RECOMMENDED FINANCIAL AND ADMINISTRATIVE

"BEST PRACTICES"

FOR

AGENCIES EXPENDING CVS GRANT FUNDS FOR FINANCIAL ASSISTANCE FOR VICTIMS



PROGRAMS

FOR VICTIMS

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OFFIC

COLORADO Division of Criminal Justice

Department of Public Safety

RECOMMENDED FINANCIAL AND ADMINISTRATIVE "BEST PRACTICES" FOR AGENCIES EXPENDING CVS GRANT FUNDS FOR FINANCIAL ASSISTANCE FOR VICTIMS

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Additional Financial Assistance for Victims Examples/Samplesⁱ

Guiding Principles

While ability to provide crime victims with financial assistance for emergency, housing and civil legal needs is an important resource, it is critical to remember that these types of expenditures require detailed accounting in order to document grant funds are being expended appropriately. Despite the best intentions, *grantees must consider how each transaction would be perceived by an outside federal auditor.* Protect your agency's ability to continue to receive and utilize these funds by implementing the following:

- Maintain written procedures that detail how requests for expenditures are screened for eligibility and appropriateness; how the proposed expenditures are authorized; how payment is approved and processed; and how additional considerations such as confidentiality and case management are handled.
- Utilize internal forms that note expenditures have been determined to be eligible, reasonable, and *justified as related to the victimization*; are backed-up by proper source documentation attached to the form; are authorized by the appropriate individual and processed appropriately; and have been entered in the agency's accounting system.
- Thoroughly document each transaction, including taking extra steps as needed to provide clarification in the documentation and accounting system so that it is readily apparent that each transaction is appropriate.

<u>Required Grant Accounting Elements & Items:</u> <u>Providing Financial Assistance for Victims</u>

In addition to the regular grant accounting elements required of all CVS grant recipientsⁱⁱ, grant recipients administering CVS funds for financial assistance for victims must be able to demonstrate the following:

- grant expenditures have been authorized and signed by the correct person;
- invoices are notated with the grant name and appropriate approval;
- invoices indicate appropriate proportion of grant funds to the staff time or other expense, as applicable;
- all expenditures are in the proportions as outlined in the approved budget and reconcile to accounting records;
- the agency has written financial policies and procedures that outline the process
 of administering financial assistance for victims that addresses the protection of
 Personally Identifying Information (PII) and the confidentiality of victims; the
 process for approval of these types of expenditures; and the internal process for
 ensuring the retention of the required financial supporting documentation,
 including:
 - Source documentation for any approved supplies and operating and travel expenditures *for each individual grant* (i.e. signed, *approved and coded* invoices, itemized receipts);
 - Source documentation for any approved Consultants/Contracts (i.e. Statement of Work, signed and dated contracts, signed and *approved and coded* invoices for work completed, signed and approved DCJ Form 16's and/or 17's).

Protection of Personally Identifiable Information

Personally Identifiable Information (PII) is generally defined as any information that permits the identity of a victim to be directly or indirectly inferred. *Direct Identification* includes any information that is unique to the victim such as name, address, social security number, telephone number, email address, etc. *Indirect Identification* would be data elements that, <u>in</u> <u>combination</u>, could identify the victim. This includes combination of race, birth date, geographic indicator, number and ages of children, etc.

Personally Identifiable Information of victims receiving services supported by federal grant funds *must be protected*. For purposes of reporting to OVP on the use of grant funds for financial assistance, the following are recommended practices to avoid breaches of this requirement:

- 1. ENCODE or REDACT victim's name on all reports and supporting documentation;
- 2. REDACT victim's address, social security number, telephone number, email address, etc. on reports and supporting documentation;
- 3. REDACT names and ages of children that may appear in reports and supporting documentation;
- 4. Review the documentation you are about to submit to OVP and REDACT or REMOVE data elements such as race, birth date, geographic indicator, number and ages of children, that, <u>in combination</u>, could reasonably be thought to identify a victim.

(Suggestion: The Adobe Pro redaction function is quick, simple, and effective.)

