

Office for Victims of Crime

VOCA Administrator Regional Meeting | SUMMARY

MEETING DATE	May 17, 2018
MEETING LOCATION	Washington, DC
MEETING CALLED BY	Marilyn Roberts, OVC Deputy Director
TYPE OF MEETING	VOCA Administrator Regional Meeting
TOPICS	Innovative Programs; Challenges; Monitoring of VOCA Recipients and Subrecipients.
PARTICIPANTS	VOCA Administrators: Debbie Bousquet-VanWinkle (AR); Terica Jones (DE); Kellie Rabenhorst (NE); Liam Downey (MA); Amy Marino (NJ); John Mahoney (VA); Robert Thornton (GA); Tanya Pitman (New Hampshire); Jade Palin (IN); Diane Barber-Whitaker (NC); Burke Fitzpatrick (NC); Amanda Powers (WI); Valerie McMahon (PA); Jim Morgan (CT); Ginny Miller (NY); Michelle Garcia (DC); Zena Hooper (TX); Leslie O'Reilly (MI).
PRESENTERS:	Michelle Garcia (Director, DC Office of Victim Services and Grants); Zena Hooper (Director of Victim Services, Texas Criminal Justice Division); Lucy Mungle, Policy Analyst, OJP Office of Audit, Assessment, and Management; Leslie O'Reilly (VOCA Program Specialist, Michigan) and John Mahoney (VOCA Administrator, Virginia).
OVC PERSONNEL:	Darlene Hutchinson (OVC Director); Marilyn M. Roberts (OVC Deputy Director); Toni Thomas (OVC Associate Director); Tiffany Graham (OVC Program Specialist); Joel Hall (OVC Program Specialist); Shelby Crawford (OVC Program Manager); Kate Peterson (OVC Attorney Advisor); Adrian Wilairat (OVC Writer-Editor); Jo Johnson (OVC Fellow); Heather Warnken (OVC Fellow).
FACILITATOR:	Mary Vail Ware (OVC TTAC)
ATTENDEES IN PERSON:	Diane Alexander (OVC TTAC); Jennifer Shewmake (OVC TTAC); Steve Derene (NAVAA).
ATTENDEES BY PHONE:	Eugenia Pedley (OVC Program Manager); Marti Kovener (OVC TTAC); Kathy Buckley (Council of State Governments).

WELCOME, OVERVIEW, AND INTRODUCTIONS - MARILYN ROBERTS, OVC DEPUTY DIRECTOR

Marilyn welcomed participants attending in person and on the phone.

- 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.
- The VOCA compensation and assistance solicitations were recently posted; applications are due by May 31st. We will process them as quickly as we can.
- 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.

Darlene Hutchinson welcomed participants.

- We want to hear from all of you about your ideas and challenges. Synergy is key.
- As you know, the Fiscal Year (FY) 2018 appropriation bill has greatly increased the funds available from the Crime Victims Fund this year. OVC is considering using some of its discretionary funds to support training programs for states. This program would be funded through a competitive application process.
- The OJP forecaster provides helpful information about grants that might be released.

Mary Vail Ware provided an overview of OVC TTAC resources:

- TTAC has increased its focus on capacity building.
- Remember to access the MyVOCA Resources webpage.
- Use TTAC's speakers bureau and consultants.
- TTAC can provide in person and online learning
- Training is available to subgrantees too.

STATE ADMINISTRATOR PRESENTATION: MICHELLE GARCIA, DIRECTOR, DC OFFICE OF VICTIM SERVICES AND JUSTICE GRANTS – PERFORMANCE MEASURES

Michelle provided an overview of the DC Office of Victim Services and Justice Grants' (OVSJG) performance measures.

- Before FY 2015, each subgrantee individually determined performance data.
 - OVSJG was unable to clearly assess services provided or the impact of services.
 - OVSJG was unable to demonstrate the impact of funding.
- OVSJG developed standardized performance information. In FY 2016, grantees began collecting and reporting on standard outcome measures.
- Output measures:
 - Unique primary and secondary victims: gender, race and ethnicity, age, zip code, category of crime victimization, and type of service.
 - Number of outreach events and participants.
 - Number of trainings or continuing education events and participants.
 - Services for campus, military, and LEP victims.
 - Number of volunteers.
- Outcome Measures:

- Case Management and advocacy
- Crisis intervention and hotline
- Education and training
- Financial reimbursement or compensation
- Housing and shelter
- Language access
- Legal services
- Medical and forensic services
- Mental health services
- Outreach
- Prevention and community engagement
- Data Collection
 - Spreadsheetweb – platform for data collection that allows one to create databases out of spreadsheets in a cloud environment. One can export the data and use it to create tables and graphs.
 - Grantees seem to like spreadsheetweb and find it easy to use.
- How Does One Use Outcomes?
 - Identify needs for training and technical assistance (TTA).
 - Use the results in funding decision process: who is achieving the outcomes they say they are achieving.
 - Monitor new award recipients closely during the first year of award.
 - Use both quantitative and qualitative data: include narrative data from survivor feedback.
- Lessons learned:
 - This process takes time.
 - This process will require different iterations.
 - Be prepared for criticism from subgrantees.
 - Ensure grantees have the capacity to meet requirements (e.g., purchasing databases and training staff to use them).
 - Provide ongoing TTA.
 - OVSJG hired a consultant to work with subgrantees on completing spreadsheets. The consultant put together FAQs, how to's, and conducted an outreach tutorial and social media tutorial.

STATE ADMINISTRATOR PRESENTATION: MICHELLE GARCIA, DIRECTOR, DC OFFICE OF VICTIM SERVICES AND JUSTICE GRANTS – INNOVATIVE PROGRAMS

Michelle provided an overview of (OVSJG's innovative programs.

- Two successful programs funded by OVSJG: Community Family Life Services and Fair Girls
- Community Family Life Services:
 - Transitional housing and services for formerly incarcerated women who are survivors of domestic and sexual violence.
 - Grantee has historically been funded to provide reentry services and establish partnerships with victim service providers to identify potential clients.

- The organization is VOCA funded and provides case management, therapy, housing, and transportation costs.
- Fair Girls
 - 1 of 3 human trafficking service providers funded by OVSJG.
 - Provides safe housing and services for girl and transgender female survivors aged 18-26 in DC.
 - The organization is VOCA funded and provides case management, advocacy, crisis intervention, and housing.
- Significance
 - Some providers, especially small ones, do not have experience with fiscal responsibility and understand the requirements. To address this reality, create links between those organizations and larger ones that can serve as fiscal agent.
 - Funding small organizations helps them build capacity. OVSJG gives small organizations local money as seed money to build capacity and train them. OVSJG also pairs such small organizations with experienced ones to serve as mentor organizations. After capacity is built, the small organization then has an improved chance of applying for and receiving VOCA dollars.

STATE ADMINISTRATOR PRESENTATION: ZENA HOOPER, DIRECTOR OF VICTIM SERVICES, TEXAS CRIMINAL JUSTICE DIVISION – COLLEGE VICTIM SERVICES INITIATIVE

Zena provided an overview of the Texas Victim Services Division's College Victim Services Initiative.

- Issue:
 - In 2016, several colleges in Texas were under investigation for potential violations of Title IX.
 - Very few colleges had victim-centered advocacy.
 - Perpetrators often remain at the university.
 - Victims often experience poor academic performance and subsequently drop out of college.
 - Mandatory reporting by university employees was not a standard practice.
 - Outreach was inconsistent.
- Texas Victim Services Division Grant:
 - Enables anonymous reporting by attaching a confidential advocate to grant funding.
 - These confidential direct services providers are not required to disclose client or case information to any entity, including a campus Title IX officer, except when the release of such information is required by law.
 - Duties of the confidential advocate include:
 - Address immediate and long-term issues;
 - Manage the non-counseling aspects of the crime;
 - Mitigate the impact of disruptions and distractions; and
 - Assist in resolving issues related to the crime and the effect of it on the victim's college experience.

- Grant applicants must certify that:
 - All staff compensated through program are confidential direct service providers;
 - A victim must not be coerced or required to file a report or disclose information about the crime as a condition of receiving services from the confidential provider;
 - Procedures are in place to provide wraparound victim services;
 - Plan for a robust outreach program; and
 - Plan to educate university staff on confidential advocacy.
- Lessons learned:
 - Formalized outreach plans are key.
 - Strategies for program monitoring should be part of program development.
 - Training and Technical Assistance (TTA) needs to be incorporated.
- Grant increases
 - Eleven grants were awarded in 2016.
 - This number will significantly increase in 2018.

STATE ADMINISTRATOR PRESENTATION: ZENA HOOPER, DIRECTOR OF VICTIM SERVICES, CRIMINAL JUSTICE DIVISION – CRISIS RESPONSE TEAMS

Zena provided an overview of Texas Victim Services Division's Statewide Crisis Response Teams (CRTs).

