Crime Victim Services
Compliance Monitoring Training

OFFICE FOR VICTIMS PROGRAMS
Division of Criminal Justice

https://dcj.colorado.gov/dcj-offices/victims-programs/grant-funding-for-agencies/crime-victim-services-funds

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Department of Public Safety

Purpose of compliance monitoring

Both federal and state fiscal rules and regulations require that DCJ establish and carry out activities that will track, document and measure the use of grant funds. The Office for Victims Programs (OVP) will be doing our best to visit and conduct a comprehensive monitoring review of grant-funded agencies at least once every two years.

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Important - Don't freak out!

DCJ's philosophy is to work collaboratively with an agency to identify and correct any problems. OVP staff are here to assist agencies in gaining compliance with state and federal regulations!
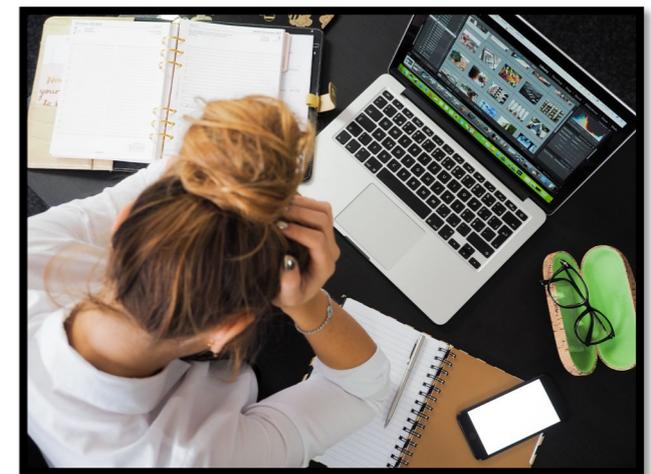
Overview of the monitoring process

The Office for Victims Programs' (OVP) monitoring process involves four (4) distinct phases. The process <u>must be completed in one quarter</u>, and the project director will receive ample notice prior to the beginning of the process.

Phase 1
Review of **financial** backup documentation and reports

Phase 2
Review of **administrative** and programmatic information and reports

Phase 3
On-site review

Phase 4
Issuance of the **monitoring report**

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Phase 1 – Review of the financial backup documentation

- Approximately one month prior to the monitoring review period, the project director is sent a monitoring notice that the agency has been selected for a monitoring review of the current quarter.

- The monitoring review for one quarter is completed in the following quarter. *For example, on September 18, 2023, agencies received an email that OVP will be monitoring their agency for the July to September 2023 time period. The period for the review would begin on October 1, 2023 following the close of Q3, and would have to be completed by December 31, 2023.*


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Phase 1 – Continued

The initial email will list all of the items to be reviewed, and include specific requests for documentation, including copies of:

- Current chart of accounts that shows revenue and expenditure accounts for your federal grant;

- Deposit records and receipt for the most recent federal grant revenue the agency has received (even if that was from the previous quarter);

- Accounting ledger showing the federal grant expenditures as reported on the electronic financial report for the quarter being monitored and on the electronic payment request for the quarter;

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Phase 1 – Continued

- Timesheets for grant-funded staff whose salaries were charged to the federal grant for the quarter being monitored;

- Copies of the labor distribution/payroll distribution for VOCA funded employees and match;

- Source documentation (i.e. signed, approved invoices, mileage vouchers, expense reports marked with the grant name and number as well as the proportion of the approved amount) for any approved supplies and operating and travel expenditures;

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Personnel -Labor Distribution Example

ACME Nonprofit

VOCA Grant #2022-VA-23-xxx-xx
Labor Distribution/Payroll
Pay Period 01/01/23 - 03/31/23

Employee Name	Date	Salary	Fringe Benefits	VOCA %	VOCA Salary Portion	VOCA Fringe Benefits Portion
Doe, Jane	1/15/2023	$ 1,430.00	$ 228.79	30%	$ 429.00	$ 68.64
Doe, Jane	1/31/2023	$ 1,430.00	$ 228.79	30%	$ 429.00	$ 68.64
Doe, Jane	2/15/2023	$ 1,430.00	$ 228.79	30%	$ 429.00	$ 68.64
Doe, Jane	2/28/2023	$ 1,430.00	$ 228.79	30%	$ 429.00	$ 68.64
Doe, Jane	3/15/2023	$ 1,430.00	$ 228.79	30%	$ 429.00	$ 68.64
Doe, Jane	3/31/2023	$ 1,430.00	$ 228.79	30%	$ 429.00	$ 68.64
		$ 8,580.00	$ 1,372.74		2,574.00	$ 411.82