Eligible Type of Assistance	Documentation Required *Personally Identifiable Information On Victims Must Be Protected	Not Allowed
Childcare (for purposes of obtaining or retaining employment, participating in services related to victimization, or participating in criminal justice proceedings related to the crime)	 Itemized receipt for expense <i>licensed</i> childcare vendor (license number is often found on invoice/ receipt) Authorization for expenditure by supervising staff member with approval signature and notation regarding charging the expense to the grant 	 Direct payment to victims Cost of unauthorized items Payment without itemized receipt Payment to someone other than a licensed vendor Payment for childcare expenses not needed as a result of/or not tied to the victimization
Hygiene and Basic Needs (e.g. food, clothing, basic toiletries, feminine hygiene products, diapers/wipes)	 Itemized receipt Authorization for expenditure by supervising staff member with approval signature and notation regarding charging the expense to the grant 	 Direct payment to victims Gift cards Cost of unauthorized items Payment without itemized receipt Payment for items that are not needed as a result of the victimization
Local Transportation (for purposes of obtaining or retaining employment, participating in services related to victimization, or participating in criminal justice proceedings related to the crime)	 Itemized receipt Authorization for expenditure by supervising staff member with approval signature and notation regarding charging the expense to the grant 	 Direct payment to victims Gift cards Cost of unauthorized items Payment without itemized receipt Payment to someone other than vendor Payment for transportation expenses not needed as a result of/or not tied to the victimization
Moving expenses (e.g. truck rental, movers, short-term storage)	 Itemized receipt from vendor Authorization for expenditure by supervising staff member with approval signature and notation regarding charging the expense to the grant 	 Direct payment to victims Gift cards Cost of unauthorized items Payment without itemized receipt Payment to someone other than vendor

Supporting Documentation for Expenditures for Financial Assistance for Victims

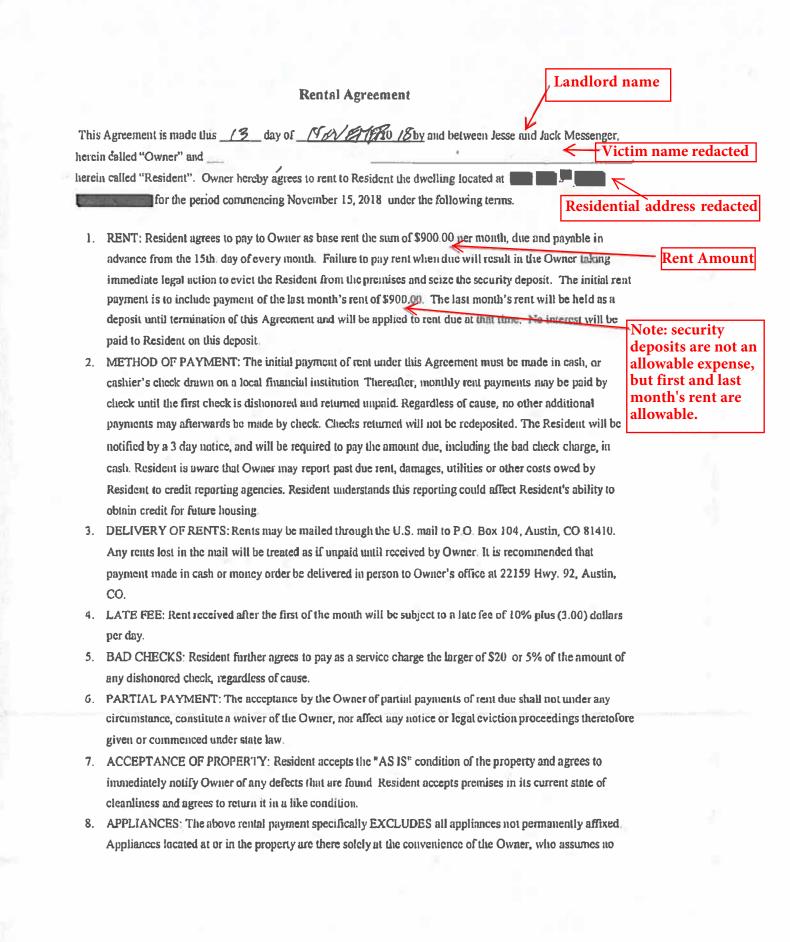
Relocation (e.g. bus, airline, train)	 Itemized receipt Authorization for expenditure by supervising staff member with approval signature and notation regarding charging the expense to the grant 	 Payment for moving expenses not needed as a result of/or not tied to the victimization Direct payment to victims Gift cards Cost of unauthorized items Payment without itemized receipt Payment to someone other than vendor Payment for expenses not needed as a result of/or not tied to the victimization
Rental Assistance (e.g. house, apartment, mobile home, campground)	 Verified 1st and last pages of signed lease (pages on which the parties are named (victim PII is redacted), terms of the lease and rental amount are specified, and signatures appear) Authorization for expenditure by supervising staff member with approval signature and notation regarding charging the expense to the grant 	 Direct payment to victims Deposits Back rent prior to the crime Mortgage payments Credit-risk surcharges Checks made out to individuals or entities other than vendor named on lease Payment for rent not needed as a result of/or not tied to the victimization
Utilities (e.g. electric, gas, water, sewer, trash pickup)	 Start-up and current If <i>included</i> in the lease – note attached to lease itemizing the monthly utility expenses If <i>not</i> included in the lease – Itemized bill in victim's name (name redacted) Authorization for expenditure by supervising staff member with approval signature and notation regarding charging the expense to the grant 	 Direct payment to victims Payment without itemized receipt Payment to someone other than vendor "Catch-up" payments on unpaid bills prior to the crime Cell phones or cell phone minutes Payment for utilities not needed as a result of/or not tied to the victimization
Contracted Civil Legal Representation (eligible services <u>include:</u> • Temporary & permanent protection orders and related activities associated	 <u>DCJ Form 16</u> and <u>DCJ Form 17</u> submitted with signed contract for pre-approval by Grant Program Manager Invoice from attorney Authorization for expenditure by supervising staff member with 	 Direct payment to victims Payment without itemized invoice Payment to someone other than vendor

