

OREGON DEPARTMENT OF JUSTICE



STOP VIOLENCE AGAINST WOMEN ACT (VAWA) AND SEXUAL ASSAULT SERVICES PROGRAM (SASP) GRANT MANAGEMENT HANDBOOK

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The (CVSD) is the State Administrative Agency (SAA) for STOP Violence Against Women Act (VAWA) and the Sexual Assault Services Program (SASP) Formula Grant Programs. CVSD has prepared this Grant Management Handbook to assist grantees in complying with state and federal requirements.

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Note: Portions of the Grant Management Handbook have not been updated to include the new VAWA Reauthorization Act of 2013 rules and regulations; updates will be incorporated when CVSD receives final guidance from OVW.

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INTRODUCTION

HISTORY OF THE STOP VAWA FORMULA GRANT PROGRAM

In 1994, Congress enacted the Violence Against Women Act (VAWA). This Act implements the Violence Against Women Formula Grant Program, as authorized by the Omnibus Crime Control and Safe Streets Act of 1968, as amended by Title IV of the Violent Crime Control and Law Enforcement Act of 1994, and the Victims of Trafficking and Violence Protection Act of 2000, Public Law 106-386. This program authorizes population-based grants to states which are subgranted to state agencies, public or private non-profit organizations, units of local governments, non-profit, non-governmental victim services programs, and legal services programs for victims. This program is administered by the United States Department of Justice, Office of Justice Programs, Office on Violence Against Women (OVW).

PURPOSE OF THE STOP VIOLENCE AGAINST WOMEN PROGRAM

The VAWA Program encourages the development and implementation of effective law enforcement and prosecution strategies to combat violent crimes against women. The goal of the program is to encourage states and localities to restructure and strengthen the criminal justice systems' response to be proactive in addressing violence against women, drawing on the experience of all of the participants in the system, including the advocacy community. The STOP Program requires each state to develop an Implementation Plan and authorizes states to allocate funds to programs that advance the Plan. A copy of the most recent Oregon Statewide Implementation Plan (FY 2010 – 2012)¹ may be found at http://www.doj.state.or.us/victims/pdf/2010-2012_stop_vawa_implementation_plan.pdf

The addendum for the plan may be found at:

¹ The FY 2010 – 2012 STOP VAWA Implementation Plan for Oregon is effective through June 30, 2014.

http://www.doj.state.or.us/victims/pdf/2010-2012_stop_vawa_implementation_plan_addendum.pdf

Programs must fall within one of fourteen authorized STOP Purpose Areas established by U.S. Congress (42 U.S.C. § 3796gg (b)).

STOP VAWA ALLOCATION OF FUNDS

Each state must allocate the VAWA funds in the following manner:

- 25% to prosecution projects
- 25% to law enforcement projects
- 30% to victim services projects (*10% of which must be distributed to culturally specific community based organizations*). *The 10% discretionary funds are included with victim services projects.*
- 5% for state and local courts and judicial projects

HISTORY OF THE SEXUAL ASSAULT SERVICES GRANT PROGRAM

The Sexual Assault Services Program (SASP), created by the Violence Against Women Act of 2005 (VAWA 2005), is the first federal funding stream solely dedicated to the provision of direct intervention and related assistance for victims of sexual assault. This program encompasses four different funding streams for States and Territories, Tribes, State Sexual Assault Coalitions, Tribal Coalitions, and culturally specific organizations. This funding stream, a state funded formula grant, authorizes grants to states which are subgranted to non-profit, non-governmental organizations whose primary purpose is to provide primary direct services to sexual assault victims. This includes dual domestic violence programs that provide primary direct services to sexual assault victims. This program is administered by the United States Department of Justice, Office of Justice Programs, Office on Violence Against Women (OVW).

CRIME VICTIMS' SERVICES DIVISION

PURPOSE OF THE SEXUAL ASSAULT SERVICES GRANT PROGRAM

Overall, the purpose of the SASP Program is to provide intervention, advocacy, accompaniment, support services, and related assistance for adult, youth, and child victims of sexual assault, family and household members of victims, and those collaterally affected by the sexual assault.

The SASP Program supports efforts to help survivors heal from sexual assault trauma through direct intervention and related assistance from social service organizations such as rape crisis centers through 24-hour sexual assault hotlines, crisis intervention, and medical and criminal justice accompaniment. The SASP will support such services through the establishment, maintenance, and expansion of rape crisis centers and other programs and projects to assist those victimized by sexual assault.

The Oregon Department of Justice (DOJ), Crime Victims' Services Division (CVSD) is the State Administrative Agency (SAA) for the STOP VAWA Program. CVSD makes subawards to State and local units of government, non-profit agencies, and tribal governments.

CVSD has prepared this Grant Management Handbook to assist grantees in complying with state and federal requirements. Federal fiscal requirements are set forth in the 2013 Office on Violence Against Women (OVW) Financial Grants Management Guide. This document is available at www.ovw.usdoj.gov/grantees.html or online at <http://www.ovw.usdoj.gov/docs/ovw-fgmg.pdf>. The Grants Financial Management Division (GFMD) provides policy guidance and support services for OVW in all matters related to financial grants management of its programs.

The Crime Victims' Services Division (CVSD) of the Oregon Department of Justice has specific program responsibility for VAWA (as authorized through ORS 147.231) and other grants related to serving victims of crime such as the Sexual Assault Services (SASP) Formula Grant Program and the American Recovery and Reinvestment Act under the STOP VAWA Formula Grant Program).

VAWA AUTHORIZED PURPOSE AREAS

Program Area	Purpose Area
1 Training	Train law enforcement, judges, court personnel, and prosecutors to more effectively identify and respond to violent crimes against women including the crimes of sexual assault, domestic violence, and dating violence.
2 Enhancement Efforts	Develop, train or expand units of law enforcement, judges, other court personnel, and prosecutors specifically targeting violent crimes against women including the crimes of sexual assault and domestic violence.
3 Policy and Protocol Development	Develop and implement more effective law enforcement, court, and prosecution policies, protocols, orders, and services devoted to preventing, identifying and responding to violent crimes against women including the crimes of sexual assault and domestic violence.
4 Data Collection and Communication Systems	Develop, install, or expand data collection/communication systems linking law enforcement, prosecution, and courts to identify and track arrests, protection orders, violations of orders, prosecutions, and convictions for violent crimes against women including sexual assault and domestic violence to report data to the National Instant Criminal Background Check System.
5 Victim Service Programs	Develop, enlarge, or strengthen victim service programs including sexual assault, domestic violence, and dating violence programs; develop or improve victim services delivery to underserved populations; provide specialized domestic violence court advocates where protection orders are frequently granted; increase case reporting; and reduce attrition rates for cases.
6 Stalking Programs	Develop, expand, or strengthen programs to address stalking.
7 Indian Tribal Sexual Assault and Domestic Violence Programs	Developing, enlarging, or strengthening programs addressing the needs and circumstances of Indian tribes dealing with violent crimes against women, including the crimes of sexual assault and domestic violence.
8 Statewide Multi-disciplinary Support	Supporting formal and informal statewide, multidisciplinary efforts, to the extent not supported by state funds, to coordinate the response of state law enforcement agencies, prosecutors, courts, victim services agencies, and other state agencies and departments, to violent crimes against women, including the crimes of sexual assault, domestic violence, and dating violence.
9 Sexual Assault Nurse Examiners (SANE)	Train sexual assault forensic medical examiners in collection and preservation of evidence, analysis, and prevention for expert testimony, and to provide treatment of trauma related to sexual assault.
10 Elder and Disabled Victims	Developing, enlarging, or strengthening programs to assist law enforcement, prosecutors, courts, and others to address the needs and circumstances of older and disabled women who are victims of domestic violence or sexual assault, including recognizing, investigating, and prosecuting instances of such violence or assault and targeting outreach and support, counseling, and other victim services to such older and disabled individuals.
11 Immigration	Providing assistance to victims of domestic violence and sexual assault in immigration matters.
12 New Initiatives and Emergency Services	Maintaining core victim services and criminal justice initiatives, while supporting complementary new initiatives and emergency services for victims and their families.