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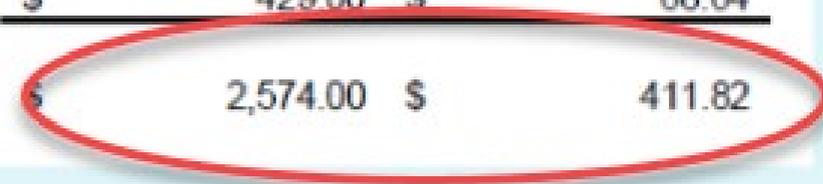
Phase 1 – Continued

- A list of current staff members funded under the federal grant, including those staff members designated as match for the federal grant, highlighting any revisions to staff, hours worked, salaries, etc. that have changed since the original grant agreement (*refer to your original grant agreement*). ***This information must be included in the monitoring packet even if you have notified your grant manager of any changes, or made revisions in zoom grants.*** (*A staff change form will be provided as part of the initial monitoring packet.*)

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Change in staff/positions form

Grant Funded Staff Change Form

Agency: _____   Submission Date: _____
Grant Number: _____

Original Grant Agreement - from the Budget Page/ Most Recent Budget as of:

Position# as in Original Budget	Position-Title (list all)	Staff name in original/ recent ammendment	Monthly Salary	Salary for two years	Salary % covered by grant	Amount of Salary Paid by Grant	Fringe for two years	Fringe % covered by grant	Amount of Fringe paid by Grant	Hours/FTE	Total Covered by the Grant	End Date
1												
2												
3												
4												
5												
6												
7												
8												
9												
10												
						$0.00			$0.00		$0.00	

Spent as of today	
Remaining Personnel Budget	$0.00

Current Staff - List all staff funded by grant

Position# as in Original Budget	Position-Title (list all)	Current Staff	Monthly Salary	Salary - for remaining months	Salary % covered by grant	Amount of Salary Paid by Grant	Fringe- for remaining	Fringe % covered by grant	Amount of Fringe paid by Grant	Hours/FTE	Total Covered by the Grant	Start Date
1												
2												
3												
4												
5												
6												
7												
8												
9												
10												
						$0.00			$0.00		$0.00	

Important note: this form does NOT take the place of obtaining prior approval from your grant manager and completing the proper budget modification forms!
The total of your overall grant should also remain unchanged

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Phase 1 – Continued

- As part of the initial packet, agencies will also receive a technical assistance document developed by OVP entitled "Essential Grant Accounting and Financial Documentation (with representational samples)".

- This document should assist agencies with common grant-related financial questions.

Essential Financial Guide

OFFICE FOR VICTIMS PROGRAMS

OVP

ESSENTIAL GRANT

ACCOUNTING

AND

FINANCIAL

DOCUMENTATION

(WITH REPRESENTATIONAL SAMPLES)