with safety concerns of	approval signature and notation	• Payment for legal services that
,		
the victim and victim's	regarding charging the expense to	are not needed as a result of
children	the grant	the victimization
 Immigration assistance 	 Checks made out to 	
related to the crime	individual/vendor named on	
(i.e. U-Visa, VAWA	contract	
Petition)	(*Agency should also retain a copy	
 Title IX services (e.g. 	of the attorney's license to practice	
civil legal	law in Colorado, malpractice	
representation of	insurance, and W-9 in their internal	
sexual assault victims in	hard file, but should not submit	
educational settings)	these materials to OVP.)	

ⁱ OVP does not expect or require agencies to use the exact forms or templates provided in this packet. All examples and samples provided are for **informational purposes only** and are being used with the permission of the issuing agency. Agencies should ensure that the required elements described and shown throughout this packet are present in their current practices, if applicable. Additional examples/samples are all located online: https://www.colorado.gov/pacific/dcj/cvs-funds under *Resources for CVS Grantees and Applicants*.

ⁱⁱ Complete lists of Required Grant Accounting Elements and Required Grant Accounting Items are outlined in the Office for Victims Programs <u>Essential Grant Accounting and Financial Documentation Packet</u>.

RENTAL ASSISTANCE EXAMPLE



- 27. RENEWAL TERM: At the end of the initial term of this Agreement, Owner may elect to renew for another term but at a rental increase depending on the market index.
- 28. OWNER'S STATEMENTS: All rights given to Owner by this Agreement shall be cumulative in addition to any other laws which might exist or come into being. Any exercise or failure to exercise, by Owner bf any right shall not act as a waiver of any other rights. No statement or promise of Owner or his agent as to tenancy, repairs, alternations, or other terms and conditions shall be binding unless specified in writing and specifically endorsed.
- 29. COURT COSTS: Resident agrees to pay all court costs and Attorney's fees incurred by Owner in enforcing legal action or any of Owner's other rights under this Agreement or any state law. In the event any portion of this Agreement shall be found to be unsupportable under the law, the remaining provisions shall continue to be valid and subject to enforcement in the courts without exception.
- 30. ACKNOWLEDGMENT: In this Agreement the singular number where used will also include the plural, the Masculine gender will include the Feminine, the term Owner will include Landlord, Lesser, and the term Resident will include Tenant, Lessee. The below-signed parties acknowledge that they have read and understand all of the provisions of this Agreement. This contract is bound by all heirs, executors, successors and/or assigns.

LEGAL CONTRACT: This is a legally binding contract. If you do not understand any part of this contract, seek competent legal advice before signing.