<p>13 Jessica Gonzales Victim Assistants</p>	<p>Supporting the placement of special victim assistants in local law enforcement agencies to serve as liaisons between victims of domestic violence, dating violence, sexual assault, and stalking and personnel in local law enforcement agencies in order to improve the enforcement of protection orders. Jessica Gonzales Victim Assistants shall have expertise in domestic violence, dating violence, sexual assault or stalking and may undertake the following activities:</p> <ul style="list-style-type: none"> a. Developing, in collaboration with prosecutors, courts and victim service providers, standardized response policies for local law enforcement agencies, including triage protocols to ensure that dangerous or potentially lethal cases are identified and prioritized. b. Notifying persons seeking enforcement of protection orders as to what responses will be provided by the relevant law enforcement agency. c. Referring persons seeking enforcement of protection orders to supplementary services (such as emergency shelter programs, hotlines or legal assistance services). d. Taking other appropriate action to assist or secure safety of person seeking enforcement of a protection order. <p><i>*Note: Only government-based agencies may apply for funding to support project activities under this purpose area.</i></p>
<p>14 Crystal Judson Domestic Violence Protocol Program</p>	<p>To provide funding to law enforcement agencies, nonprofit, nongovernmental victim services providers, and State and local governments to promote:</p> <ul style="list-style-type: none"> a. The development and implementation of training for local victim domestic violence service providers, and to fund victim service personnel, to be known as Crystal Judson Victim Advocates, to provide supportive services and advocacy for victims of domestic violence committed by law enforcement personnel. b. The implementation of protocols within law enforcement agencies to ensure consistent and effective responses to the commission of domestic violence by personnel within such agencies. c. The development of such protocols in collaboration with State, tribal, territorial and local victim service providers and domestic violence coalitions. d. Any law enforcement, State, tribal, territorial or local government agency receiving funding under the Crystal Judson DV Protocol Program shall on an annual basis, receive additional training on the topic of incidents of domestic violence committed by law enforcement personnel from DV and SA non-profit organizations and, after a period of two years, provide a report of the adopted protocol to DOJ, including a summary of progress in implementing that protocol.

SASP FEDERAL PURPOSE AREAS

By statute, funds under the SASP Formula Grant Program may be used for the following purpose:

- To support the establishment, maintenance, and expansion of rape crisis centers and other nongovernmental or tribal programs and projects to assist those victimized by sexual assault, without regard to the age of the individual.

CVSD will use SASP Formula funds to provide grants to rape crisis centers¹ and other non-profit, nongovernmental organizations or tribal programs for programs and activities that provide direct intervention and related assistance. Intervention and related assistance may include any of the following statutory program purposes:

- 24-hour hotline services providing crisis intervention services and referral;

- Accompaniment and advocacy through medical, criminal justice, and social support systems, including medical facilities, police, and court proceedings;
- Crisis intervention, short-term individual and group support services, and comprehensive service coordination and supervision to assist sexual assault victims and non-offending family or household members;
- Information and referral to assist the sexual assault victim and non-offending family or household members;
- Community-based, culturally specific services and support mechanisms, including outreach activities for underserved communities; and
- The development and distribution of materials on issues related to the services described in the previous bullets.

¹The term “rape crisis center” means a nonprofit, nongovernmental, or tribal organization, or government entity in a state that provides intervention and related assistance to victims of sexual assault without regard to their age. In the case of a governmental entity, the entity may not be part of the criminal justice system (such as a law enforcement agency) and must be able to offer a comparable level of confidentiality as a nonprofit entity that provides similar victim services,

FEDERAL ELIGIBILITY CRITERIA AND STATE PRIORITIES

FEDERAL ELIGIBILITY CRITERIA

The State of Oregon *and its subgrantees* must meet certain federal eligibility criteria established by the Violence Against Women and Department of Justice Reauthorization Act of 2005 <http://www.usdoj.gov/ovw/regulations.htm> in order to receive VAWA grant funds.

Costs for Criminal Charges and Protection

Orders State, local or tribal laws, policies, and practices shall not require, in connection with the filing, issuance, registration or service of a protection order, or a petition for a protection order, to protect a victim of domestic violence, stalking or sexual assault, that the victim bear the costs associated with the filing of criminal charges against the offender, or the costs associated with the filing issuance, registration or service of a warrant, protection order, petition for a protection order, or witness subpoena, whether issued inside or outside of the state, tribal or local jurisdiction. (See also *Oregon Revised Statute 107.718 (8) (c).*)

Forensic Medical Examination The state, Indian tribal government, unit of local government or another governmental entity shall incur the full out-of-pocket cost of forensic medical exams for victims of sexual assault. (See also *OAR 137-084-0020(1), 137-084-0020(4)* and http://www.doi.state.or.us/crimev/sex_aslt_vtms_e_mrf.shtml regarding the *Sexual Assault Victims' Emergency Medical Response (SAVE) Fund.*) The state, Indian tribal government, unit of local government or another governmental entity will not require victims of sexual assault to participate in the criminal justice system or cooperate with law enforcement in order to be provided with a forensic exam, reimbursement for the cost of the exam, or both. (See also *Oregon Revised Statute 147.397.*)

Judicial Notification The State of Oregon and local judicial administrative policies and practices include notification to domestic violence offenders of the requirements delineated in section 922(g)(8) and (g)(9) of title 18 of the United States Code, and any applicable related Federal, State, or local gun laws. (See also *Oregon Revised Statute 135.385.*)

Polygraph Testing Prohibition

No law enforcement officer, prosecuting officer or other government official shall ask or require an

adult, youth, or child victim of an alleged sex offense as defined under Federal, Tribal, State, or local law to submit to a polygraph examination or other truth telling device as a condition for proceeding with the investigation of such an offense. The refusal of a victim to submit to an examination shall not prevent the investigation, charging, or prosecution of the offense. (See also *Oregon Revised Statute 163.705.*)

CONFIDENTIALITY

Grantees shall protect the confidentiality and privacy of persons receiving services to ensure the safety of adult, youth, and child victims of domestic violence, dating violence, sexual assault, or stalking. This means that grantees will not disclose any personally identifying information or individual information collected in connection with services requested, utilized, or denied through programs; or reveal individual client information without the informed, written, reasonably time-limited consent of the person (or in the case of an un-emancipated minor, the minor and the parent or guardian or in the case of persons with disabilities, the guardian) about whom information is sought, whether for this program or any other Federal, State, tribal, or territorial grant program, except that consent for release may not be given by the abuser of the minor, person with disabilities, or the abuser of the other parent of the minor.