- Issue:
 - Texas lacked a coordinated, statewide response to address victim recovery and resilience after a critical incident.
 - Texas has experienced at least one critical incident in each year since 2014.
- Solution:
 - The Texas Victim Services Division grant developed a coordinated, statewide preparedness model to mitigate the trauma caused by critical incidents.
 - The goal was shifting the paradigm from "If/Then" to "When/Then."
- Targeted populations:
 - One model that is individualized for two populations:
 - Critical Incident Stress Debriefing (CISD) Teams to address primary and vicarious trauma experienced by first responders.
 - Crisis Response Teams (CRT) to address primary trauma experienced by victims and vicarious trauma experienced by care workers.
- VMOSA – Vision, Mission, Objectives, Strategy, Action
 - Vision – facilitate resiliency for communities affected by a critical incident.
 - Mission – incorporate the CRT model into the Incident Command System structure.
 - Objectives – readiness, response, and recovery.
 - Strategies – building statewide capacity, outreach, and modifying procedures.
 - Action plans – establish authority, conduct planning meetings, continue to improve procedures, and review current practices.
- Leadership and response structure:
 - There are two regional directors, each of whom has authority over four CRT regions.

- Eight regional coordinators have authority for planning, management, and development in their regions.
- Licensed counselors provide counseling immediately after an event.
 - They are assigned based on impact, skill, and need.
 - They are stationed in the Family Assistance Center.

GROUP DISCUSSION ON STATE ISSUES

Mary Vail Ware facilitated a group discussion by asking:

What types of new programs are you funding in your state?

- Massachusetts is funding surveys, needs assessments, and interviews with survivors.
- Nebraska is funding transitional housing programs, in which single family units are supported for up to two years.
 - This program includes wraparound services and case management to help with self sufficiency and supports expenses such as GED classes, books for colleges, uniforms for work, child care, and therapy.
 - Additionally, the program is hiring a victim advocate who can travel across the state to provide services to individuals in small towns who otherwise would not be served.
 - Nebraska also issued a tribal solicitation and hired a tribal liaison who functions as the main liaison with the tribes and attends tribes' quarterly meetings.
 - Nebraska also created a new division and increased the staff size to eight personnel.
- New York is supporting a civil legal network grant through which self-help tools are provided online. The program has a point of contact who can help victims navigate the tool, and also focuses on helping the most vulnerable victims.
- Indiana is funding an LGBTQ legal advocate to focus on serving that population with its civil legal needs.
- Several states fund elder victimization projects focusing on financial exploitation.
 - These programs have been successful.
 - These programs also face challenges with victims' wariness about coming forward to seek services and opposing family members or their primary caretakers. Victims are wary about the potential of losing their residences and often face physical problems.
- Virginia is funding six legal aid societies. It also has increased staffing through advertising positions, focusing on specific job responsibilities.
- Pennsylvania is funding:
 - Legal aid programs;
 - Continuing Legal Education with a trauma-informed aspect;
 - Antiviolence program, with culturally competent crisis responders, in Philadelphia; and
 - Victim advocate in the coroner's office.
- South Carolina has challenges with VINE (Victim Information and Notification Everyday).
 - VINE is a very effective system, but it is modernizing and will cost more.
 - South Carolina needs help with paying for the increased costs.
 - A few states use VOCA dollars to support VINE.

What concerns do you have about funding new programs?

- Many states faced difficulty in receiving approval from Governors' Offices to hire new staff. Some states even received cuts to victim services staff positions, even with increased funding.
 - State leadership is focusing on cutting programs and does not want to appear as if it is expanding government.
- Many states face challenges in building capacity, even with more funds. Additionally, one state did not receive authorization from the Governor's Office to reimburse programs, which led to months of non-payments to subgrantees.

What do new victim assistance programs and their staffs need?

- Many states need:
 - Increased funding for training.
 - Help with managing funding.
 - Addressing temporary housing.
 - Support for legal services.
 - New, upgraded, or larger office space.
 - Massachusetts was able to open a satellite office in a different part of the state because the rent was less expensive.
 - Help with planning for incidents of mass violence.
 - Register for OVC TTAC courses early. Many courses have attendance capped at 200 participants; often the waiting lists are as high as 300.
 - If your jurisdiction experiences an incident of mass violence, OVC will reach out. Be sure to answer the phone call or return the call; OVC can provide assistance and send consultants to help with your response.
- States face challenges including:
 - Building capacity.
 - Solution: Make the case that a position that needs to be created or filled is mission critical.
 - Receiving enough funding.
 - Working with new populations.
 - Working with populations with disabilities.
 - Working with older adults who are victims.
 - Funding for VINE.
 - Challenges addressing civil legal services, especially for the LGBTQ community.
 - Meeting the match requirement.
 - One strategy is to work with other state agencies to leverage their funds to serve as match.
 - Another strategy is to request match waivers from OVC.

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

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 A, "Office of Justice Programs: Requirement to Monitor Subrecipients."

STATE ADMINISTRATOR PRESENTATIONS ON MONITORING PRACTICES

Leslie O'Reilly (VOCA Program Specialist, Michigan) and John Mahoney (VOCA Administrator, Virginia) provided an overview of monitoring practices in their states. John also presented the results of a survey he conducted of VOCA Administrators. For more details of these presentations, please see Attachment B, "State Administrator Presentations on Monitoring Practices."

GROUP DISCUSSION ON MONITORING SUBRECIPIENTS

Mary Vail Ware facilitated a group discussion on the challenges that states face in monitoring subrecipients:

- Subgrantees are not used to monitoring.
- State agencies lack capacity to conduct monitoring.
- State leadership often does not understand the role of VOCA Administrators.
- It is challenging for leadership to recognize that financial monitoring is not enough but that programmatic monitoring is also key.
- Some offices still struggle with the professionalization of victim services, as opposed to victim services simply being a movement.
- There is frequent staff turnover and lack of enough personnel.
- Subrecipients worry about funding.
- Match is challenging.

CLOSING REMARKS

- Marilyn thanked participants for attending.
- Marilyn asked participants to contact her with any ideas about making these regional meetings more effective.
- Meeting minutes will be distributed and posted on the VOCA Administrators web page: <https://www.ovc.gov/VOCA-Administrators.html>.

OVC VOCA Administrator Meeting

May 17, 2018
Washington, DC

Presenter: Michelle M. Garcia, Director
DC Office of Victim Services and Justice Grants

Performance Measures

Innovative Programs

Overview



Office of Victim Services
and Justice Grants



The mission of the Office of Victim Services and Justice Grants (OVSJG) is to develop, fund, and coordinate programs that improve public safety; enhance the administration of justice; and create systems of care for crime victims, youth, and their families in the District.

SAA for:

- VOCA
- STOP
- SASP
- Coverdell
- Byrne JAG
 - PREA & SORNA
- RSAT
- Title II

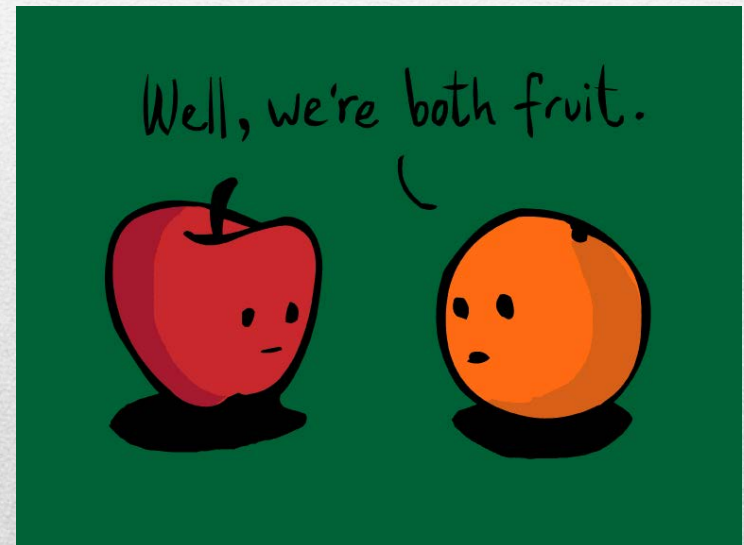
Mission



Performance Measures


Before FY2015

- Each grantee individually determined performance data
- Unable to clearly assess services provided
- Unable to clearly assess impact of services
- Unable to demonstrate impact of funding



Performance Measures

FY2014

- Grantees and OVSJG begin developing standardized performance information
 - Attempted to align with OVC & OVW reporting requirements
- 

FY2015

- Grantees begin collecting and reporting on standard data (output) measures
- 

FY2016

- Grantees begin collecting and reporting on standard outcome measures

Performance Measures

Unique primary and secondary victims

- Gender identity
- Race and ethnicity
- Age
- Zip code
- Category of crime victimization
- Type of service

Number of outreach events & participants

Number of trainings or continuing education events & participants

Services for campus, military, and LEP victims

Number of volunteers

Output Measures

Case
Management
and Advocacy

Crisis
Intervention
and Hotline

Education and
Training

Financial
Reimbursement
or
Compensation

Housing and
shelter

Language
Access

Legal Services

Medical and
Forensic
Services

Mental Health
Services

Outreach

Prevention and
Community
Engagement

Outcome Measures

Mental Health Services

- Reduction of trauma symptoms between T1 (first appointment) and T2 (subsequent pre-determined visit)
- Validated measure of provider's choice

