP)



# Resources

- [DOJ Grants Financial Guide](#)
- [OJP Training and Technical Assistance](#)



# Contact

Lucy Mungle

Risk Management Analyst

Office of Justice Programs

Office of Audit, Assessment and Management

202-353-7152

[Lucy.Mungle@usdoj.gov](mailto:Lucy.Mungle@usdoj.gov)



# Oregon Victim Service Grant Monitoring Process



# Introductions

- \* Mike Maryanov, Grant Section Manager
- \* Oregon Department Justice, Crime Victim and Survivor Services Division
  - \* Note the name change! And be wary but patient with any name-change typos. They're in the materials.
  - \* In addition to Grants, CVSSD manages Compensation along with a Revenue Section, Victims' Rights, Human Trafficking, Post Conviction, and the DV Resource Prosecutor

# CVSSD Grant Unit Scope of Grants

- \* State Grants

- \* Child Abuse Multidisciplinary Intervention Fund (CAMI)
- \* Criminal Fine Account (CFA)
- \* Oregon Domestic and Sexual Violence Services (ODSVS)

- \* Federal Grants

- \* VOCA
- \* VAWA
- \* SASP
- \* JRJ

# CVSSD Grant Unit Scope of Grants

- \* Competitive and non competitive funding to
  - \* Non-profits including DVSA's, CACs, Legal Aid, and population providers that don't fit into "DVSA" or "CAC" such as Elders in Action and Parents of Murdered Children
  - \* Government (County District Attorney-based) Victim Assistance Programs
  - \* Federally Recognized Tribes
  - \* Recently expanded funding to include Campus Sexual Assault Intervention and will be exploring inroads for new underserved providers

# Brief Disclaimer about Our Monitoring

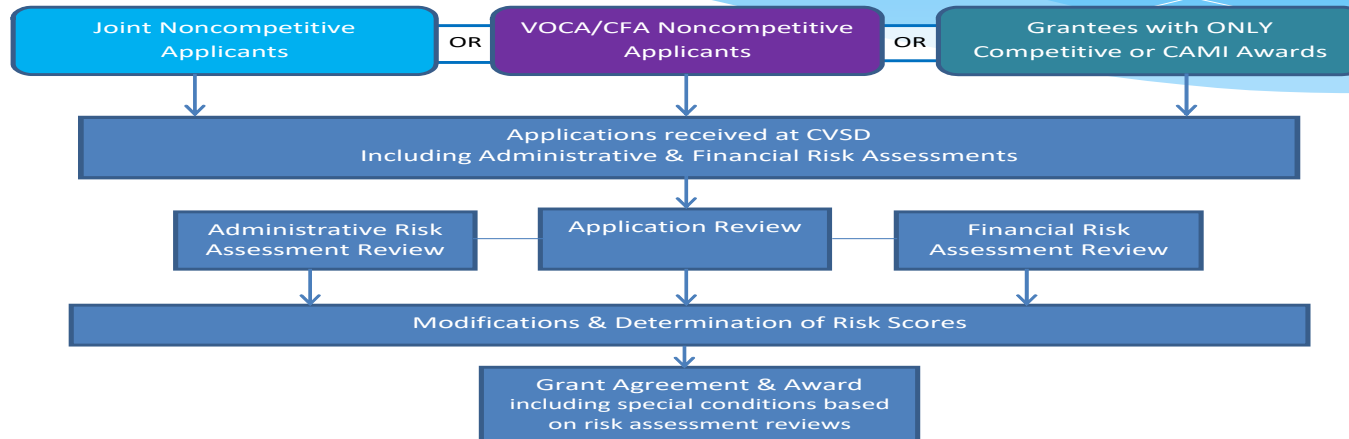
- \* As of 2016, we were QUITE behind in getting monitoring visits done!
  - \* We have lots of web and in-person TA and related contact with programs, but... monitoring!?
  - \* Time for invigorating the process
    - \* Developed new policy
    - \* Developed and incorporated Risk Assessments
    - \* Built in a separate financial report verification process, separate from formal monitoring / visits.

# CVSSD's New Monitoring Policy

- \* Bearing in mind the ongoing need for TTA-related grantee contacts, the new policy:
  - \* Starts with self-administered Financial and Programmatic Risk Assessments
    - \* Low / Medium / High results determine the timing and intensity of monitoring contacts
      - \* In Person, or desk review for fiscal, and/or policy, and/or both within specified time frames
      - \* Financial Report Verifications occur every two years regardless of risk score.