If release of information as described is compelled by statutory or court mandate, the grantee shall make reasonable attempts to provide notice to victims affected by the disclosure of information; and shall take steps necessary to protect the privacy and safety of the persons affected by the release of the information.

Grantee may share (1) non-personally identifying data in the aggregate regarding services to their clients and non-personally identifying information in order to comply with Federal, State, tribal, or territorial reporting, evaluation, or data collection requirements; (2) court-generated information and law enforcement generated information contained in secure, governmental registries for protection order enforcement purposes; and (3) law enforcement and prosecution generated information necessary for law enforcement and prosecution purposes.

The term “personally identifying information”, “individual information”, or “personal information” means individually identifying information for or about an individual of a victim of domestic violence, dating violence, sexual assault, or stalking, including (1) a first and last name; (2) a home or other physical address; (3) contact information (including a postal, e-mail or Internet protocol address, or telephone or facsimile number); (4) a social security number; and (5) any other information, including date of birth, racial or ethnic background, or religious affiliation, that, in combination with any other non-personally identifying information would serve to identify any individual.

Non-Discrimination Provision. Subrecipients must comply with the Violence Against Women Reauthorization Act or 2013 prohibition from excluding, denying benefits to, or discriminating against any person on the basis of actual or perceived race, color, religion, national origin, sex, gender identity, sexual orientation, or disability in any program or activity funded in whole or in part by the Office on Violence Against Women (OVW).

STATE STOP VAWA PROGRAM PRIORITIES

In shaping strategies for STOP VAWA funding, programs are encouraged to develop projects that support at least one of the following priorities as identified by the Oregon VAWA Advisory Board. These priorities are detailed in the Statewide Implementation Plan for Oregon which may be found at:

<http://www.doj.state.or.us/victims/pages/vawa.aspx>

The *Implementation Plan* establishes the Oregon VAWA Advisory Board’s priorities for projects receiving funding. These are to:

- **Provides multiple federal and state grants that support programs across the state. VAWA specific funding, in combination with other federal and state funds, will assist in stabilizing programs and ensure victims have meaningful access to services;** Applicants are encouraged to provide appropriate agency responses to victims’ needs. This includes directly linking victims whose primary needs may be beyond the applicant’s expertise to an appropriate partner agency.

- **Support services to meet the needs of one or more groups of victims from underserved, marginalized and/or oppressed populations and/or Tribal Nations. Additionally, to increase the delivery of culturally competent services within the agency as a whole;** Applicants are encouraged to continue or begin an assessment and planning process to identify and prioritize community needs and culturally competent agency responses. The *Cultural Competency Standards* distributed by DOJ CVSD is a resource for this planning process. Applicants may review the *Standards* at the website:

<http://www.doj.state.or.us/crimev/vawa.shtml>

- **Allocate STOP VAWA Formula Grant Program funds for training projects** (statewide, regional or local), **and**
- **Ensure consultation and planning between non-profit, non-governmental victim services or community-based or faith-based organizations and law enforcement, prosecution and courts.** Applicants are required to develop and implement their proposed project activities through a collaborative process with the agencies and organizations in the communities that will be impacted by the project activities.

Projects that are funded through the STOP Program conduct activities that reflect the priorities and values set forth in the *Implementation Plan* and fall within the scope of one or more of the STOP Program’s federal statutory purpose areas.

STATE SASP PROGRAM PRIORITIES

In shaping strategies for SASP funding, programs must develop projects that address the needs of adult, youth or child victims of sexual assault who are members of underserved communities. The SASP Formula Grant Program priorities are to:

- Enhance and strengthen meaningful access to population specific and culturally proficient services to adult, youth and child victims of sexual assault who are members an underserved population, including services to family and household members of such victims and those collaterally affected by the victimization.

- Direct funding to address one or more of the gaps identified in the [Assessment of Services to Survivors of Sexual Assault Survey](#) and the [2014 Sexual Assault Underserved Populations Survey](#): Advocacy Services, Counseling and support Group Services, Emergency Financial Support Services, Medical and Legal Accompaniment, System Collaboration and Outreach, and other locally documented service gaps.
- Direct funding to organizations that can demonstrate a track record of providing population specific services.
- Enhance equitable distribution of grants and grant funds in rural areas.

GENERAL PROVISIONS

AGREEMENT

Crime Victims' Services Division (CVSD) recommends programs for funding to the Attorney General's Office.

Once an award is granted, CVSD negotiates program and budget details with the applicant. When an agreement is reached, the grantee and CVSD sign the grant award and conditions, known as the grant agreement.

The grantee agrees to implement the program, work toward the objectives, and spend funds in accordance with the signed grant agreement.

Modifications to the grant agreement or budget must be requested in writing. In no event may the conditions of the grant be modified without prior approval from CVSD.

Failure of the grantee to operate the program in accordance with the written, agreed upon objectives or budget may constitute immediate grounds for suspension and/or termination of the grant agreement and de-obligation of unspent funds.

PROGRAM AND FISCAL MONITORING

CVSD monitors each grant to assure the grantee is operating the project as agreed, that the grantee is working towards its objectives, and that the grantee is following appropriate federal fiscal procedures. Monitoring shall include one on-site visit every two years and as needed for technical assistance.

After reasonable notice and as often as CVSD may deem necessary during the grant award period, CVSD may perform program and fiscal monitoring activities. Monitoring may be conducted on-site and may include review of program and fiscal records, policies and procedures, meetings with sub-recipients, program stakeholders, and/or any staff directly or indirectly involved in the performance of the award program. Monitoring visits are intended to

ensure compliance with award and fiscal requirements, to provide technical assistance, to offer program development guidance, and for observation of program activities.

PROGRAM PRESENTATION

In addition to on-site monitoring, STOP VAWA competitively funded programs (law enforcement, prosecution or court allocation categories) may be asked to make a presentation on program progress at scheduled meetings of the VAWA Subcommittee.

SUPPLANTING

Federal funds must be used to **supplement** existing funds and not replace (supplant) non-federal funds which have been appropriated for the same purpose. Grant funds may not be used to pay for program activities that the recipient is already obligated to pay or has already funded. Grant funds must be used to increase the total amount of funds available to deliver program services. The rules governing supplanting also apply to any funds used as match.

Supplanting may be a subject of post-award monitoring and audit. If there is a potential presence of supplanting, the grantee may be required to supply documentation demonstrating that the reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds.

OVW has provided further guidance on the non-supplanting prohibition as it applies to Non-profit Organizations:

<http://www.ovw.usdoj.gov/docs/supplanting-examples.pdf>

MATCH FUNDS

The purpose of matching contributions is to *increase* the amount of resources available to a program supported by grant funds. Funds allocated for use as match must be used to support a federally-funded program and must be in addition to, and therefore supplement, funds that would otherwise be made available for the stated program purpose.

Grantees must maintain records that clearly show the source, the amount, and the period during which the match was allocated. Grantees must ensure that match is identified in a manner that guarantees its accountability during an audit.

All conditions that apply to grant funds apply to match funds. All funds designated as match are restricted to the same uses as the STOP VAWA program funds and must be expended within the grant period.

Further guidance on the calculation, documentation, and auditing of the match requirement can be found in the OJP Financial Guide, Part III, Chapter 3, and in the OMB Circular No. A-110, Subpart C, Section 23.