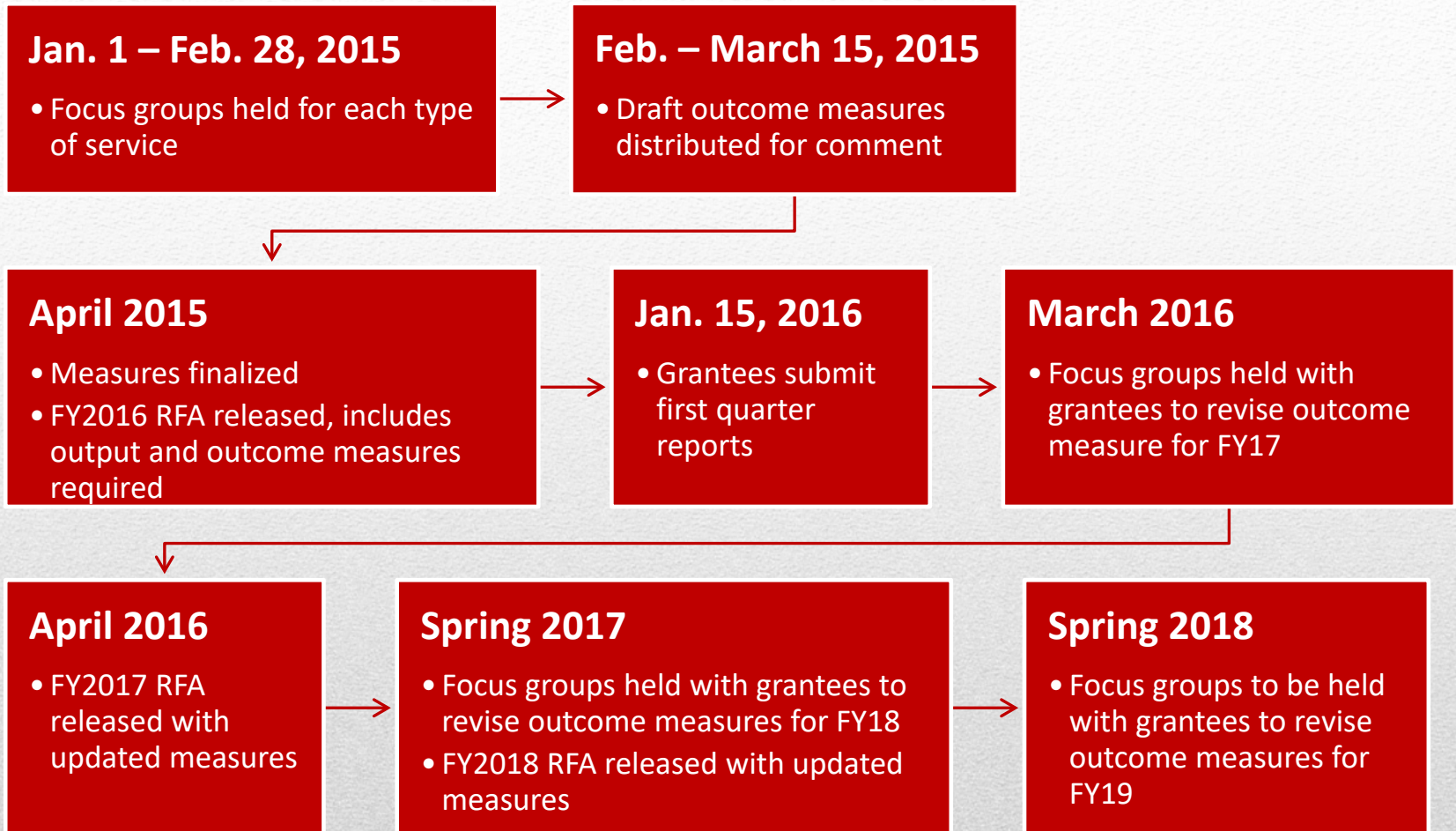
Case Management and Advocacy

- The victim demonstrates increased empowerment, resiliency, and coping skills
- Validated assessment tool of the provider's choice (e.g. resiliency scale, coping scale, empowerment scale)

Education and Training

- Participants demonstrate an increase in substantive knowledge, skills, or abilities
- Measured by mandatory pre-/posttests or substantive knowledge tests of the information learned during the training

Outcome Measures



Outcome Measure Process

Collection Platform



Housing

Who are you?			
Organization or agency		Email Address of Person Completing PMI Submission	Insert Email Address
Fiscal Year	▼	Grant Manager	Insert Email Address
Quarter	▼	Grant number for these outcome measures	

78. Victims Provided with Housing Services	
a. Number of unique new victims (primary and secondary) provided with housing services during the reporting period	
b. Number of unique continuing victims (primary and secondary) provided with housing services during the reporting period	

79. Nights of Safe Housing	
a. What is the aggregate number of nights of safe housing provided during the reporting period	
b. What is the average number of safe nights of housing provided to each victim served during the reporting period	

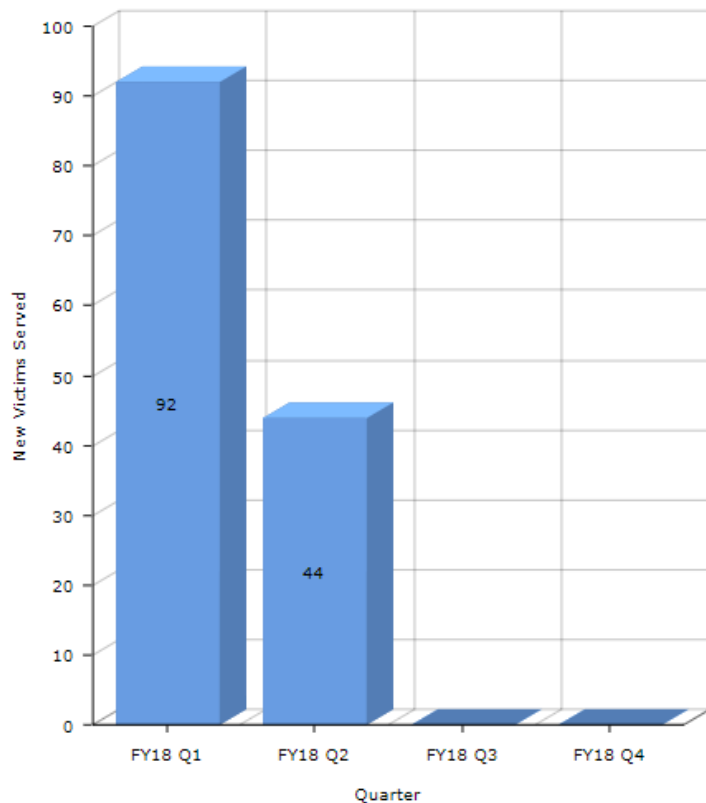
80. Of the number of new victims received into the housing program during the quarter, how many had sought services from your agency during this fiscal year?

82. Of the number of victims who left housing during the reporting period, what number left housing for:	
a. Safe and permanent housing	
b. Safe but temporary housing	
c. Tenuous housing	
d. Other shelter	
e. Other	
f. Unknown	
g. Deceased	

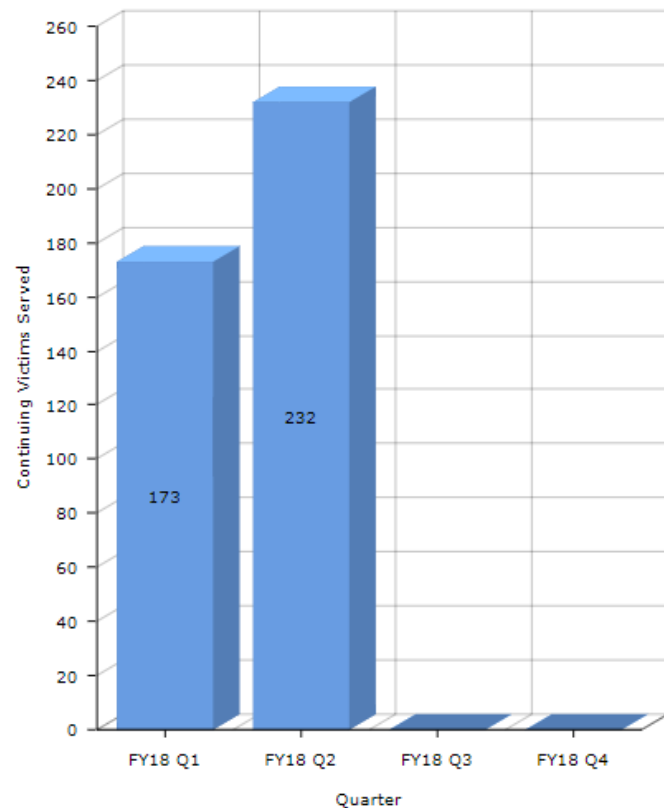
83. Do you have any positive qualitative observations to share from the victims that you served with housing services during this reporting period?