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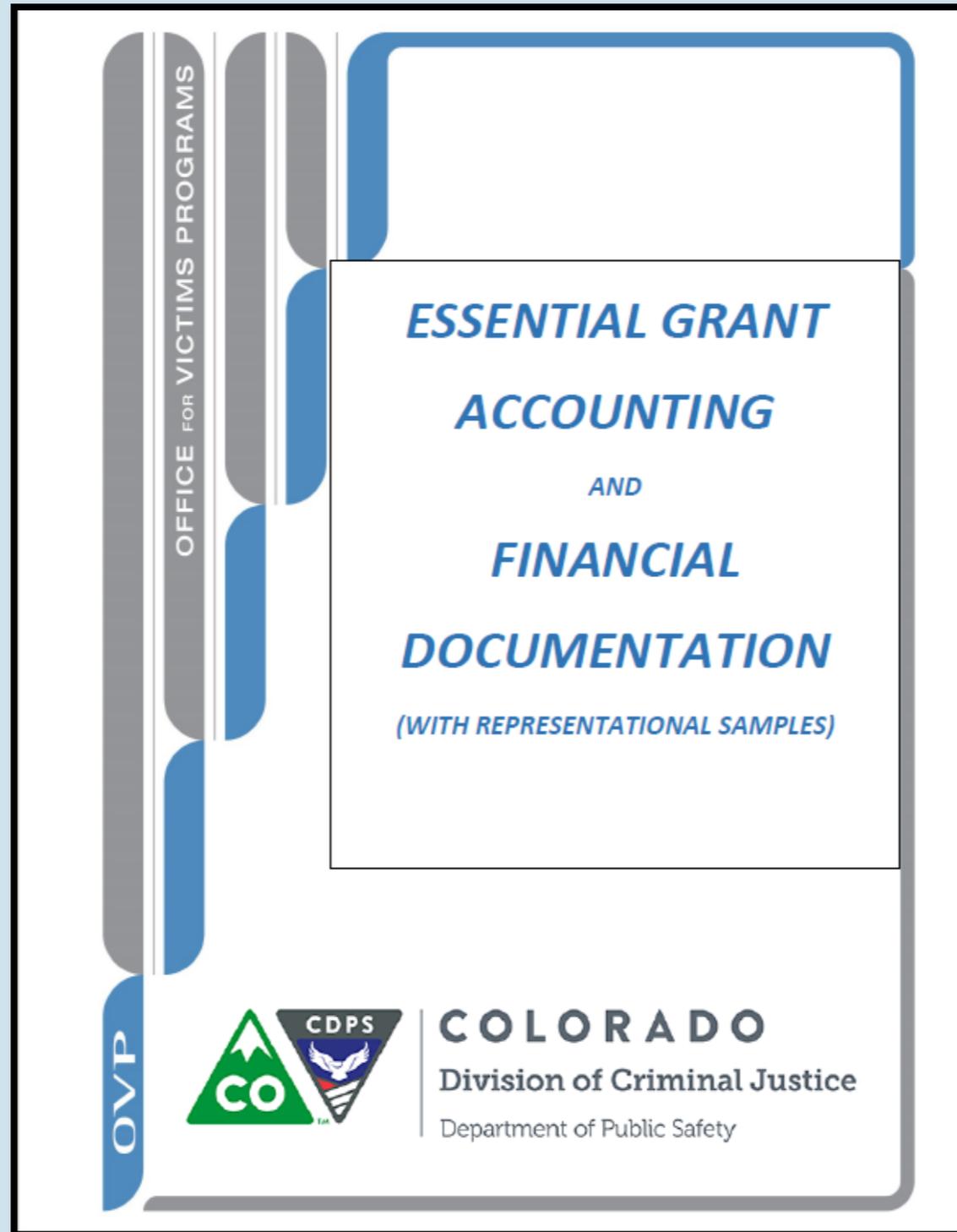
Phase 1 - Continued

- OVP will work with the project agency to assure all of the proper documentation is in place.

- **Important Note** - Agencies being monitored by OVP <u>will not</u> have their quarterly financial requests for payment processed until Phase 1 of the monitoring review is complete and OVP can be assured the financial requirements are being met by the agency being monitored. *(The sooner the agency being monitored completes the financial requirements, the sooner they will have their financial request processed for the quarter being monitored!)*

- Once the financial phase is complete, OVP will send the agency an email which includes the requirements for the administrative portion of the review (Phase 2).

Important side note!!!
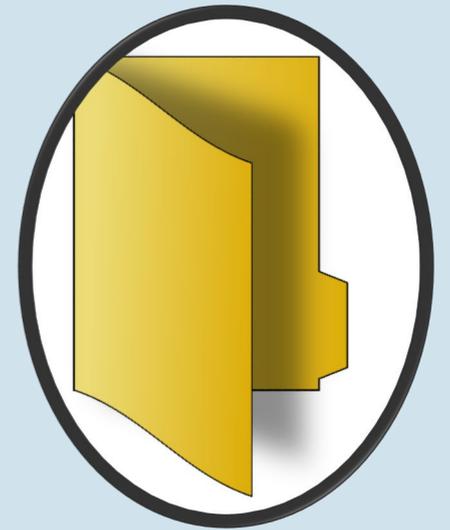
- OVP has moved to a paperless system for monitoring!

- Please provide all documentation as **separate** **pdf** (or word) documents labelled appropriately (i.e. – Employee Handbook, LEP Policy, bylaws, etc.)