MATCH FUNDS FOR VAWA FUNDED PROGRAMS

Federal funds may pay no more than 75 percent of the cost of a program. The remaining 25 percent (match) must be paid from the grantee's own non-federal sources, either as a cash contribution or as in-kind services. Matching contributions need not be applied at the exact time or in proportion to the obligation of federal funds. However, the full match amount must be provided and obligated by the end of the grant period. Match and grant funds constitute program funds. Grantees must report on match funds.

The costs of activities attributed as match must be directly related to the project goals and objectives. For example, if half a law enforcement officer's time is supported with grant funds and the other half is attributed as match, the officer must track all of their time to demonstrate that 50 percent of it was devoted to the grant-funded project. In-kind match must be documented in the same manner as grant-funded activities.

Tribes and victim service providers are exempt from the standard match requirement.

All other STOP Program subgrantee agencies (i.e., prosecution, law enforcement, and courts) are required to provide match.

Cash match for VAWA-funded programs

Cash match contributions may be used to support the STOP Program funded project. Cash match must be from a non-federal source, must be spent on allowable program-related costs, and must be

included in the grantee's financial records. Cash match may include funds from state and local units of government or contributions from private organizations or individuals, program income and the related interest earned on that program income.

In-kind match for VAWA-funded programs

In-kind match may include donations of expendable equipment, office supplies, workshop or classroom materials, work space, or the monetary value of time contributed by professional and technical personnel and other skilled and unskilled labor if the services they provide are an integral and necessary part of the STOP Program funded project activities.

The value placed on loaned or donated equipment may not exceed its fair rental value. The value placed on donated services must be consistent with the rate of compensation paid for similar work in the organization or the labor market. Fringe benefits may be included in the valuation. Volunteer services must be documented and, to the extent feasible, supported by the same methods used by the recipient organization for its own employees. The value of donated space may not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in a privately owned building in the same locality.

The basis for determining the value of volunteer services, materials, equipment, and space must be documented.

Following are some specific examples of possible sources of match for proposed projects:

- If an entity other than the subgrantee donates office space free of charge to the subgrantee for the project, the rental value of the space may be used as match. For example, a police department may donate office space to house a Domestic Violence Coordinator to develop and implement new policies, protocols and procedures designed to enhance a coordinated community response to domestic violence. Similarly, the cost of utilities, insurance, security, janitorial services and the like may be used as in-kind match to the extent they are not being paid out of grant funds. Projects also may receive short-term donations of space, such as a room to hold a

meeting or a training event, which may be used as match.

- The salaries of any employees of the subgrantee that are working on grant-related purposes but are not paid with grant funds may be used. For example, the portion of an executive director's time spent in support of the STOP Program funded FTE, a police officer or prosecutor working on sexual assault cases in partnership with the STOP Program funded FTE, or other similar employees could be used as match to the extent that they are not paid by Federal funds.
- Any volunteers involved in the project, such as trainers and speakers, pro bono attorneys and other professional or people volunteering to give public presentations about the subgrantee or about violence against women, may be used as match. Time volunteered as a member of a Board of Directors for a nonprofit agency may not be used as match.
- Subgrantees also may receive donations of services related to the project that can be used as match. For example, a local printing company may agree to print some training materials at no cost to the project. Other examples of donated services may include web space and services, other computer services, legal services, translation services, telephone services and accounting services for the program as well as psychological counseling, job training, medical services, taxi and hotel vouchers, and child care services for secondary victims.

Volunteer Hours While On-Call

The value of the donated service may not exceed the rate your agency would pay an employee to provide the same level of service. For example, if two victim assistants provide the same service, but one is paid and the other is a volunteer, you could use the same rate per hour for the volunteer that you pay your employee, including the salary and benefits associated with the paid position.

Similarly, if two victim assistants are considered "on-call" or carry a pager or cell phone, and provide a service as needed, you could use the same rate per hour for the volunteer that you would pay your employee for providing the same service. You may use the rate your agency would

pay an employee to be on-call, or for carrying a pager, or cell phone.

However, if your agency does not pay employees to be on-call, or to carry a pager or cell phone, then you would use the "going rate" in your area, for that service. Please check with other agencies in your area to determine what rate they pay their employees for providing an equivalent service.

MATCH FUNDS FOR SASP FUNDED PROGRAMS

A contribution of non-Federal dollars (match) is not required for this program, but applicants are encouraged to maximize the impact of Federal dollars by contributing to the costs of their projects. Supplemental contributions may be cash, in-kind services, or a combination of both.

SEXUAL ASSAULT SET-ASIDE FOR VAWA FUNDED PROGRAMS

As one of their priorities for funding, the VAWA Advisory Board earmarked a minimum of 25 percent of STOP funds for services to victims of sexual assault. Sexual assault services must be specific to adolescents and adults; these funds are not intended to provide services for child abuse or child sexual abuse.

For VAWA-funded programs that are providing sexual assault services, grantees must demonstrate through quarterly fiscal and semi-annual progress reports how grant funds are being allocated for sexual assault services.

AWARD CONDITIONS

FEDERAL AWARD CONDITIONS

CERTIFICATIONS REGARDING LOBBYING; DEBARMENT, SUSPENSION, AND OTHER RESPONSIBILITY MATTERS; AND DRUG-FREE WORKPLACE REQUIREMENTS

The grantee is required to certify the following:

- The grantee, and its subgrantees, contractors, and subcontractors, will not use federal funds for lobbying and will disclose any lobbying activities.
- The grantee and its principals have not been debarred or suspended from federal benefits and/or no such proceedings have been initiated against them; have not been convicted of, indicted for, or criminally or civilly charged by a government entity for fraud, violation of antitrust statutes, embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property; and have not had a public transaction terminated for cause or default.
- The grantee will provide a drug-free workplace.

CIVIL RIGHTS COMPLIANCE

All recipients of federal grant funds are required to comply with nondiscrimination requirements of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000d et seq. (prohibiting discrimination in programs or activities on the basis of race, color, and national origin); Omnibus Crime Control and Safe Streets Act of 1968, as amended, 42 U.S.C. §3789d(c)(1) (prohibiting discrimination in employment practices or in programs and activities on the basis of race, color, religion, national origin, and gender); Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794 et seq. (prohibiting discrimination in employment practices or in programs and activities on the basis of disability); Title II of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12131 (prohibiting discrimination in services, programs,

and activities on the basis of disability); The Age Discrimination Act of 1975, 42 U.S.C. § 6101-07 (prohibiting discrimination in programs and activities on the basis of age); and Title IX of the Education Amendments of 1972, 20 U.S.C § 1681 et seq. (prohibiting discrimination in educational programs or activities on the basis of gender).

Federal regulations require some recipients of financial assistance from the Office of Justice Programs (OJP) to prepare, maintain, submit for review, and implement an Equal Employment Opportunity Plan (EEO Plan). The purpose of an EEO Plan is to insure full and equal participation of men and women regardless of race or national origin in the workforce of the grantee. The regulations exempt a grantee from all of the EEO Plan requirements if any of the following apply:

- has less than 50 employees (counting both full- and part-time employees),
- is an educational institution,
- is a medical institution,
- is a non-profit organization,
- is an Indian tribe, or
- is receiving an award less than \$25,000.