Housing PMI Data Outcomes

New Victims Provided with Housing Services

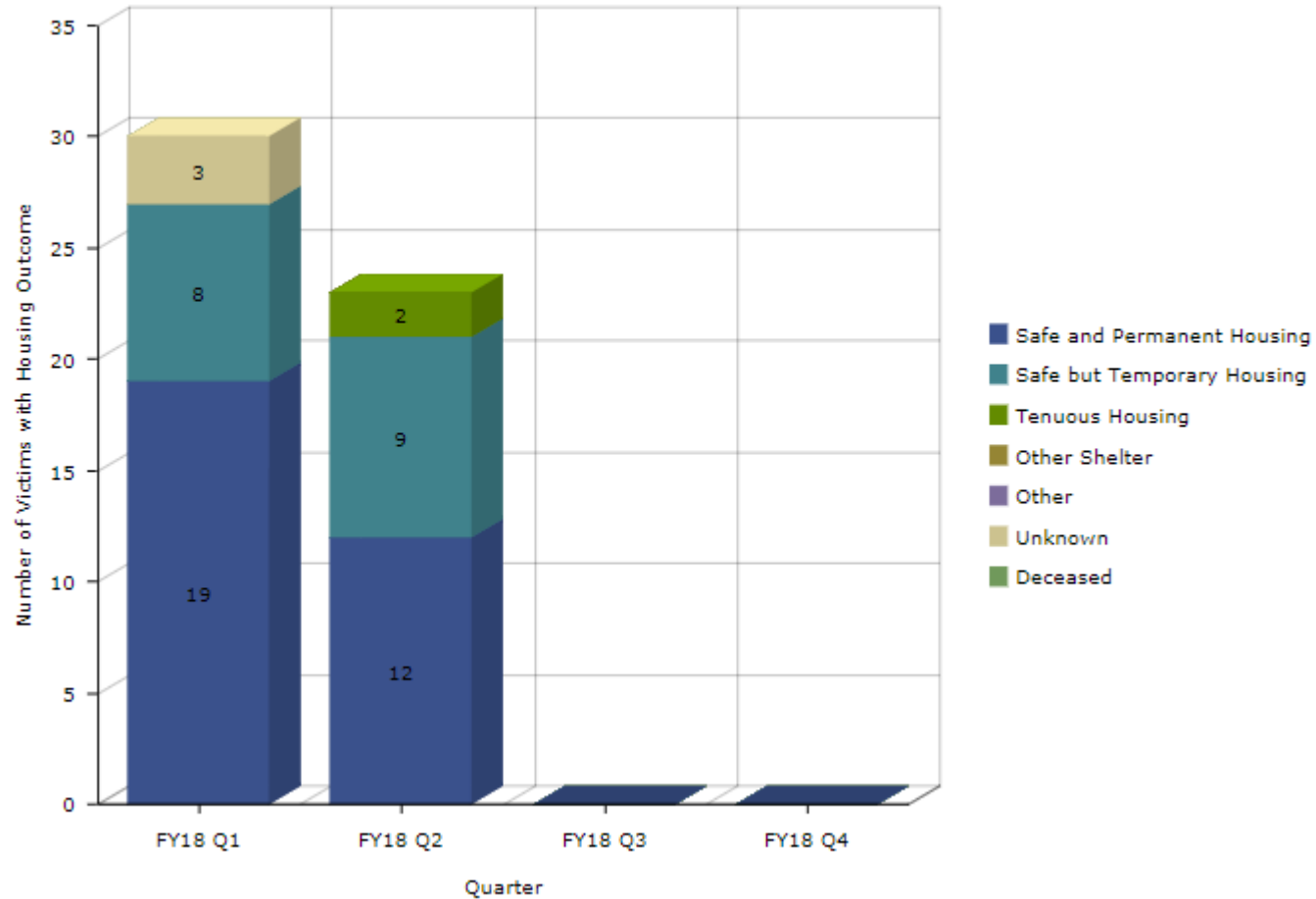


Continuing Victims Provided with Housing Services



Reports

Housing Outcomes for Victims Leaving Housing Programs



Reports

It takes time

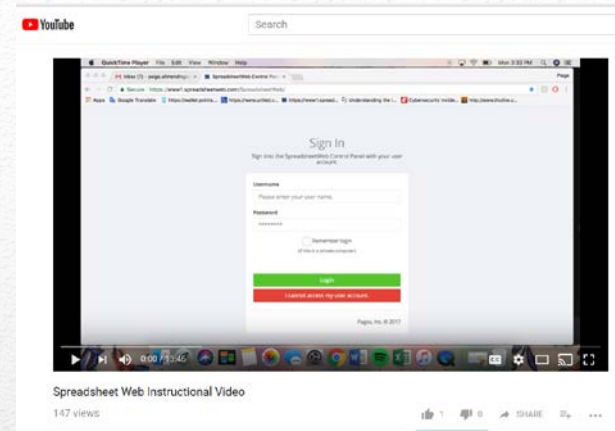
Has to be an iterative process

Be prepared for criticism and complaints

Ensure grantees have the capacity to meet requirements

Provide ongoing training and technical assistance

Lessons Learned



- Frequently Asked Questions (FAQs)
- Beyond the Basics: Collecting and Utilizing Sexual Orientation and Gender Identity Data Webinar Recording
- PMI Tutorial Facebook Outreach
- PMI Tutorial Twitter Outreach



Innovative Programs

COMMUNITY FAMILY LIFE SERVICES



Women's Reentry Transitional Housing and Victims Services Initiative

- Transitional housing and services for formerly incarcerated women who are survivors of domestic/sexual violence
- Grantee has historically been funded to provide reentry services; established partnerships with victim service providers to identify potential clients
- VOCA funded: case management, therapy, housing, transportation costs



Comprehensive Survivor Focused Services for Young Victims of Commercial Sexual Exploitation, Sexual Assault, and Human Trafficking

- 1 of 3 human trafficking service provides funded by OVSJG
- Safe, empowering housing and services for girl and transgender female survivors aged 18-26 in DC
- VOCA funded: case management, advocacy , crisis intervention, housing

**Victim Assistance
Network (VAN)**

SA & DV Coalitions

**Strategic planning
process
(OVC funded)**

**Juvenile Justice
Advisory Group (JJAG)**

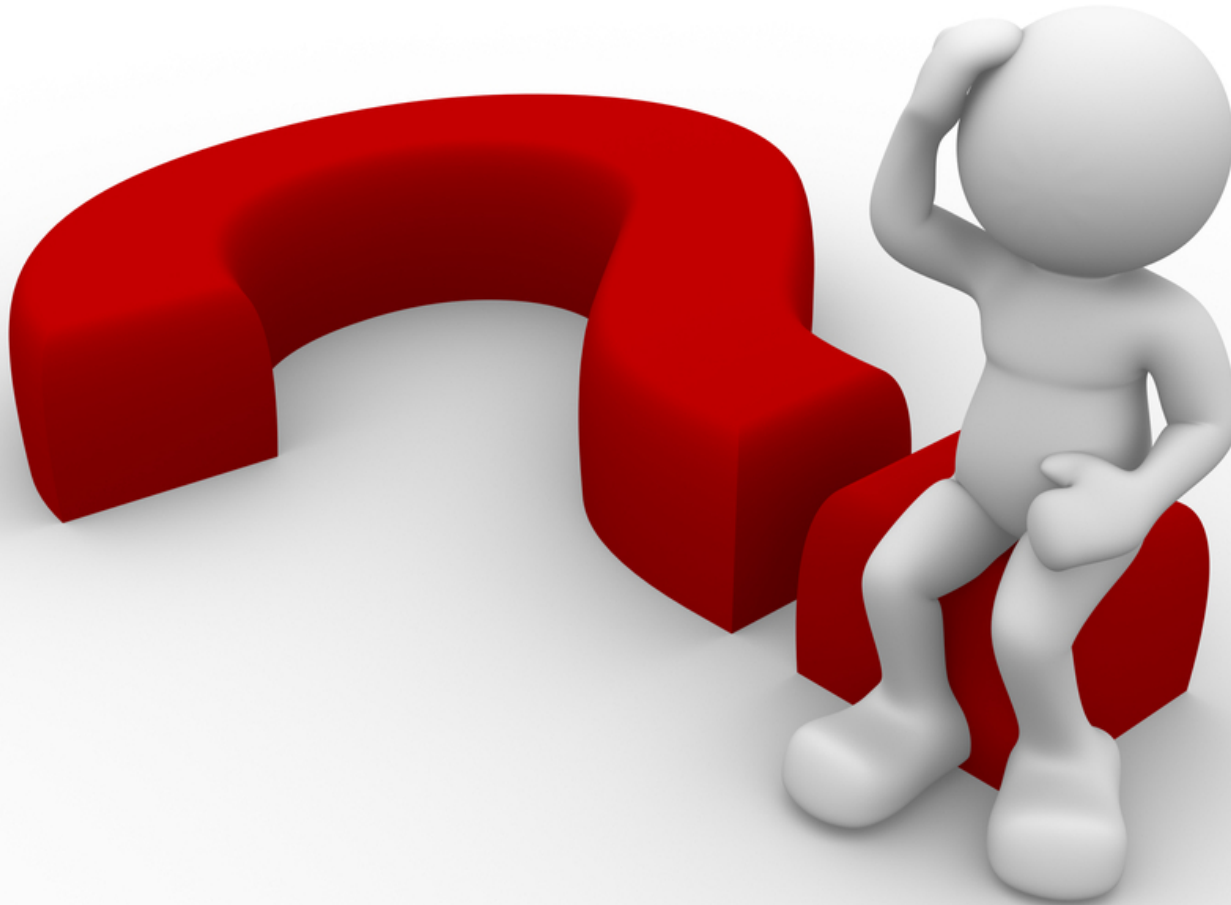
**Reentry Assistance
Network (RAN)**

**Byrne JAG strategic
planning process**

**Ongoing meetings
with community
members and CBOs**

Oversight hearings

Assessing Needs & Gaps



Question?