ACCEPTED THIS 13 Elday of Hay 1 port 1 525- 12

——— Victim signature redacted

Resident

Owner Jesse J. Messenger and Owner's Agen

Landlord signature

Note: Copy of entire lease is not necessary. Usually the first and last page will contain necessary information. Required information:

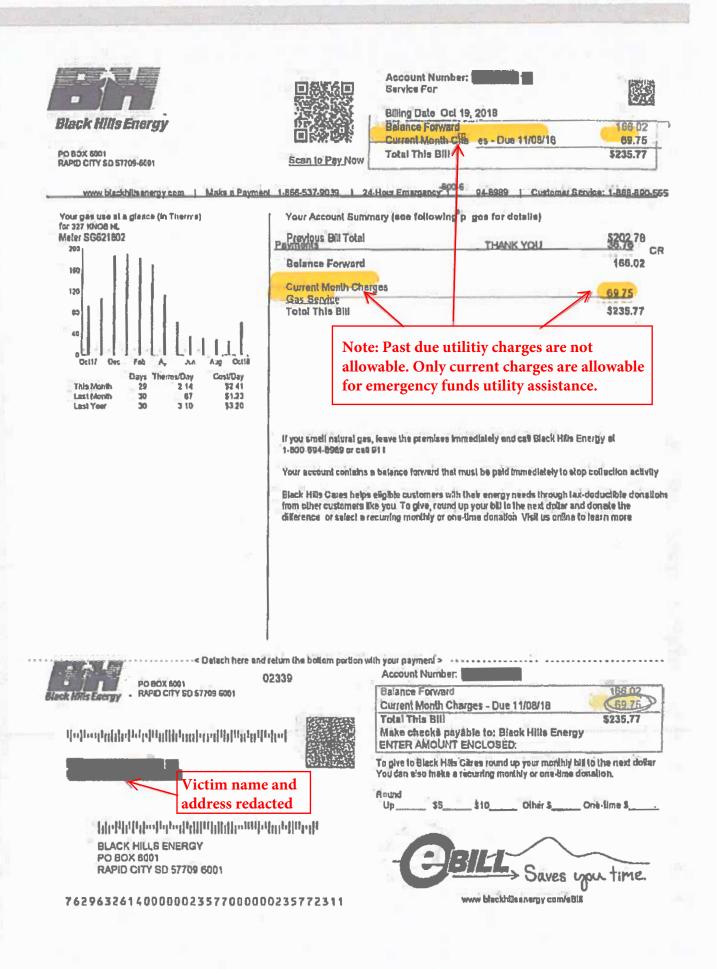
- Landlord name
- Rent amount (usually on first page, but may be on the second page)
- Signature page to ensure contract agreement (usually found on last page)
- If landlord name does not match vendor name to be used on payment, there must be documentation to explain the difference
- Victims name, address, signature/ any initials must be redacted.

Agency Expense Authorization Form

		Check Requisition	INC.		
		Vendor #		Date: <u>11/</u>	13/18
PAYMENT TO: Name:	Jessie Messen			Ÿ	
Address	PO Box 104				
	Austin, CO 8	1410		. <u></u>	
CHECK TO BE MAILED TO	ABOVE X				
OTHER DISPOSITION OF C	:HECK:				
REASON FOR PAYMENT:			Victin	n name is	not used
First and last month	s rent for housing	client CF-1110			
Account5180-6	Number	NG APPROVAL		nount [Amount includes first and last month's rent
		1	TOTAL	\$1800.00	
SIGNATURE		APPROVE	D BY	Description	
	SUBMIT ORIG	INAL TO ACCOUNTS	S PAYABLI		nt Authorization

UTILITIES ASSISTANCE EXAMPLES

٨٩٩	ency Expense Autho	orization Fo	rm	
Age	ancy capense Autil			
		m	c	
	Check Regulsi	tion		
	Vendor	ŧ	Date: 11/5/2018	
PAYMENT TO: Name:Bl.ack	Hills Energy			
Address: PO-B				
	City SD 57709-6001			
CHECK TO BE MAILED TO ABOVE	x			
OTHER DISPOSITION OF CHECK:	Include ct address with-c	heck so Black h	illis can credit the amo	unt to
the correct account		-		
REASON FOR PAYMENT:	Clien	t name not	used	
Natural Ras bill for housing c	t <u>CF-1031</u>			
A	CCOUNTING APPROVAL	47		
Account Number	Grant	1	Amount	
5190-6834	- DVVOCAHOUSES	<u>80-18</u> —	<u>\$69.75</u> -	
÷				Payment
		TOTAL	\$69.75	Authorizati
				K
SIGNATURE	AP	PROVED BY		\underline{O}
	APP			\underline{O}