Grantees that meet all of the following criteria are required to *maintain* an EEO Plan on file for review by DOJ/CVSD:

- have 50 or more employees; and
- have 3 percent or more minorities in service population (however, if less than 3 percent minorities in service population, an EEO Plan must still be prepared, but must focus on employment practices affecting women only); and
- received a total of \$25,000 or more in grants or subgrants.

Grantees that meet the first two criteria and receive over \$500,000 (or over \$1 million during an 18-month period) are required to *submit* an EEO Plan or an EEO Plan Short Form to DOJ/CVSD for review. Information for completing an EEO Plan or an EEO Plan Short Form can be found at: www.ojp.usdoj.gov/ocr/eeop.htm.

Within 60 days of receipt of award, grantees must submit proof of the Certification of EEO Compliance and, as appropriate, submit an EEOP or an EEOP Short Form to DOJ/CVSD. Grantees that claim a complete exemption from the EEOP requirement should complete Certification A. Grantees that claim the exemption from the EEOP submission requirement should complete Certification B. Grantees that are required to complete an EEOP should complete either Certification C1 or Certification C2. A grantee should complete only the *one* appropriate Certification.

Additionally, if a Federal or State court or Federal or State administrative agency makes an adverse finding of discrimination against the grantees organization after a due process hearing, on the ground of race, color, religion, national origin, or sex, your organization must submit a copy of the finding to OCR for review.

FEDERAL FUNDING ACCOUNTABILITY AND TRANSPARENCY ACT OF 2006

Dun and Bradstreet Data Universal Numbering System (DUNS)

As of January 1, 2009, all recipients and subcontractors of Federal VAWA funds must comply with the Federal Funding Accountability and Transparency Act of 2006 (FFATA) that requires certain information on Federal funding over \$25,000 be posted on the USASpending.gov website. This applies not only to the state as the primary Federal grantee, but to subgrantees as well. DOJ CVSD encourages all applicants and potential grantees to ensure that they are in compliance with the FFATA prior to applying for any federal grant funds. All subgrantees should make certain that their agency has a DUNS number and is registered with the System for Award Management (SAM).

In order to satisfy this requirement, subgrantees and their subcontractors receiving \$25,000 or more over the life of any sub-award (i.e., VAWA grant award period) will be required to have a DUNS number and to maintain a current registration with the SAM.

System for Award Management (SAM)

Registering with SAM is also required. All applicants applying for VAWA and SASP funds must obtain and maintain a current registration with the SAM. The SAM stores general information about federal financial assistance applicants, recipients, and subrecipients. You should first verify whether or not your agency already is registered with the SAM. Applicants must update or renew with the SAM at least once a year to maintain an active status. To register with the SAM, go to www.sam.gov.

There is a SAM User's Guide at https://www.sam.gov/sam/SAM_Guide/SAM_User_Guide.htm#_Toc330768952 which will assist you in this process. It will help answer questions that may come up during the registration process which may take up to one hour. You can save new information and return to the registration process where you left off should you not be able to complete it in one sitting.

LIMITED ENGLISH PROFICIENCY

National origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, and the Safe Streets Act of 1968 42 U.S.C. § 3789d, grantees are required to take reasonable steps to ensure that LEP persons have meaningful access to their programs. Meaningful access may entail providing language assistance services, including oral and written translation, when necessary. Grantees are encouraged to consider the need for language services for LEP persons served or encountered both in developing their proposals and budgets and in conducting their programs and activities. Reasonable costs associated with providing meaningful access for LEP individuals are considered allowable program costs. The U.S. Department of Justice has issued guidance for grantees to help comply with their civil rights responsibilities that recipients have in providing language services to LEP individuals. The guidance document can be accessed on the Internet at www.lep.gov.

EQUAL TREATMENT FOR FAITH-BASED ORGANIZATIONS

The Equal Treatment Regulation, codified at 28 C.F.R. Part 38, ensures that no organization will be discriminated against in a U.S. Department of Justice (DOJ) funded program on the basis of religion and that services are available to all regardless of religion. This regulation ensures a level playing field for the participation of faith-based organizations as well as other community organizations in VAWA or SASP-funded programs by:

- Prohibiting discrimination for or against an organization on the basis of religion, religious belief, or religious character in the administration or distribution of federal funds;
- Allowing a religious organization that participates in VAWA or SASP programs to retain its independence and continue to carry out its mission, provided that direct federal funds do not support any inherently religious activities. While inherently religious activities, such as worship, or religious instruction, are permissible, they must be separate in time or place from the funded program, and participation in such activities by individuals receiving services must be voluntary;
- Clarifying that faith-based organizations can use space in their facilities to provide VAWA or SASP-funded services without removing religious art, icons, scriptures, or other religious symbols; and
- Ensuring that no organization that receives VAWA or SASP funds can discriminate against a program beneficiary, or beneficiary, on the basis of religion or religious belief.

For more information on the regulation, please see OCR's website at:

<http://www.ojp.usdoj.gov/ocr/etfbo.htm>.

CONFIDENTIALITY AND HUMAN SUBJECTS PROTECTION

U.S. Department of Justice regulations (28 CFR Part 22) require recipients of OJP funding to submit a Privacy Certificate as a condition of approval of any grant application or contract

proposal that contains a research or statistical component under which "information identifiable to a private person" will be collected, analyzed, used, or disclosed. The funding recipient's Privacy Certificate includes a description of its policies and procedures to be followed to protect the confidentiality of identifiable data. 28 CFR Section 22.23. The Department's regulations provide, among other matters, that: "research or statistical information identifiable to a private person may be used only for research or statistical purposes." 28 CFR Section 22.21. Moreover, any private collected or obtained (either orally or by means of written questionnaire or other document) must be advised that the information will only be used or disclosed for research or statistical purposes and that compliance with the request for information is voluntary and may be terminated at any time. 28 CFR Section 22.27.

In addition, the Department of Justice has regulations with respect to the protection of human research subjects. See 28 CFR, Part 46. In brief, 28 CFR Part 46 requires that research involving human subjects that is conducted or supported by a federal department or agency be reviewed and approved by an Institutional Review Boards (IRB), in accordance with the regulations, before federal funds are expected for that research. As a rule, persons who participate in federally-funded research must provide their "informed consent" and must be permitted to terminate their participation at any time. Funded recipients, before they will be allowed to spend OJP funds on any research activity involving human subjects, must submit appropriate documentation to OJP showing compliance with 28 CFR Part 46 requirements, as requested by OJP.

General information regarding Data Confidentiality and Protection of Human Research Subjects (and Model Privacy Certificates and other forms) can be found on the following web sites:

www.ojp.usdoj.gov/forms.htm;

www.ojp.usdoj.gov/nij/funding/humansubjects/;

www.ojp.usdoj.gov/bjs/pub/pdf/bjsmpc.pdf; and

www.ojp.usdoj.gov/bjs/funding.htm.

NATIONAL ENVIRONMENTAL PROTECTION ACT (NEPA) REQUIREMENTS

Grantees must comply with the National Environmental Protection Act and other related federal environmental impact analyses requirements in the use of federal grant funds either directly by the grantee or by a subgrantee.