Criminal Justice Division
Office of the Governor

College Victim Services Initiative



Criminal Justice Division

Presenter: Dr. Zena Hooper

The Issue

- “Dear Colleagues” memo misinterpretation or misunderstanding
- University policies regarding mandatory reporting varied widely
- No real consistency in the treatment of victims
- Care not victim-centered; CJ focused
 - ❑ Forced or mandatory reporting
 - ❑ Little to no advocacy
 - ❑ Academics suffering – subsequent dropout



Background

- Several colleges were under Title IX investigations in 2016
- Research found very few had victim-centered advocacy
 - ❑ Even fewer offered “wrap-around” type follow up.
- Mandatory reporting by university employees seemed inconsistent
- Outreach was not strategically targeting



Grant Purpose

- Provide a means of anonymous reporting by attaching a confidential advocate to the grant funding

- Provide “what works” principles and practices to a sample of colleges
 - ☐ Major Universities
 - ☐ Small Universities
 - ☐ Historically Black Universities
 - ☐ Community Colleges



Confidential Direct Services Provider

Providers that are not required to disclose client or case information to any entity, including a campus Title IX officer and/or Coordinator, except when release of information is required by law.



What Do They Do Anyway?

- Duties include but are not limited to:
 - ☐ **Address** the immediate and long-term questions & issues
 - ☐ **Manage** the non-counseling consequences from the crime
 - ☐ **Mitigate** the impact of persistent distractions or interruptions
 - ☐ **Assist** in resolving matters related to the crime and its impact on the victim's college experience.



Program Parameters

- Applicant must agree to submit written documentation certifying
 - 1) All personnel compensated under the program are confidential direct services providers
 - 2) A victim may not be coerced or required to file a report or disclose information regarding their victimization with any entity **as a condition** of receiving services from a confidential direct services provider.
 - 3) Policy/procedure outlining the provision of wraparound services
 - 4) Plan for a robust outreach/awareness program
 - 5) Plan for educating university staff on confidential advocates and the referral process



Lessons Learned

- Formalized outreach is essential
 - ❑ Will utilize the “Ohio Method” for the next round
- Strategy for initial, individualized programmatic monitoring should be a part of the program development
- T&TA also needed to be built into development



Sample of University's Certification

To Whom It May Concern:

As the Authorized Official administering the Victim Assistance: College Campus Initiative Grant, I certify that all personnel compensated through OOG or match funds under the program are Confidential Direct Services Providers that maintain victim's confidentiality for all case information (written or oral) and shares information only at the victim's request and with the victim's informed consent, except when release of information is required by law.

Confidential Direct Services Providers compensated under the program shall not be required to disclose client or case information to any entity, including a campus Title IX officer and coordinator, except when release of information is required by law.

A victim may not be coerced or required to file a report or disclose information regarding their victimization with any entity as a condition of receiving services from a Confidential Direct Services Provider.

I understand that failure to comply with this certification may result in CJD, in its sole discretion, withholding reimbursement on personnel line items contained in the program budget until satisfactory evidence of compliance is provided.



Statewide Crisis Response Teams (CRT)



Issue that Needs to be Addressed

- There is no coordinated statewide response to address victim recovery and resilience after a critical incident.
- Critical incidents, like mass public shootings, are unfortunately becoming a part of our nation's fabric. Texas has had at least one critical incident a year since 2014:
 1. Apr 2014 – Ft. Hood
 2. May 2015 – Twin Peaks
 3. July 2016 – Dallas Ambush
 4. November 2017 – Sutherland Springs Church Shooting
 5. January 2018 – Italy School Shooting
 6. March 2018 – Austin Bombings



Solution

- Develop a coordinated, statewide preparedness model to mitigate the trauma experienced by these events
- We are currently functioning with an “**If/Then**” tenet; given the prevalence of these types of events, it would be in our best interest make a paradigm shift to “**When/Then**”



Targeted Populations

- One model that is individualized for two populations:
 - Critical Incident Stress Debriefing (CISD) Teams will address primary and vicarious trauma experienced by **first responders**
 - Crisis Response Teams (CRT) will address the primary trauma experienced by **victims** of the incident and the vicarious trauma experienced by **care workers**.



Vision, Mission, Objectives, Strategy, Action (VMOSA)



VMOSA

- **VISION** – Foster resiliency for communities affected by a traumatic event
- **MISSION** – Integrate the CRT model into the current ICS in order to provide an effective, coordinated network of professional mental health providers that would minimize the short-term and long-term effects of crises experienced by victims.



- OBJECTIVES – What do we want to accomplish?
 - READINESS: Implement of a set of pre-determined strategies to provide effective, coordinated/organized network of skilled mental health providers to address victim trauma after an event.
 - RESPONSE: Develop and implement a statewide set of plans and procedures for responding to critical incidents that minimizes the short and long-term effects of trauma experienced by victims after an event.
 - RECOVERY: Provide basic crisis interventions to support community resiliency in the aftermath of an event.

VMOSA

- STRATEGIES – How will we get the obj done?
 - Readiness: Build statewide capacity
 - Readiness: Provide information and enhance skills by training and certifying a network of MH professionals with EB crisis response curricula
 - Recovery: Modify OOG policies, procedures and practices change business processes to facilitate and expedite victim organization continuity of services.
 - Recovery: Diversify funding streams in order to serve a broader range of victims
 - Response: Create statewide EB crisis response model that can be implemented on a broader scale if necessary



VMOSA

➤ ACTION PLAN – What's Next?

