

2023-2024 Monitoring Webinar

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SPEAKERS

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Hello, my name is Tony Tilger. I am one of two grant compliance monitors at the Division of Criminal Justice Office for Victims programs. This brief presentation is to assist programs that are going to be going through the monitoring review, so that the agency can be prepared and that there's no surprises. I would also note that there is a similar corollary to our review for new agency directors or new financial directors. So one of the things that is important is, there are state and federal fiscal rules regulations that the Office for Victims programs look at to make sure that any agency that receives our state and federal funding would be successful, should there ever be an audit from a state auditor or the Office of Inspector General or any other federal auditors. Our unit, the Office for Victims programs, tries to monitor every agency within a two year grant period.

One of the most important things is once you get the notice that your agency is going to be monitored as just not to freak out. This is not a gotcha review. If there are any identified issues, the Office for Victims programs (OVP) will assist your agency with technical assistance samples, things that other agencies are doing with the true intention of trying to get your agency into compliance with the state and federal regulations. So the monitoring review can be divided up into four distinct phases. The entire monitoring review should be completed in one quarter or three months. As both monitors, the mall and myself, monitor about 15 agencies per quarter. So in other words, about 30 programs per quarter. Having agencies that do not complete everything by the end of the quarter, can really make things difficult for other agencies as we are trying to wrap up a prior quarter while simultaneously starting the review for new agencies that are being monitored. So all that to say please work with the OVP team to complete everything in the three months of the monitoring review.

Phase one. So about one month prior to the monitoring review, you will be getting a notice that for the next quarter, you your agency will be under a monitoring review. So the bad news is that phase one is probably the most difficult and time consuming. But the good news is that the things that the Office for Victims programs will be asking for, should be readily available if the agency is gathering the backup documentation as outlined in the grant agreement and the administrative guide. So the Office for Victims program, we'll be asking for a bunch of different things in the in phase one, including a copy of your Chart of Accounts showing the revenue and grant expenditures from your federal or state grant. Deposit records and receipts for the most recent federal grant revenue, even if

it was a previous quarter, the accounting live ledger showing the federal grant expenditures that is reported in the financial report under the under the specific categories that it should be under timesheets that for grant funded staff whose salaries were being charged to the federal grant and just a quick side note is that the Office for inspector general when they come out to do their federal reviews have been very laser focused on timesheets. So when the office or victims program is a little nitpicky on the requirements for federal timesheets is that we are trying to get all the agencies in compliance, so that there will not be a problem should the agency ever be under a federal review. One of the other things is the labor and distribution. Examples that every group should have. And again, this is something that can be a sticking point for some of the agencies as they go through the Phase One monitoring the source documentation should have on the invoices, they should be great have the grant number. And if there's a portion that should also be on the the invoice as well, so that it's real easy for the rent monitoring team to look to see exactly what the agency has paid for on that particular invoice. So we have created a personnel lab labor distribution example that should really assist agencies. So if you've got Jane Doe, you know what her salary is, you know what her fringe benefit is from the contract, it's 30%, it's really easy to show exactly the personnel dollars, salary and benefits for the first quarter for Jane Doe. That's something that is pretty simple to do, hopefully, for all the employees. So one of the other things that sometimes can be difficult for agencies when there's so much staff turnover.

And we have created. The Office for Victims Program has created a timesheet or a spreadsheet that can assist agencies when determining the correct amounts to allocate to each position. And this the spreadsheet, which is right here also will help in determining at what point you need to be contacting your grants, finance your grant manager to see if you might be need to request a you know, budget revision or something like that. So this is that new form. One of the other things that is part of the initial packet is the essential grant and accounting and financial documentation. The Office for Victims program has created this as it has a a lot of test technical assistance samples, specifically for the financial portion of the review. This document is you'll see this is actually sent as part of the initial packet to all agencies. We will work with the agency to make sure all of the proper documentation is in place. And here's probably one of the most important things. Again, the monitoring team is monitoring about 15 programs every quarter. And it is important that your agency turn things in on time. Because if you turn them in late, it kind of creates a big, you know a lot of work specifically depending on the the the other agencies that are turning things at the same time. So the grant managers typically prioritize nonprofit agencies as they don't have the dollars that can cover expenses for a longer period of time, which might be the case for governmental agencies. However, if the if an agency has documentation that's either incomplete or not organized, it still might take longer for the Phase One review. And as noted in red, the cash requests will not be processed for the the agent for the period that is being monitored until the grant monitor says it's okay to make those payments.