The STOP Violence Against Women Formula Grant Program implements certain provisions of the Violence Against Women Act, which was enacted in September 1994 as Title IV of the Violent Crime Control and Law Enforcement Act of 1994 and reauthorized in the Violence Against Women Act of 2000. The Program encourages the development and implementation of effective, victim-centered law enforcement, prosecution, and court strategies to address violent crimes against women and the development and enhancement of victim services in cases involving violent crimes against women. **None of the following activities covered by this special condition will be conducted under the OVW federal action:**

- New construction.
- Minor renovation or remodeling of a property either (a) listed on or eligible for listing on the National Register of Historic Places or (b) located within a 100-year flood plain.
- A renovation, lease, or any other proposed use of a building or facility that will either (a) result in a change in its basic prior use or (b) significantly changes its size.
- Research and technology whose anticipated and future application could be expected to have an effect on the environment.
- Implementation of a new program involving the use of chemicals other than chemicals that are (a) purchased as an incidental component of a funded activity and (b) traditionally used, for example, in office, household, recreational, or educational environments.

Consequently, the subject federal action meets the criteria for a categorical exclusion as contained in paragraph 4. (b) in Part 61 of the Code of Federal Regulations (adopted by OVW at 28 CFR § 0.122 (b)).

ACCOMMODATIONS AND LANGUAGE ACCESS

Programs are encouraged to support activities that ensure individuals with disabilities and Deaf individuals and persons with limited English proficiency have meaningful and full access to their programs. For example, grant funds can be used to support American Sign Language (ASL) interpreter services, language interpretations and translation services, or the purchase of adaptive equipment. Programs using grant funds to create websites, videos, and other materials must ensure that they are accessible to person with disabilities.

PREVENTION EDUCATION AND SCHOOLS

The enumerated statutory program purpose areas for STOP VAWA do not address prevention programs. Prevention programs, such as media campaigns, may not be supported under this program, however, outreach efforts aimed at informing a specific group of people about services available can be supported with S*T*O*P funds. Such efforts would be part of "developing, enlarging, or strengthening victim service programs."

Grantees must comply with the OVW special conditions related to prevention education and schools. These conditions clarify the activities that are allowable and those that are prohibited with STOP funds related to schools and to outreach.

Prohibition on Curriculum Development

Grant funds will not be used to support the development or presentation of a domestic violence, sexual assault, dating violence and/or stalking curriculum for primary or secondary schools. The subgrantee further agrees that grant funds will not be used to teach primary or secondary school students from an already existing curriculum.

The "curriculum" under this condition refers to a prevention or education curriculum. Grantees may conduct interventions in schools and can support outreach about available services. For example, a subgrantee could conduct dating

violence support groups in schools, as this would constitute an intervention.

Prohibition on Public Awareness or Community Education

Grant funds will not be used to conduct public awareness or community education campaigns or related activities. Grant funds may be used to support, inform, and outreach to victims about available services.

STOP funds cannot be used for prevention and awareness activities in schools or in the greater community.

Grantees should carefully note the potential scope of presentations under the umbrella of “outreach about available services.” For example, teens may not know what an abusive relationship is, so they would not be able to access the services without some education to help them understand why they would need the services in the first place as well as what services are available. However, education on topics such as healthy versus unhealthy relationships would cross the line into prevention rather than access to services.

CVSD AWARD CONDITIONS

DEMONSTRATES ACCESS TO EFFECTIVE SERVICES

To ensure meaningful access to services for all victims of domestic violence and sexual assault across the State, programs must be able to appropriately respond to requests for assistance (e.g. crisis intervention, safety planning, information and referral, etc.). In addition, programs must be able to directly link victims whose needs may be beyond their expertise to the appropriate community partner agency.

MAINTAINS GOOD FISCAL MANAGEMENT

Agencies will be able to maintain adequate funding, expend funds according to submitted budgets, keep financial records and comply with grant reporting requirements. Agencies with deficiencies in any of the aforementioned good fiscal practices may receive conditional grants

and be required to submit additional information addressing those deficiencies before a grant is awarded. See *Conditional Awards* section for additional information.

MAINTAINS ADEQUATE INSURANCE COVERAGES

Nonprofit Agencies

Nonprofit agencies must obtain and maintain in full force the types of insurance outlined below throughout the duration and all warranty periods of an award period. Agencies must obtain the insurance from insurance companies or entities that are authorized to transact the business of insurance and issue coverage in the State of Oregon and that are acceptable to DOJ CVSD. Agencies must require and ensure that each of its subcontractors complies with these same insurance requirements.

Agencies cannot cancel, make a material change, make a reduction of limits, or not renew insurance coverage(s) without 30 days prior written notice to DOJ CVSD.

- **Workers’ Compensation.** All employers that employ subject workers as defined in ORS 656.027, must comply with ORS 656.017 and provide workers' compensation insurance coverage for those workers, unless the agency or the subcontractor meets the requirement for an exemption under ORS 656.126(2).
- **Comprehensive or Commercial General Liability Insurance.** Agencies must have comprehensive or commercial general liability insurance covering personal injury and property damage arising from the conduct and implementation of a VAWA- or SASP-funded Project.
- **Automobile Liability Insurance.** If in the conduct and implementation of a VAWA- or SASP-funded Project, an agency provides transportation for and/or transports individuals in automobiles, the agency must have automobile liability insurance, including coverage for owned, hired or non-owned vehicles, as applicable.

- **Professional Liability Insurance.** If in the conduct and implementation of the Project, Grantee provides professional advice or services, Grantee shall obtain and maintain professional liability insurance covering any damages caused by an error, omission or any negligent acts related to the performance of any professional services to be provided under a Grant Agreement.

Intergovernmental Agencies

Intergovernmental agencies must require and ensure that each of its subcontractors complies with the insurance requirements stipulated in the Subcontractor Insurance Requirements which is included as an Exhibit in the Intergovernmental Grant Agreement.

COMPLIES WITH FINANCIAL, DATA AND OUTCOME REPORTING

All agencies must comply with the Federal and CVSD reporting requirements including the timely submission of quarterly financial, common outcome measures and semi-annual narrative and statistical reports. See the Quarterly Financial Report Requirements and the Progress Report Requirements sections for a complete description of reporting requirements.

SERVICES PROVIDED ARE CULTURALLY COMPETENT AND ACCESSIBLE

Applicants will provide services that are culturally competent and accessible to the populations in their communities. Applicants will continue or begin an assessment and planning process to identify and prioritize community needs and agency responses. Cultural Competency Standards distributed by DOJ CVSD are a resource for this planning process.

COMPLIES WITH TRAINING REQUIREMENTS

All agencies receiving VAWA and SASP funds shall comply with the training requirements for VAWA- or SASP-funded staff. Domestic violence and sexual assault providers shall make provisions to attend a training that utilizes the Department of Human Service's domestic violence and sexual assault training

requirements. Training shall be complete within the grant cycle.

CONDITIONAL AWARDS

All grant awards are made conditional upon the timely completion of grant award documents. Funds are not considered obligated and will not be transferred until all required grant award documents have been signed by an applicant and by the Department designee. If grant award documents are not completed by an applicant within three months of the notice to the applicant of the intended award, DOJ CVSD has the authority to reallocate the funds awarded.

In addition, an award may be made conditionally if the grantee is not current in reporting for any previous grant award; has fewer than two full years of operational history in providing services to victims of domestic violence and sexual assault; has not fully demonstrated the ability to successfully manage any previous Fund awards; has not demonstrated at least two prior years of program stability²; or when other circumstances exist that require a further showing of applicant's ability to successfully manage an award.