Establish Authority

1. To define roles and responsibilities
2. To define notification protocols

Planning Meetings

1. Discuss integration
2. Budget
3. Multidisciplinary Partnership Participants

Continue work on procedure

1. As plans are made, ensure that procedure gets updated

Review current practices

1. What do the EM folks do currently?
2. Who else is doing the work?



Team Structure/Composition

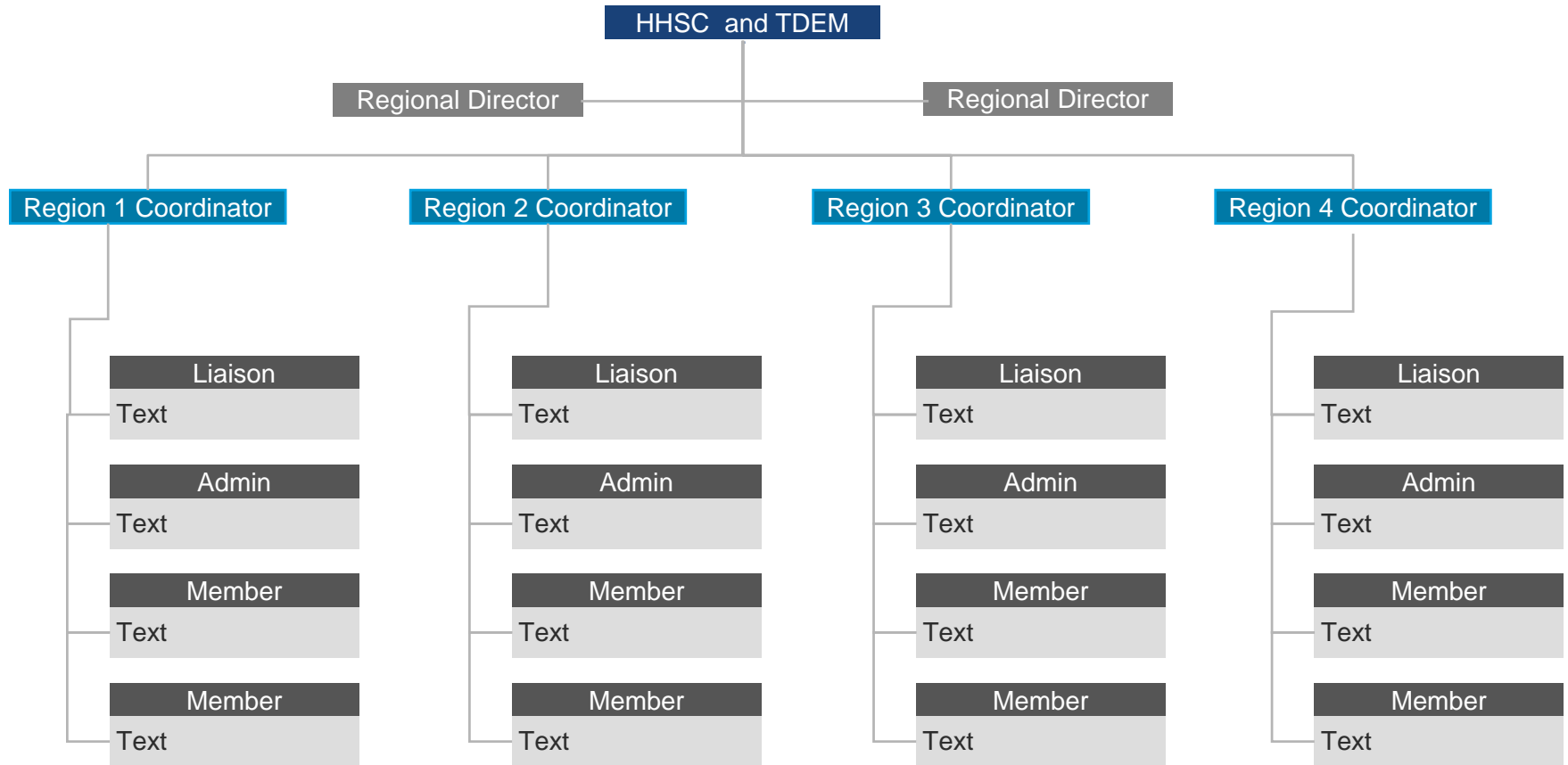


Services Provided

- 24-hour response capacity
- crisis intervention
- psychological first aid
- outreach/education
- individual and community assessment
- strategic planning
- screening and referral
- individual stabilization
- crisis management briefings (think town hall mtgs)
- critical incident stress debriefings
- crisis counseling
- community education
- stress management
- brief supportive counseling
- training
- support groups



Regional CRT Structure x 2



Crisis Response Team (CRT) Leadership

➤ Two (2) Regional Directors

- Each has overall responsibility for operations of four (4) statewide CRT Regions
- Reviews all plans, policies, reports, MOUs, MAAs, contracts, etc., prior to implementation
- During response, will collaborate with the Coordinator to plan the response action



Crisis Response Team (CRT) Leadership cont.

➤ **Eight (8) Regional Coordinators**

- Responsible for the overall planning, policy development, management of their geographical region
- Coordinates with the integral EM & MH partners to assess the need for CRT intervention/participation
- Coordinates and manages team training e.g. drills/exercises, Crisis Certifications, Licensure reqs



Crisis Response Team (CRT) Composition

The distribution of each will be contingent upon the population and assessed by the Regional Director and Coordinator

➤ **Liaison**

- Interfaces with the Incident Commander and other responders e.g. volunteer orgs, community leaders

➤ **Lead Licensed Counselor**

- Coordinate orientation/pre-deployment briefings for DBHRT members; coordinate field triage



Crisis Response Team (CRT) Composition

cont.

➤ **Administrative Assistant**

- Assists with reporting reqs and documentation (e.g. funding, CRT specific IAP)

➤ **Licensed Counselors (assigned based on event impact, skill & need)**

- Provide counseling and supportive services immediately after the event
- Children & Family Support: Stationed in the Family Assistance Center



Proposed Regional Split



- Already established network of “Certified” LMHAs
- Established ICS protocols and experience
- OOG’s level of funding
- TDEM’s SME network

S

Strengths

W

Weaknesses

- Funding stream is not diversified
- Inability to respond to victims of natural disasters
- Current model has exorbitant travel projections
- Current business model is not set up for “crisis” funding

- Utilize VOCA funding to address gaps in crisis service provision
- Diversify funding
- Build a sustainable, evidence based model that can be shared with others

O

Opportunities

T

Threats

- Unallowable expenditures not covered under VOCA
- Duplication of services b/c of “out of network” entities
- Funding instability could mean unsustainable model
- Slow grant processes that impede the recovery efforts & have bad optics





Office of Justice Programs

Requirement to Monitor Subrecipients



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

- [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

- 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.

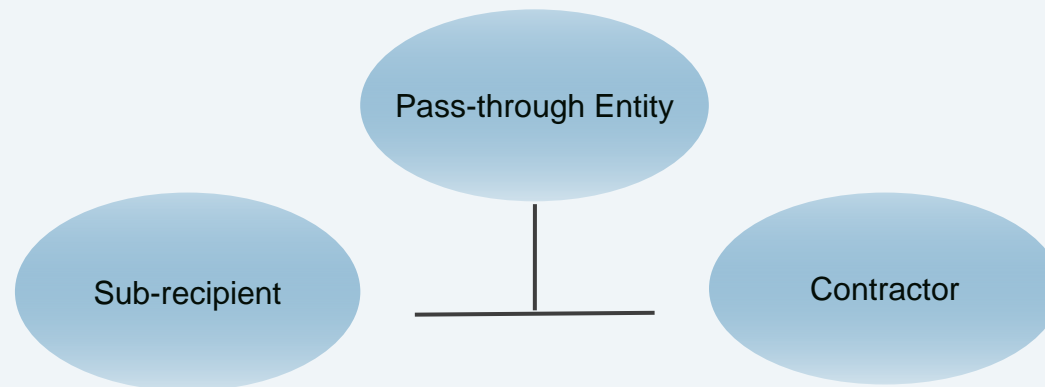
Characteristics of a Subrecipient vs. a Contractor



Subrecipient	Contractor
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

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



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

- 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



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)*.



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.

Subrecipient Risk Factors:	1	2	3
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">• Award amount• Matching funds• New subrecipient,• Budget modification requests	<ul style="list-style-type: none">• Past suspension or debarment• Federal debt owed	<ul style="list-style-type: none">• Delinquent reports• Recent audit opinion• Received financial monitoring visit from federal government



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.

A close-up photograph of a hand holding a black pen with a gold-colored tip, writing on a white document. The document has some faint, illegible text. The background is blurred.

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).

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.



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.*)

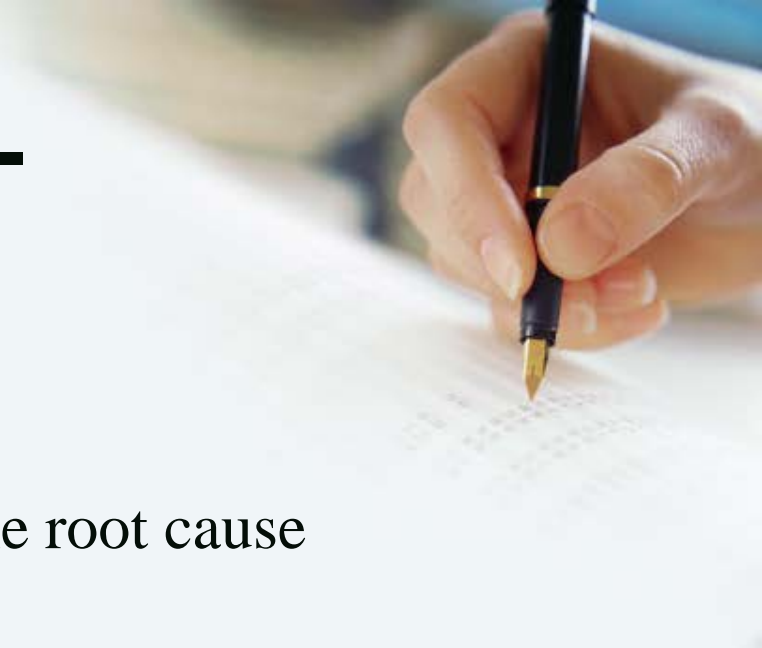
Pass-through entities are not:

- 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

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State Administrator Presentations on Monitoring Practices

LESLIE O'REILLY

VOCA Program Specialist

*Michigan Department of Health and Human Services
Crime Victim Services Commission*

JOHN MAHONEY

VOCA Administrator

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



VA - Monitoring

- ▶ Borrowed many CFR monitoring Items from Michigan.
 - ▶ Imitation is the sincerest form of flattery. 😊
- ▶ Developed:
 - ▶ Monitoring Plan and Policy
 - ▶ Scored Risk Assessment
 - ▶ Subgrantee Template Policies – Resource for Subgrantees to assess/address CFR compliance



Who Does the Monitoring?