So after that, the phase one is complete, then the agency will move on to phase two. And again what is important to note is that OVP has moved to Our paperless system. So please provide everything as separate PDFs labeled appropriately. Here's our employee handbook, here's our LEP policy, etc. And do not send everything in one big PDF. So we're as we're going through Phase Two, the requirements are going to be there administrative related to a lot of policies and procedures. And the nice thing about the phase two requirements is the Office for Victims programs has sampled for almost every item that it's going to require. So if you need a confidentiality policy OVP as a sample, if you need an LEP policy, limited English proficiency, oh, we OVP has a policy. If you need a whistleblower policy, the Office for Victims programs as a sample, and we we've done all these, the set, they're mostly in a

Word document. So it's really easy for your agency to make those samples your own. We will also ask for four or five recently completed evaluations, please redact any personally identifying information will ask if you have a whistleblower policy, if you have a Grants record retention policy, that shows that you're keeping the documentation for the required period of time, that you have policies related to the prohibition on lobbying and political activity to make sure you have final financial policies and procedures. And one of the newer ones is a policy on determination of suitability for covered individuals who may interact with participating miners. So while this condition is pretty new, the Office for Victims program has created a lot of technical assistance materials, including a flowchart to even see if the special condition is applicable to your agency. And all that is on our website. It's the link that's on the screen here. And it's certainly worth some time, looking at the technical assistance that was set up by OVP for this special condition.

And, you know, we will make sure that you have a Limited English Proficiency policy in place and confirmation that you've posted the Federal Office for Civil Rights Colorado brochures that explain the non-discrimination policy, and the complaint procedure. A lot of agencies will say, Oh, we placed them in the employee break room. Well, that actually, as these policies are for individuals who are being served as well, so in other words, victims. They really should be posted in a place where that is accessible to the public, and not just employees.

We will ask for a copy of your signed bylaws. In other words, executed bylaws, if that's applicable. We will ask for the that you've signed the plain language guide to specific contractual elements. We will ask that you give us the certification that your agency has at least complied with or have an exemption to the ELP requirements. This used to be this special condition has been around for a while it used to be caused a lot of consternation, but I think most agencies are now used to that. So it shouldn't be much of a problem. It's not the same as the Form 30. And quite frankly, should look something like this.

Also part of a phase two, again, we have sample documents. So just make sure that you you use those and request them from us and I think that will really assist in your Phase Two process. Once phase two is done, we will move on to phase three, which is the on site review. The onsite review is actually a chance for the Office for Victims program staff to meet individuals in your agency that are doing the work in the providing In the services to victim, so some of the things that we will do is meet with the staff if they're available. Review your federal grant file to make sure you have a signed copy of the contract. And you have other correspondents and things like that. If your agency creates paper files, we'll make sure that they're kept confidentially if they're stored somewhere. We will ask how your agency generates the data for the PMT report or some of the other reports. And we will confirm that the administrative guide is on hand or readily available. We will also confirm that all employees are authorized to work in the United States. So we'll either be doing an I-9 review or an e-verify review, whatever your agency uses for that condition.

So we will assess if your agency meets the requirements for determining suitability for interaction with minors. Again, as I mentioned before, this is relatively new, but there is a lot of information on our website. And we will finally we'll ask if you have any questions about your grant, and we can refer those questions back to your federal grant manager. Again, this is intended to be very informal, the on site visit is and can be completed in approximately one hour, if or even less. So the final phase

four is the issuing the monitoring report. And the good thing is that most if not all of the issues identified should be addressed prior to issuing that report. If there are things that are outstanding, they likewise will be mission issued in the report and giving a timeframe for completion. And the monitoring report is typically issued within one week of the on site visit. So as a side note is your your agencies should be monitored every two years. So it's really important that you take all the documents, put them in a file so that you'll have them for two years down the road. Also important is anything identified issues during the monitoring process should be part of the standard practice of the agency moving forward. So for example, if during the monitoring process timesheets, the monitoring team said timesheets need to have X, Y, and Z moving forward, then the agency should do that right away and continue to do that not just every two years when the OVP team comes out to monitor.

Finally, I've given you my contact information and the Bimal's contact information if you have any questions, and I hope this presentation has been helpful.