Do NOT send all of the requested documents in a single pdf!

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Phase 2 – Review of administrative and programmatic information

Phase 2 requirements include:

- A copy of your written procedures regarding how you ensure client confidentiality when appropriate, and protection of personally identifying information; how and what type of client data you collect; and how and what type of evaluation of your services is obtained;

- Copies of 4 or 5 recently-completed evaluations of your services. Please redact any personal identifying information;

- Agencies are required to have a written "whistleblower policy" in place;

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Phase 2 – Continued

- Confirmation that federal grant records retention language has been incorporated into your procedures;

- A copy of your agency's personnel policies and procedures that include the required elements (including the lobbying/political activity prohibition while being paid with federal grant money);

- A copy of your agency's financial policies and procedures, including the required elements (internal controls, travel policy, etc.);

- If available, a copy of your agency's policy on 'Determination of Suitability for Covered Individuals Who May Interact with Participating Minors'. Detailed information on this federal condition can be found at: https://dcj.colorado.gov/background-check-faqs-for-cvs-grantees – Only for VOCA/VAWA/SASP

- Confirmation that you have a procedure in place for responding to *Limited English Proficiency* (LEP) individuals who may contact your organization seeking information or assistance;

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Phase 2 – Continued

- Confirmation that you have posted the federal Office for Civil Rights and the Colorado DORA brochures that explain the non-discrimination policy and the complaint procedure for individuals who feel their rights have been violated;

- A copy of your board of directors' signed bylaws (non-profit agencies only);

- A signed copy of the plain-language "guide to specific contractual elements on the monitoring checklist" document; and

- Confirmation that your agency has submitted a certification form to the federal Office for Civil Rights (https://ojp.gov/about/ocr/eeop.htm) certifying **compliance with or exemption from** the EEOP requirements.

*Important Note!: This is **not** the same form as the Form 30 provided with the grant application or agency EEOP plan*

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Sample EEOP certification form

CERTIFICATION FORM

**Compliance with the Equal Employment Opportunity Plan (Equal Employment Opportunity Program) Requirements**

Recipient's Name:	██████████████████████		
Address:	████████████████		
Recipient Type:	Subrecipient	Law Enforcement Agency:	Yes
DUNS Number:	████████	Vendor Number (only if direct recipient):	
Name of Contact Person:	███████	Title of Contact Person:	Victim Services Coordinator
Telephone Number:	████████	E-Mail Address:	██████████████
Subrecipients:	No		

Acknowledgement of EEOP Data Collection, Maintenance and Submission Requirements

I, ████████████████████████████ **Program** (*recipient organization*) has an obligation to develop and submit an EEOP Utilization Report to the Office for Civil Rights, Office of Justice Programs, U.S. Department of Justice (OCR) for **2018** (*fiscal year*). I understand the regulatory obligations under 28 C.F.R. Section 42.301-.308 to collect and maintain extensive employment data by race, national origin, and sex, even though our organization may not use all of this data in completing the EEOP Utilization Report.

By accepting financial assistance subject to the civil rights provisions of the Safe Streets Act, ████████ ████████████████████████m (*organization*) is on notice that at some future date, during the active award period, the OCR may request any of the employment data noted in the EEOP regulations. I understand that in the context of an administrative investigation of an employment discrimination complaint, failure to produce employment data required for a comprehensive EEOP may allow the OCR to draw an adverse inference based on the data's absence.

████████, Victim Services Coordinator ██████████   6/25/2018

Print or Type Name and Title   Signature   Date

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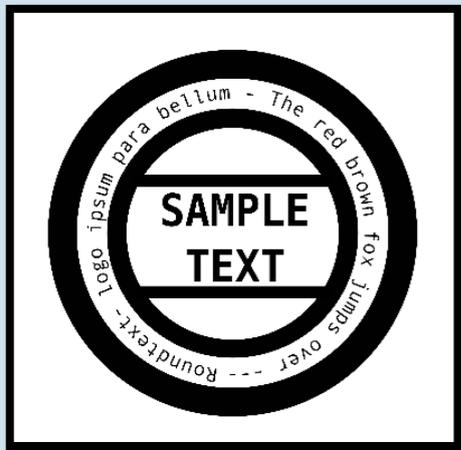
Phase 2 – Continued

- During this phase, OVP may provide agencies with sample documents as a resource when creating and updating agency policies and procedures.