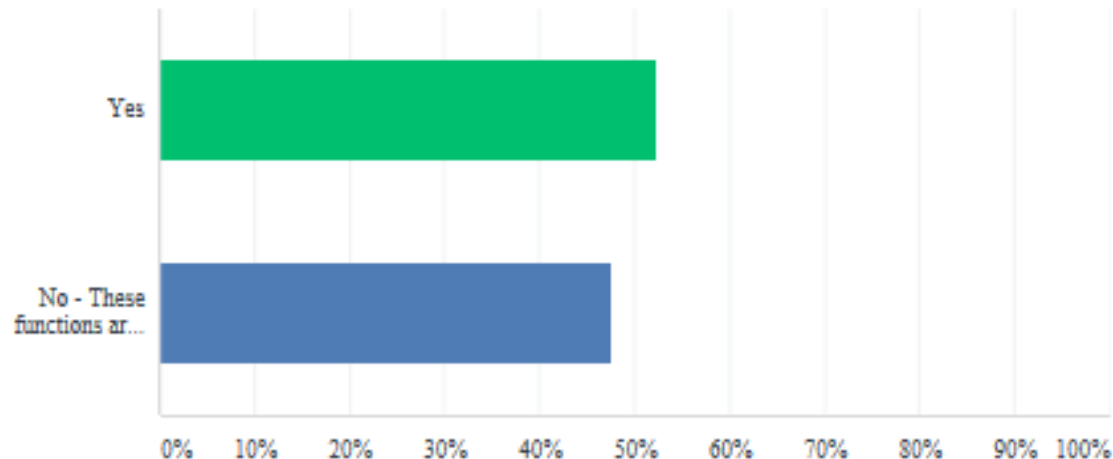
- ▶ Both program and fiscal staff, or just one?
- ▶ **VA** – Both - Grant Monitors review financial compliance issues on-site and bring records and “issues” back for Fiscal Analyst review.
- ▶ **MI** – 2 auditors perform on site review of financial records at high risk agencies and quarterly desk reviews for low and medium risk agencies.
- ▶ Auditors = Department employees; 100% VOCA Admin.
- ▶ Leslie + 4 analysts monitor grantees for grant compliance.



Survey - Who Does the 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

- ▶ **VA** - 5 staff monitor programs. Sixth monitor just started.
- ▶ 462 subgrantees currently, including 316 VOCA subrecipients.
- ▶ On track to monitor 80+ subgrantees in the next year; many with multiple subawards.
- ▶ Monitoring = One of many responsibilities.
- ▶ **MI** – 6 staff involved monitoring.
- ▶ 150 sub-grantees - 30 agencies have multiple agreements.
- ▶ 2 auditors - 20 high risk financial audits annually.
- ▶ Also perform quarterly desk reviews of randomly selected quarterly expenditures for medium and low risk grantees



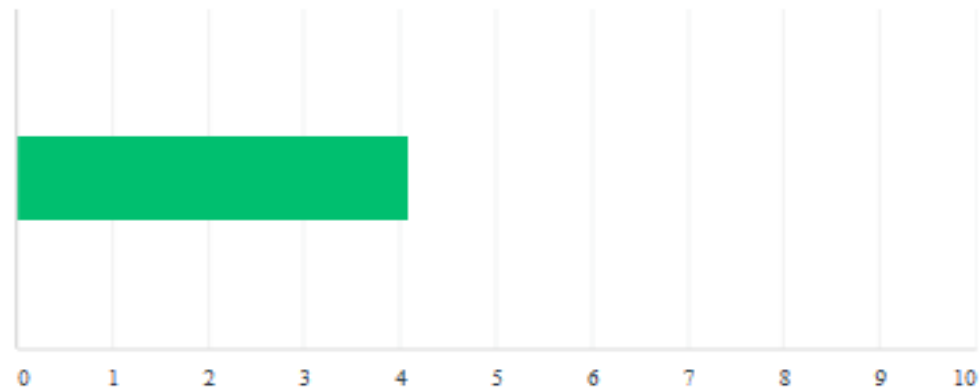
Monitoring

- ▶ **MI** - 4 staff – Compliance monitoring.
- ▶ 1 VOCA Compliance Analyst performs on site reviews
 - ▶ 20 high risk grantees annually; 4 year rotation.
- ▶ 3 VOCA Analysts perform desk reviews.
- ▶ All Division staff involved in application reviews.



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

Answered: 21 Skipped: 2



ANSWER CHOICES	AVERAGE NUMBER	TOTAL NUMBER	RESPONSES
Responses	4	86	21
Total Respondents: 21			



Grant Monitor Training

- ▶ Study VOCA Rule; provide TA
- ▶ Attend/Present Grant Management Training.
- ▶ Shadow more experienced staff.
- ▶ Review DOJ Financial Guide, CFR, award conditions.
- ▶ OVC/NAVAA Trainings



Monitoring/Risk Assessment

- ▶ Monitoring Plan/Tools and Risk Assessment in “continuous improvement.”
- ▶ Risk Assessment – Completed by Applicants and reviewed/amended/verified by Grant Monitors.
- ▶ Excel based – Macro used to compile risk scores from all grantees.



VA Compliance Monitoring Tool

- ▶ Currently – Nine Worksheets.
- ▶ Organized/Sortable by:
 - ▶ Subject – Allowable Costs, Eligibility, Procurement etc.
 - ▶ Method of Data Collection – Desk Audit, On-Site, Self Assessment

7	ALL QUESTIONS (228 items)								
8	Question Related to Grant Requirement or Condition	Y/N/NA	Comments/Description	Requirement Subject	Source of Authority/Requirement	Source Detail	Requirement type	Where/How is Compliance Documented	Address in: Desk Audit/Grantee Review/ On-Site
9	Is the subgrantee aware that it must manage subawards in compliance with The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by the Department of Justice (DOJ) in 2 C.F.R. Part 2800?	Yes		Allowable Costs/Accounting Systems	VOCA SAA Award Condition	https://oip.gov/funding/Explore/SolicitationRequirements/MandatoryTermsConditions	Financial	DCJS Condition/Special Condition	Desk Audit
10	Is the subgrantee aware that it must comply with all applicable requirements to obtain specific advance approval to use a noncompetitive approach in any procurement contract that would exceed the Simplified Acquisition Threshold (currently, \$150,000)?	Yes		Allowable Costs/Accounting Systems	VOCA SAA Award Condition	https://oip.gov/funding/Explore/SolicitationRequirements/MandatoryTermsConditions	Financial	DCJS Condition/Special Condition	Desk Audit
11	Is the subgrantee aware that it must promptly refer to DCJS and the DOJ Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, subrecipient, contractor, subcontractor, or other person has, in connection with funds under this award – (1) submitted a claim that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct?	Yes		Allowable Costs/Accounting Systems	VOCA SAA Award Condition	https://oig.justice.gov/hotline/info.htm	Financial	DCJS Condition/Special Condition	Desk Audit

Survey-SAA Needs to Improve Compliance

	EXTREMELY IMPORTANT	VERY IMPORTANT
Training for SAA's on assessing CFR compliance.	69.57% 16	30.43% 7
Training for SAA staff on assessing subgrantee compliance with VOCA and other PROGRAMMATIC requirements.	65.22% 15	21.74% 5
More SAA staff with auditing or CFR compliance monitoring expertise.	60.87% 14	30.43% 7
More SAA staff to conduct on-site monitoring of subgrantees.	52.17% 12	34.78% 8



Survey- Other Needed Compliance Tools

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%



Risk Assessment

- ▶ MI also uses Fraud Corrective Action Plan.
- ▶ VA Grantees complete 10 items, Inc. SAM verification.

DCJS VOCA Grant Risk Assessment Form

Grantee:

Radford City & Floyd County
Radford City/Floyd County Victim
Witness

Grant Program Name:

Grant #:

18-V9275VW16

Purpose: 2 CFR 200.331 requires that DCJS evaluate each subrecipient's risk of noncompliance with federal statutes, regulations, and the terms and conditions of the subaward. Our goal is to support and assist you in evaluating and your compliance and to efficiently address any risks identified. Your completion of this brief assessment supports that goal.

Instructions: Please provide **Yes, No, or dates** in cells, as appropriate. **Each question requires only ONE response.**

Grantee Responses

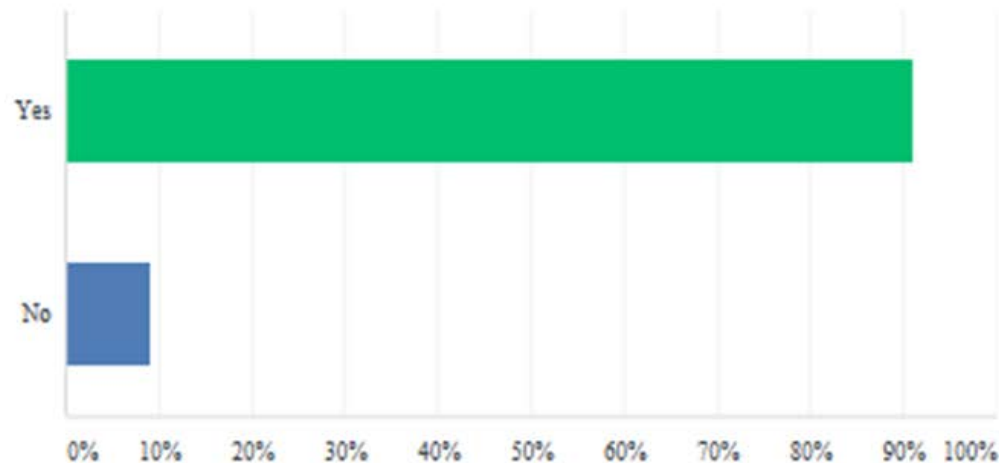
Has your Agency/Locality registered in the Federal System for Award Management (SAM) and ATTACHED a PDF file verifying registration?