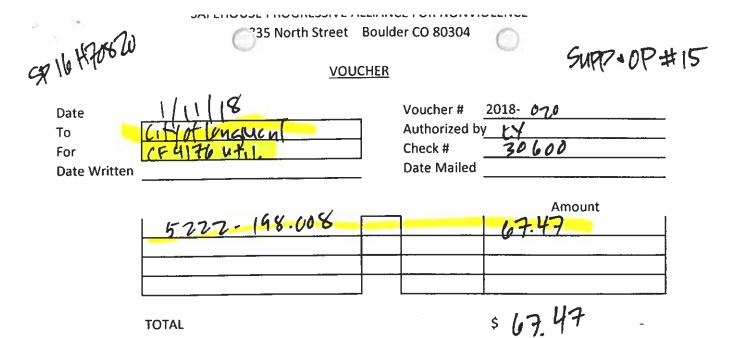
Agency Expense Authorization Form

)304 |623 |424 |169

CVS/VOCA Grant Funds Request

$\frac{176 \text{ Date: } 1/10/18}{\text{Safe?: } 2 \text{ Yes } 1 \text{ No}}$
\$67.47
8
erm financial difficulties and needs EAP (for heating costs) and the rest of her utilities starting next
y Billing
account number: 507413-
23 D N
Email:
and the second
If ho, reason:
Check #:

-		~			~	
	OT LONG	0	ELECTRIC SER		Electric usage (kW/h) = 500 400 300	
	CITY OF LON STATEMENT FOR UTILI Customer:		Electric subtotal Monthly service fee 3.275% city sales tax TOTAL ELECTRIC	\$35.49 \$12.40 \$1.57	200	
	Account No: 507413		SERVICE	\$49.46	J F M A M J J A S A This Year A Last Year	OND
	Service Address:				SEE BACK FOR USAGE DETAIL	.s
	APT 90				OTHER SERVICES Storm drainage	\$13.05
	Bill date: 12/20/17	\$50.39			Parks and greenway maintenance fee	\$2.00
	Thank you for paying: Balance DUE NOW	\$0.00 \$50.39			Waste Management Fee TOTAL OTHER SERVICES	\$2.96 \$18.01
	Current charges Due 01-13-2018	\$67.47	<i>6</i> *			
	TOTAL DUE	\$117.86	an an s			
		^ي .	•			
	PAY ONLINE www.LongmontColorado	o.gov				
	PAY OVER THE PHONE W CREDIT CARD 303-774-4 5 BILLING INQUIRIES 303-6	370	Save time, save mo View and pay y utility bill onlin	our		
	FOR SERVICE INQUIRIES Longmont Power & Com 303-651-8386 To report a power outag Water/wastewater: 303- Trash/recycling: 303-651	e: 303-776-0011 651-8468	Sign up at LongmontColor for online utility billing. Re your bill by email and pay credit or debit card throug secure online payment sys	eceive with a th our		
	CITY OF LONGMON STATEMENT FOR UTILITY S	ERVICES		Customer Account N Service Ad Your previce Current ch Total Due	dress: APT 90 bus balance (DUE NOW)	\$50.39 \$67.47 \$117.86
	Utility Billing E 417 BRIDGE ST DANVILLE, VA 2	#O2LNGMNT			Amount Enclosed	
	7285 1 AB 0.400 ******* AUTO**ALL FOR I 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	¹	61 7431 35 5007285 Yliliii[ii]]	350 H LONG	OF LONGMONT UTILITY BILLING KIMBARK STREET SMONT,CO 80501-5500 	ղվիդը։
			Page 16	0022		



Skip to main content Check Details **Check Number** 30600 **Date Posted** 01/19/18 **Check Amount** \$67.47 -----WELLS FAROD BANK, NA COLORADO welsturge.com 20-7/1030 30600 PAY TO THE ORDER OF City of Longmont \$ **67.47 Sixty-Seven and 47/100**** DOLLARS ----**City of Longmont** Page MEMO Ann) 607413, 69049

	n Name Rec	Victim Address R	edacted Account Number .	
	WS R1 (CO 104) 80821802 10/18/18 09/19/18 29 days	S GES Service for 3730 3656 72 Hundred Cubic Feet (CCF) x 0 8405 Ges Pressure Factor x 1.0240 87U Factor E2 Total Billable Therms 2 14 Therms 3 10 Therms	Billing Delaits for 09/18/18 - 10/18/18, 29 days. Customer Charge Distribution Chg 02 Therms @ \$0.2383 DSMCA DSMCA 02 Therms @ \$0.0117 Commodity Cost 62 Therms @ \$0.3223 Upstreem Cost 62 Therms @ \$0.3233 Upstreem Cost 62 Therms @ \$0.2637 Franchise Fee \$65 12 @ 3% City Sales Tax \$67 07 @ 2% County Sales Tax \$67.07 @ 2% Total Clarge Lists Service	11.49 14.77 0.56 0.73 10.08 17.59 1.05 1.34 \$69.78
Payments: 10/09/2018 Total Payments	B	36.76 CR \$36.76 - CR		

Deposit Billing Summary.	
Total deposit required	266.00
Doposit on hand	99,98
Tolal deposit unpeld	\$166,02

Important Information

For a complete description of terms and fees on your bill or for more tartif or rate schedule information, please contact us or visitwww.blackhildsenergy.com/rates.