# CVSSD's New Monitoring Policy Flow Chart

## CVSSD Grant Monitoring Process



Proposed Schedule							
	<i>Early in year one:</i>	<i>Later in Year One:</i>	<i>Once every 4 years:</i>		<i>Early in year one:</i>	<i>Later in Year One:</i>	<i>At least once every grant cycle:</i>
Year One Quarters 1 - 4	Administrative Policies & Procedures Review On-site Programmatic Review	Administrative Policies & Procedures Review	Administrative Policies & Procedures Review On-Site Programmatic Review		Financial Policies & Procedures Review Financial Report Verification	Financial Policies & Procedures Review Financial Report Verification	Financial Report Verification*
Year Two Quarters 5 - 8	Follow-Up	On-site Programmatic Review**			Financial Report Verification	Financial Report Verification*	<i>Once every 4 years:</i> Financial Policies & Procedures Review

\* A second Financial Report Verification may be requested at the discretion of the fund coordinator.

\*\* An On-site Programmatic Review may be scheduled at the discretion of the fund coordinator.

# Division of Labor on the CVSSD Grant Unit

- \* Fourteen people on the overall grant team
  - \* CAMI excluded, eight Fund Coordinators and three support staff manage subawards to subrecipients in a county-based structure
    - \* 36 counties in Oregon
    - \* FCs are assigned to counties, and manage all the grants that go to the programs in those counties.
      - \* Many subs have multiple awards with us
      - \* On average, each FC has about 70 grants
      - \* Each program has only one CVSSD FC

# Fund Coordinator Scope of Work

- \* We manage all aspects of the subaward process
  - \* Fiscal and Programmatic Monitoring
  - \* RFAs
  - \* Application, Progress Report, and Financial Report Review
    - \* Includes running competitive processes
  - \* Training and Technical Assistance
  - \* Policy Drafting and related admin work



# Fund Coordinator Scope of Work

- \* Again, not counting CAMI (b/c we treat that program singularly), the eight FCs are responsible for:
  - \* 170 subrecipients
  - \* 539 subawards (includes state and fed awards)
- \* 127 monitoring contacts in 2017, not counting TA visits
  - \* 35 in-person visits
  - \* 4 full desk audits
  - \* 88 Risk Assessments

# Wow, that's a lot of stuff!

- \* We could use help with fiscal monitoring
- \* Options we've explored to help clear fiscal off plates include:
  - \* ODOJ Charitable Activities Section
  - \* ODOJ Fiscal Services Section
    - \* We work with Fiscal to help us internally with budgeting and payments, but neither section is able to help with monitoring
  - \* With new VOCA awards to campuses for sexual assault intervention, we're now working with Oregon Sexual Assault Task Force as a pass-through to do monitoring and TA with the campuses.

# New Plans to Help

- \* Kay Sohl Trainings
- \* New Recruitments
  - \* Policy and Special Project Coordinator
  - \* Compliance Coordinator
  - \* Honing the pass-through process

# Common Findings

- \* Programs in the field struggle with:
  - \* Direct Time Keeping
  - \* Indirect Cost Rates
  - \* Program Income
  - \* Confusion re: Board roles and oversight
- \* In the not too distant past, we saw a few dabbling in prevention activity, such as volunteers giving Darkness to Light training, but that was a cleaner fix than addressing the complexities of compliance.

# Contact Information

- \* Mike Maryanov, Grant Section Manager
  - \* [mike.v.maryanov@doj.state.or.us](mailto:mike.v.maryanov@doj.state.or.us)
  - \* 503-378-5307
- \* Marjorie Doran, VOCA Lead
  - \* [marjorie.doran@doj.state.or.us](mailto:marjorie.doran@doj.state.or.us)
  - \* 503-378-5059





		<b>Subgrant Award Report</b>								
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		<b>CLEAR</b>								
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**Correspondence**  
Request for Checks  
Important Emails



		Correspondence								
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**Grant Adjustment**

GAN Request

GAN Approval



			Grant Adjustments							
			CLEAR							



## Supporting Documentation

Personnel

Job Descriptions

Personnel Form

Periodic Certification of Personnel (100% funded personnel requires every 6 months)

Professional and Contractual Services

Consultant Contractual Services Contract

Facilities/Rental

Facilities and Rental Space Contract or Lease (if used as in kind match, supporting documentation value, properly authorized agreement from donating facility)



Equipment

Property Inventory Form (upload in OKGrants within 30 days of purchase)

Receipts

Required Policies (e.g. Rental Assistance and Cellphone policies)