YES (see attachment)

Survey- Monitoring Plan, Policy, Risk Assessment

Have you developed a VOCA monitoring plan and policy?

Answered: 22 Skipped: 1

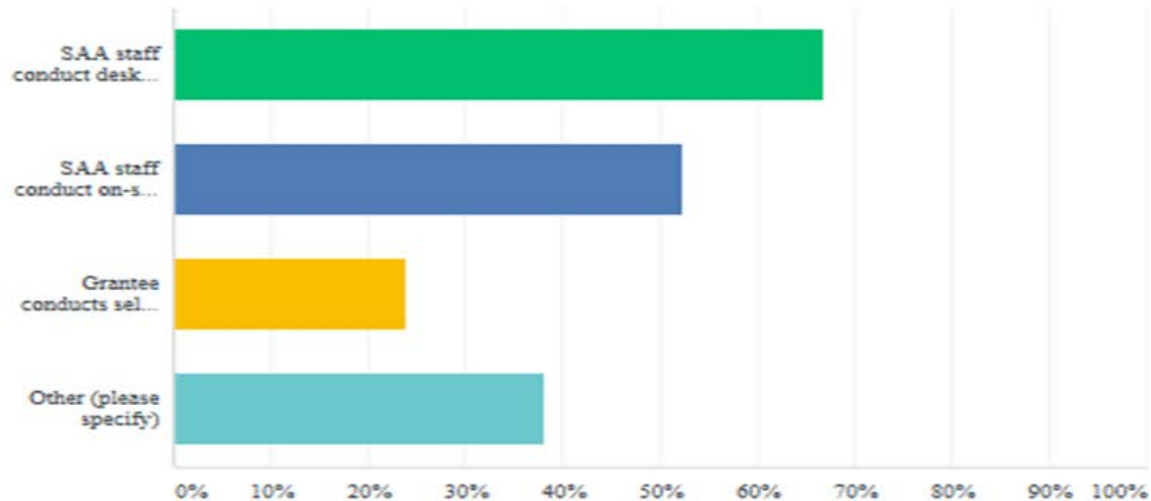


ANSWER CHOICES	-	RESPONSES	-
- Yes		90.91%	20
- No		9.09%	2
TOTAL			22

Survey–Risk Assessment

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

Answered: 21 Skipped: 2

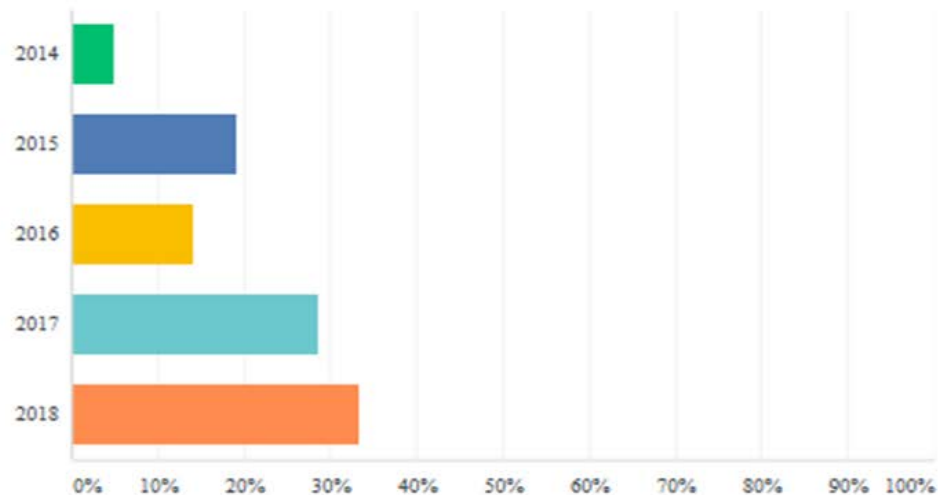


ANSWER CHOICES	-	RESPONSES	-
- SAA staff conduct desk review		66.67%	14
- SAA staff conduct on-site review		52.38%	11
- Grantee conducts self- assessment		23.81%	5
- Other (please specify)	Responses	38.10%	8
Total Respondents: 21			

Survey-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
TOTAL			21

Survey Link

- ▶ Survey Distributed to VOCAVA listserve
- ▶ Seeking input on: funding of New VOCA Projects and Compliance Monitoring efforts.
- ▶ Purpose: Identify positive trends and emerging needs etc.
- ▶ Please take the survey at:
- ▶ <https://www.surveymonkey.com/r/TLL62QG>



Do Stakeholders Assist with Monitoring?

- ▶ **MI** and **VA** – Not currently.
- ▶ **MI** – VAWA projects - Peer Assessors evaluate DV/SA Standards Compliance.
- ▶ **VA** - Professional Standards Committee – SA/DV Standards in development.
- ▶ Peer assessors or other stakeholders MIGHT also assist with monitoring.



Monitoring Common Findings/Themes

- ▶ (Not in order of importance or frequency)
- ▶ Procurement policies lack detail/purchase orders/receipts incomplete
- ▶ Civil rights policy compliance
- ▶ Client surveys lacking
- ▶ Personnel policies incomplete
- ▶ Inventory incomplete



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Guidelines										
CLEAR										

DAC VOCA Financial and Administrative Guide
Federal Grant Program Guidelines



	Application and Award Contract									
	CLEAR									

Application and Award Contract



		Subgrant Award Report								
		CLEAR								





Correspondence
Request for Checks
Important Emails



		Correspondence								
		CLEAR								

			Grant Adjustments							
			CLEAR							

Grant Adjustment
GAN Request
GAN Approval





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				
						CLEAR				





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



							July			
							CLEAR			





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



								August		
								CLEAR		





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										
CLEAR										





Other Budget Category Receipts



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



		January								
		CLEAR								





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



						May				
						CLEAR				





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



							June			
							CLEAR			





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



								July		
								CLEAR		





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



									August	
									CLEAR	





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



Oklahoma District Attorneys Council - Victims Division
VOCA Subrecipient and Grantee Monitoring Risk Assessment Factors

Column D: Total Dollar Amount of Grant Award

Intended to capture the total maximum amount of the grant award. The preparer will establish the thresholds for each option (small, medium, large) based on the amounts of their assigned grant awards.

[illegible]

Column E: Does the Agency have previous grant experience?

Intended to capture a grantee's previous experience with administering programs. Because programs have specific requirements that are unique, a grantee who has not administered these types of programs in the past may be considered to have a higher risk of noncompliance than a grantee who does have experience.

[illegible]

Column F: Has there been financial & compliance monitoring over the Agency during the prior two years?

Grantees subjected to a monitoring or audit by MDHHS or accounting firm (such as a single audit) will typically have a lower risk than those who have not had a review. Based on the type and depth of the review or audit, you will assign the appropriate risk score from one of the three options provided.

[illegible]

Column G: Are you aware of frequent turnover of key staff or other staff at the Agency?

Frequent turnover of staff at the Agency can potentially cause a lack of consistency with how they conduct the program(s) for which they are receiving grantee dollars for. While you may not have a means of knowing this for certain, if you are aware of frequent turnover in staff, you should mark "yes" to this risk factor.

[illegible]

Column H: Are you aware of any other issues that may indicate increased risk of non-compliance?

Through interactions with the grantees you may become aware of issues that increase risk of the agency failing to comply with the terms and conditions of its grant award with MDHHS. If you are aware of any concerns respond with "yes" and retain documentation to support your concerns of potential noncompliance.

[illegible]

Oklahoma District Attorneys Council - Victims Division
VOCA Subrecipient and Grantee Monitoring Risk Assessment Factors

Column I: Are you aware of any financial management problems/financial instability for the Agency?

Examples of financial problems or issues may be risk of insolvency, poor financial management practices, late or incorrect expenditure reports for the grant award, etc. You may become aware of these issues through a financial audit performed by an independent accountant or through MDHHS monitoring activities. You will indicate "yes" to the risk factor if you are aware of any known issues or problems.

[illegible]

Column J: Did the Agency have significant findings or questioned costs related to your program from a prior audit?

Audit findings and questioned costs in the grantee's audit report related to MDHHS funded programs puts the entity at higher risk. You will indicate "yes" if the grantee's audit report has findings and questioned costs related to MDHHS funded grant awards.

Yes	3									
No	0									

Column K: Does the Agency have recurring/unresolved issues (e.g. Internal control/financial management issues)?

Grantees that have known issues, and are unable to rectify those issues in a timely manner, should be considered a higher risk than grantees who are able to correct issues when identified. If you are aware of issues that have been previously identified, but have not been corrected over the course of more than one audit or review cycle, you should answer "Yes" to this risk factor.

Yes	6										
No	0										

Column L: Has the Agency been found to be in programmatic non-compliance?

Grantees who have not complied with MDHHS programmatic requirements in the past should be considered a higher risk. Examples of programmatic issues could be failure to comply with case record requirements, failure to comply with program standards of promptness, determining program eligibility incorrectly, etc.

[illegible][illegible]

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 Programm atic 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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Coun t	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 Deskt 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	Close- Outs	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	EEOP	Communication Method	SAR	Date Significant Findings Were Resolved	Close-Out
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