- Following the completion of Phase 1 and Phase 2, OVP will contact the agency to arrange an onsite visit (Phase 3).

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Phase 3 – On-site Visit Review
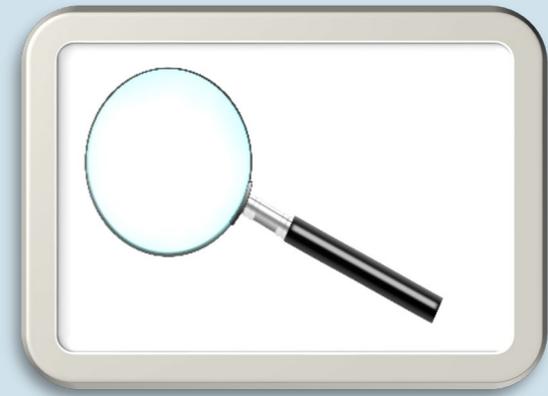
The Grants Compliance Monitor will contact your agency well in advance of any on-site review. As part of the on-site visit, OVP will:

- Ask to meet with the project director and grant funded staff (*if available*).

- Review your federal grant file which should contain a signed copy of the grant agreement (contract), correspondence, and any related documents.

- Ask your agency to show where confidential client files are stored (if any).

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Phase 3 – Continued
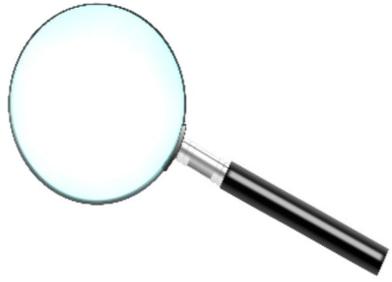
- Ask how your agency generates the data that is reported on the PMT Report (VOCA), Muskie Report (VAWA), or Data Report (ARPA/General Fund) including verifying the most recent total number of victims reported.

- Confirm that the federal administrative guide is on hand or *readily available:* https://cdpsdocs.state.co.us/dcj/grants/federal_adminguide.pdf

- Confirm all employees are authorized to work in the United States (review I-9's/E-Verify)

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Phase 3 - Continued

- Assess if your agency meets the requirement in determining suitability for interaction with minors (employees, consultants, and volunteers). More detailed information and a checklist for determination is available at https://dcj.colorado.gov/background-check-faqs-for-cvs-grantees

- Ask if you have any questions about your grant, and will refer those questions to your federal grant manager.

NOTE: This meeting is *intended* to be informal and can usually be completed in approximately one hour.

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Phase 4 – Monitoring Report

- Most, if not all, of the issues identified during the monitoring review should be addressed <u>prior</u> to the issuance of the final monitoring report. Issues identified in the monitoring review and any outstanding concerns will be noted in the Final Report.

- The monitoring report is typically issued within one week following the on-site visit.

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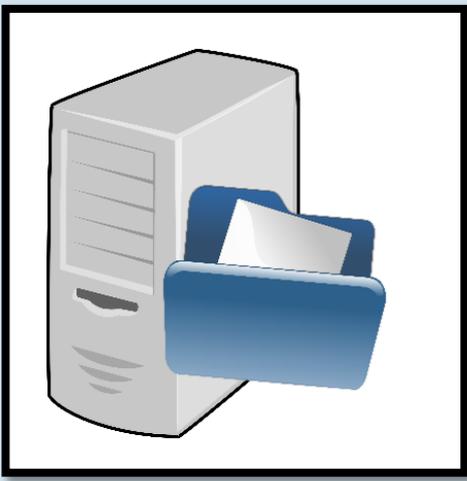
IMPORTANT INFORMATION

- Anticipate that your agency will be monitored every two years. **It is important to keep all of the documents related to the monitoring review in an accessible file**.

- Important! – Any issues identified and corrected during the monitoring process should become part of the standard practice of the agency!

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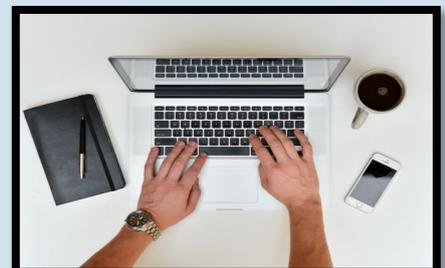
Questions?

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