Access your account at www.blacidshiemargy.com.ts

Update your mailing address

Enrol In Automatic Bank Transfer for electronic payments

Sign up for aBill to receive paperless bits and make FREE online payments

Obtain PDF copies of previous bijs

View usage, bling, payment history, and morali

When you provide a check as payment, you authorize us either to use information from your check to make a one-line electronic fund transfer from your account or to process the payment as a check transaction.

LEGAL SERVICES EXAMPLES

INVOICE LLC LLC WARD WARD Suite 201 Parker, CO United States Balance \$750.00 Invoice # 00219 January 23, 2018 **Invoice Date Payment Terms** Lawyers for Victims Program **Due Date**

Flat Fees

Date	Item	Description	Amount
01/23/2018	Flat Fee		750.00

Flat Fee Total: \$750.00

Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
Non-billable	Time Er	ntries:				
11/14/2017	VR	Legal Services	Download protection order documents and review; telephone call with client re: hearing.	250.00	0.4	100.00
11/14/2017	VR	Legal Services	Drafted documents; 1) Consent to Represent, 2) Notice of Completion and 3) Notice of Limited Appearance	250.00	0.3	75.00
11/14/2017	VR	Legal Services	Called client to review case. Left a message.	250.00	0.1	25.00
11/15/2017	VR	Legal Services	Telephone call with witness for client.	250.00	0.5	125.00
11/16/2017	VR	Legal Services	Telephone call with client re: proof of service and police report.	250.00	0.1	25.00
11/16/2017	VR	Legal Services	Telephone call with client re: testimony.	250.00	1.0	250.00
11/16/2017	VR	Legal Services	Called client at 1:17 PM Regarding Proof and Copy of report. Left a message	250.00	0.1	25.00
11/16/2017	VR	Legal Services	Sent Copy of Service in the mail and copy of police report.	250.00	0.2	50.00
11/18/2017	VR	Legal Services	Review police report; draft testimony for client and witnesses; prepare exhibits.	250.00	1.0	250.00
11/18/2017	VR	Legal Services	Called witness, /	250.00	0.2	50.00
11/20/2017	VR	Legal Services	Talked to witness, manufacture,	250.00	0.5	125.00

11/20/2017	VR	Legal Services	Called client to review the case. Left a message.	250.00	0.1	25.00
11/20/2017	VR	Legal Services	Called witness, be to be the control regarding testimony.	250.00	0.4	100.00
11/20/2017	CAB	Legal Services	drafted Subpoena to Attend	125.00	0.3	37.50
01/22/2018	VR	Legal Services	Attend permanent protection order hearing 9:15 a.m 11:15 a.m.	250.00	2.0	500.00

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Totals: 7.2 \$0.00

1.1

Notes:		Flat Fee Sub-Total:	750.00	
		Time Entry Sub-Total:	0.00	
8	LLC has provided serviced as part of the Lawyers for Victims Program	Sub-Total:	750.00	
		Total:	750.00	
		Amount Paid:	0.00	
		Balance Due:	\$750.00	/
			YONK	2

WARDS -

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2016-VA	0	Agenc	y Expense Autho <u>VOUCHER</u>		CONSULT	CINTRACT #2
	Date: 2.8	18 IAWERS	in	Voucher Nur	nber: <u>20-18_0</u>	76
	For: <u>LFVP</u> Date Written:		e Mailed:	heck #: <u>306</u>	Suzy Sm Suzy Sm prized by: Manage	íth, LVP Program er
	4 3 2 4	Account Char		Amount 750.00		
		Fotal Amount of Cl	neck:	0.00		30676
Date 1/23	Law Firm Type Refe /2018 Bill 0021	rence 9	Original Amt. 750.00	Balance Due 750.00	2/8/2018 Discount Check Amount	Payment 750.00 750.00

Cash - Checking