If one or more of these conditions exist, the applicant will be notified by DOJ CVSD that a conditional award has been issued. The award shall specify the conditions to be satisfied by the applicant and the date by which the conditions must be satisfied. Applicants who do not satisfy conditions of funding by the date specified will be contacted by their grant monitor to discuss next steps

FAILURE TO COMMENCE PROGRAM

If a program is not operational within 60 days of the award period start date, the grantee must report to CVSD the steps it has taken to initiate the program, the reasons for the delay, and the

² Definition of Program Stability for DOJ CVSD Grantees

As used in the above section, a demonstration of program stability for CVSD funded applicants must include:

- a. An applicant's history of providing cost-effective direct services to victims of domestic violence and/or sexual assault;
- b. A clear indication of support for applicant's services from one or more community agencies or organizations familiar with the needs of victims to be served, as well as the caliber of services provided by the applicant.

expected starting date. If the program is not operational within 90 days of the award period start date, CVSD may cancel the grant.

SASP AWARD CONDITIONS

Not Charge Survivors for SASP-Funded Services. Programs must provide services to survivors of sexual assault, at no charge, through the SASP-funded project.

Assist Survivors in Seeking Crime Victim Compensation Benefits. Such assistance may include identifying and notifying crime victims of the availability of compensation, assisting them with application forms and procedures, obtaining necessary documentation, and/or checking on claim status.

Promote Community Efforts to Aid Survivors of Sexual Assault. Promote, within the community, coordinated public and private efforts to survivors of sexual assault. Coordination may include, but is not limited to, serving on state, federal, local, or Tribal task forces, commissions, working groups, coalitions, and/or multi-disciplinary teams. Coordination efforts also include developing written agreements that contribute to better and more comprehensive services to survivors of sexual assault. Coordination efforts qualify an organization to receive SASP funds, but are not activities that can be supported with SASP funds (although the time of SASP-funded staff to attend a SART or other sexual assault-related inter-agency response team meeting can be supported with SASP funds).

Not Compromise Survivor Safety and Recovery. Programs must not compromise survivor safety and recovery through any of their activities. Such activities include, but are not limited to:

- Developing procedures or policies that exclude victims from receiving safe shelter, advocacy services, counseling, and other assistance based on their actual or perceived age, immigration status, race, religion, sexual orientation, gender identity, mental health condition, physical health condition, criminal record, work in the sex industry, or the age and/or gender of their children;

- Crafting policies that deny individuals access to services based on their relationship to the perpetrator;
- Developing materials that are not tailored to the dynamics of sexual assault or to the culturally-specific population served;
- Crafting policies or engaging in practices that impose restrictive conditions to be met by the survivor in order to receive services; and
- Crafting policies that require the victim to report the assault to law enforcement.

Lead Sexual Assault Worker. It is required that any program receiving SASP funding must designate a lead worker to act as a contact to receive and disseminate sexual assault information within the organization and to community partners, as possible.

Training Requirement. Programs must demonstrate that any staff person approached by a sexual assault survivor should be able to respond appropriately to assess need, provide crisis intervention and information and referral; as appropriate, staff may pass longer-term needs and services to the SASP-funded staff.

CVSD requires of a minimum of 30 hours of content-specific training for crisis line response and an additional 10 hours of training for in-person response for all grant-funded staff and volunteers serving survivors of domestic violence and sexual assault. Refer to CVSD website for a detailed outline of the training requirements:

http://www.doi.state.or.us/victims/pdf/dvsa_training_requirements.pdf. In addition, to qualify for SASP funding, each staff person wholly or partially funded by SASP **must attend at least 24 hours of advanced sexual assault training within the last 24 months.**

24 hours of advanced sexual assault training within the last 24 months.

Training resources:

- Training - Sexual Assault Training Institute (SATI) of the Attorney General's Sexual Assault Task Force (AGSATF);
- Training - Oregon Council Against Domestic and Sexual Violence (OCADSV);
- Webinars offered by the National Crime Prevention Council:
<http://www.ncpc.org/training/training-topics/national-training-and-technical-assistance-partnerships/new-podcast-interviews>;

- Webinars - Office for Victims of Crime : <http://ovc.ncjrs.gov/ovcproviderforum/asp/calendar.asp>;
- Webinars - Battered Women's Justice Project: http://www.bwjp.org/bwjp_home.aspx
- Webinars - National Family Justice Alliance: <http://www.familyjusticecenter.org/index.php/training-main/training-overview/webinars.html>
- Webinars and online courses - End Violence Against Women International: <http://olti.evawintl.org/Courses.aspx>
- Seminar - National Institute of Justice: <http://nij.gov/multimedia/presenter/presenter-campbell/Pages/welcome.aspx>
- Webinars - Center for Survivor Agency & Justice: <http://csaj.org/webinars>
- Webinars - National Sexual Violence in Detention Education and Resource Project: <http://www.justdetention.org/en/advocate-resources.aspx>
- Webinars and TA on working with transgender/ gender non-conforming populations: <http://forge-forward.org/anti-violence/for-professionals/>
- Webinars and TA on working with incarcerated survivors: <http://www.prearesourcecenter.org/training-and-technical-assistance/archived-webinars>
- Training and events on working with Latina populations: <http://www.nationallatinonetwork.org/training-and-events/upcoming-training>
- OHSU, Center for Diversity & Inclusion <http://www.ohsu.edu/xd/about/vision/center-for-diversity-inclusion/>
- Institutes and conferences:
 - The Trauma Stewardship Institute
 - Child Abuse and Family Violence Summit
 - Tribal Sexual Assault Advocacy Skills Training
 - LGBTQ Meaningful Care Conference
 - Southern Oregon Sexual Assault Symposium
 - National Training Institute on Protection Order Practice

SUSPENSION OR TERMINATION OF FUNDING

CVSD may suspend funding in whole or in part, terminate funding, or impose another sanction on a VAWA or SASP subrecipient for any of the following reasons:

- Grantee fails to comply substantially with the requirements or statutory objectives of the Violence Against Women Act of 1994, P.L. 103-322, the Violence Against Women Act of 2000, P.L. 106-386, the Omnibus Crime Control and Safe Streets Act of 1968, as amended, Title I, 42 U.S.C. 3711 et seq., the Violence Against Women and Department of Justice Reauthorization Act of 2005, P.L. 109-162, and OVW's implementing regulations at 28 CFR Part 90 guidelines issued thereunder, or other provisions of federal law.
- Grantee fails to make satisfactory progress toward the goals and objectives set forth in the application.
- Grantee fails to adhere to the requirements and the terms and conditions of the grant award.
- Grantee proposes or implements substantial plan changes to the extent that, if originally submitted, the application would not have been selected or approved.
- Grantee fails to submit the required financial, or program reports, or to resolve financial, program, or audit issues.
- Grantee institutes or has instituted against it insolvency, receivership, or bankruptcy proceedings, makes an assignment for the benefit of creditors, or ceases doing business on a regular basis.
- Grantee fails to comply substantially with any other applicable federal or state statute, regulation, or guideline.

Before imposing sanctions, CVSD will provide reasonable notice to the grantee of its intent to impose sanctions and will attempt to resolve the problem informally.