A-5 Project Income Quarterly Status Report

VAT or equivalent training

MOUs/Letters of Support

Special Conditions



				Supporting Documentation					
				CLEAR					



**Quarterly PMT Reports**



					Performance Measures					
					CLEAR					



# Match

Match Ledger

Supporting Match Documentation (e.g. personnel and volunteer timesheets)



						Match				
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## July

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

Receipts should match what is on the ledger

Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



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**August**

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

Receipts should match what is on the ledger

Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



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**September**

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

Receipts should match what is on the ledger

Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



									September	
									CLEAR	







**October**

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

Receipts should match what is on the ledger

Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



										October
CLEAR	CLEAR	CLEAR	CLEAR	CLEAR	CLEAR	CLEAR	CLEAR	CLEAR	CLEAR	CLEAR





**November**

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

Receipts should match what is on the ledger

Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



November										
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**December**

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

Receipts should match what is on the ledger

Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



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## January

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

Receipts should match what is on the ledger

Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



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## February

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

Receipts should match what is on the ledger

Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



			February						
			CLEAR						





**March**

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

Receipts should match what is on the ledger

Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



				March						
				CLEAR						





**April**

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

Receipts should match what is on the ledger

Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



					April					
					CLEAR					





**May**

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

Receipts should match what is on the ledger

Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



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## June

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

Receipts should match what is on the ledger

Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



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**July**

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

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Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



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**August**

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

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Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



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**September**

MFR

VOCA Ledger

Corresponding Documentation as Applicable:

Timesheets (personnel, match personnel, volunteers)

Paystubs

Travel vouchers/claims/receipts for per diem, lodging, registration

Receipts should match what is on the ledger

Supplies/Operating receipts

Equipment Receipts

Professional and Contractual Services timesheet or invoicing

Other Budget Category Receipts



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Count	Location	Application Name	Risk Assessment	Monitor Assigned	Single Audit Required? Yes/No	When does Fiscal Year End?	Has the Audit been completed & Received? Yes/No	Site Visit Date	Programmatic	Financial Desk Review	Both Programmatic and Financial	Desk Review	Follow up Site Visit	Follow up Site Visit	Follow up Site Visit	Follow up Site Visit	Date Final Letter Sent	Time from visit to letter in days	Significant Findings	Notes	VOCA Binder Received	VOCA Dividers Received
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Count	Location	Application Name	Federal Grant Numbers	Monitor Assigned	Single Audit Required? Yes/No	When does Fiscal Year End?	Has the Audit been completed & Received? Yes/No	Date Reviewed by VOCA Monitor	Is there Project Income? Yes/No	IDC Negotiated Rate	IDC Expiration Date	IDC Spans Grant Cycle	IDC Negotiated Rate - Date New Received	Risk Assessment	Risk Upon Award	Risk Change	Reason for Risk Change	Site Visit Date	New Subgrantee Site Visit Date	Programmatic On-Site	Financial Desk Review	Follow up Site Visit	Follow up Site Visit	Follow up Site Visit	Financial On-Site	Both Programmatic and Financial	Financial Desk Review	Other Periodic Review	Follow up Site Visit	Date Final Letter Sent	Time from visit to letter in days	Significant Findings	Notes	VOCA Binder Received	VOCA Dividers Received	Late Start?	Late Financials	Late PMT	Late PMT	Late PMT	Closure	Zip file saved in OKGrants
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Count	Location	Application Name	Grant Num	Federal Grant Numbers	Federal Award Numbers	Monitor Assigned	Single Audit Required? Yes/No	When does Fiscal Year End?	Has the Audit been completed & Received? Yes/No	Date Reviewed by VOCA Monitor	Is there Project Income? Yes/No	IDC Negotiated Rate	IDC Expiration Date	IDC Negotiated Rate - Date New Received	IDC Spans Grant Cycle	Risk Assessment	Risk Upon Award	Risk Change	Reason for Risk Change	Site Visit Date	New Subgrantee Site Visit Date	Programmatic On-Site	Financial On-Site	Both Programmatic and Financial	Financial Desk Review	Other Periodic Review	Follow up Site Visit	Follow up Site Visit	Follow up Site Visit	Follow up Site Visit	Date Final Letter Sent	Time from visit to letter in days	Significant Findings	Date Resolution letter sent	Notes	VOCA Binder Received	VOCA Dividers Received	Late Start?	Zip	Certified Assurances	EEO/AA	Communication Method	SAR	Date Significant Findings Were Resolved	Close-Out
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