FISCAL REQUIREMENTS

FINANCIAL GUIDE

The OVW *Financial Grants Management Guide* serves as a primary reference manual to assist grantees in fulfilling their fiduciary responsibility to safeguard grant funds and ensure funds are used for the purposes for which they were awarded. The Guide should serve as a day-to-day management tool for grantees in administering their grant programs. It is the responsibility of grantees to comply with the federal guidelines in the manual. Copies of the *OVW Financial Grants Management Guide* is available at:

<http://www.ovw.usdoj.gov/docs/ovw-fmg.pdf>

OMB CIRCULARS

It is the responsibility of the recipient agency to comply with the federal guidelines contained in the appropriately relevant Circulars. Copies of the following Office of Management and Budget (OMB) may be obtained from the addresses shown below.

The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503
www.whitehouse.gov/omb/circulars/

2 CFR Part 220 formerly known as OMB Circular A-21: “*Cost Principles for Educational Institutions.*” This Circular establishes principles and standards for determining costs applicable to grants and contracts with educational institutions.

2 CFR Part 225 formerly known as OMB Circular A-87: “*Cost Principles for State, Local and Indian Tribal Governments.*” This Circular establishes principles and standards for determining costs applicable to grants and contracts with state, local and Indian tribal units of government.

OMB Circular A-102: “*Grants and Cooperative Agreements with State and Local Governments.*” This Circular establishes standards for administration of grants with state and local government agencies.

2 CFR Part 215 formerly known as OMB Circular A-110: “*Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Nonprofit Organizations.*” This Circular establishes standards for the administration of grants to institutions of higher education, hospitals, and other nonprofit organizations.

2 CFR Part 230 formerly known as OMB Circular A-122: “*Cost Principles for Nonprofit Organizations.*” This Circular establishes principles for determining costs of grants, contracts, and other agreements with nonprofit organizations.

OMB Circular A-133: “*Audits of States, Local Governments, and Nonprofit Organizations.*” This Circular covers audit requirements for states, local governments, and nonprofit institutions.

Common Rules: “*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, 28 CFR Part 66.*” This Common Rule contains government-wide fiscal and administrative conditions governing federal grants and cooperative agreements and sub awards to state, local, and Indian tribal governments.

Units of government and other organizations receiving federal financial assistance from the State shall adhere to applicable State laws and procedures.

Grantees shall also adhere to any fiscal procedures established by DOJ/CVSD.

MEMORANDUM OF UNDERSTANDING (MOU)

In some instances, a grantee may be required to, or may choose to, execute a Memorandum of Understanding (MOU). An MOU is a written plan between two or more parties for carrying their separate activities in a coordinated and mutually beneficial manner. An MOU is generally used when there will not be an exchange of funding or resources but there is a need to formally document the relationship(s). An MOU generally has the following components:

- Parties of the MOU
- Background and Purpose
- General Responsibilities of all Parties
- Specific Roles and Responsibilities of Each Party
- Additional Terms and Conditions (conflict resolution, amendments, termination, etc.)
- Duration of the MOU
- Acceptance and Authorized Signatures

SUBAWARDS

In some instances, a grantee may choose to accomplish a portion of the program activities through a financial arrangement with another organization. A number of factors must be considered to determine whether a financial arrangement should be classified as a subaward or a procurement transaction. The proper classification of a financial arrangement as a subaward or a procurement transaction at the time it is proposed is critical to ensure proper accounting for costs and compliance requirements.

The requirements found in [OMB Circular A-133](#), Section B.210 provide the following guidance to distinguish between a subaward or a procurement transaction:

Subaward Factors	Procurement Factors
Distributes financial assistance in the form of money or property to eligible subrecipients.	Provides the goods or services within its normal business operations.
Performance is measured against the objectives of the federal award.	Provides similar goods or services to many different purchasers.

Subaward Factors	Procurement Factors
Has responsibility for programmatic decision making.	Operates in a competitive environment.
Has responsibility to comply with applicable federal program requirements.	Not subject to the compliance requirements of the federal program.
Uses the federal funds to carry out its own program, as compared to providing goods or services for the program of the grantee.	Provides goods or services that are ancillary to the operation of the federal program.

Typical subaward situations include financial arrangements in which two or more qualifying legal entities are working collaboratively on a program. Each entity has its own program director; however, one of the collaborating entities takes on the role of the prime grantee. A collaborating entity is responsible for meeting its own scope of work, for directing its segment of the program, and for complying with the pertinent OMB Circulars.

None of the program activities supported by VAWA and/or SASP funds may be subawarded to another organization without specific prior approval from DOJ/CVSD. Where the intention to make subawards is made known at the time of application, the approval may be considered given, if these activities are funded as proposed.

PROCUREMENT STANDARDS

If a proposed financial arrangement does not meet the criteria for a subaward, the grantee must initiate a procurement transaction. Federal requirements state that “all procurement transactions shall be conducted in a manner to provide, to the maximum extent practical, open and free competition.” These requirements apply to all procurements, including, but not limited to, procurements for goods, services, and equipment. Grantees shall follow their own established procurement procedures and regulations, provided they minimally adhere to applicable federal and state guidelines and standards. If a grantee’s established procurement procedures are less competitive than the federal requirements, the grantee must adhere to the following more competitive procurement requirements:

- For small procurements of \$5,000 or less, grantees may solicit goods or services in any manner deemed practical or convenient. A procurement may not be artificially divided or fragmented so as to constitute a small procurement.
- For procurements exceeding \$5,000 but not exceeding \$100,000, grantees must solicit quotes or bids from at least three sources.
- For procurements over \$100,000, grantees must formally advertise the proposed procurement through an Invitation for Bids (IFB) or a Request for Proposals (RFP) process.

Grantees must follow the threshold limitations established in their own procurement procedures if their internal procedures are more restrictive than the federal threshold.

Grantees must submit all IFBs and RFPs over \$100,000 that involve the use of federal or matching funds to DOJ/CVSD for review and approval prior to their issuance. Interagency agreements between units of government are excluded from this provision.

Grantees must submit documentation regarding its procurement procedures to DOJ/CVSD for review and approval to assure adherence to applicable federal guidelines.

SOLE SOURCE PROCUREMENT

In rare and unusual circumstances it may be necessary to waive the competitive bid process and utilize a sole source, noncompetitive, procurement. Grantees may make the determination that competition is not feasible if one of the following circumstances exists:

- The item or service is available only from a single source.
- A public exigency or emergency will not permit a delay resulting from a competitive solicitation; or if it can be shown unequivocally that desired time frames for delivery must be met or the entire program will suffer as a direct result of the delay.

- After solicitation of a number of sources, competition is considered inadequate.

If sole source procurement is pursued, documentation reflecting actions taken and the position of the grantee is required.

A justification statement for all sole source contracting should include:

- A brief description of the program, the amount to be designated for the sole source procurement, and the purpose of the contract.
- Explanation of why it is necessary to contract in a noncompetitive manner by providing supporting information as identified below in the applicable section(s):
 - If the item or service is available only from one source, describe the contractor's expertise related to the current program (knowledge of program management, responsiveness, knowledge of the program, experience of contractor personnel), the uniqueness of items to be procured from the contractor (these services or items are only available from a single contractor), and any additional information that would support the case.
 - If a public exigency or emergency will not permit a delay resulting from a competitive solicitation, describe when the contractual coverage is required, the impact on the program if deadline dates are not met, how long it would take an alternate contractor to reach the same level of competence, and any additional information that would support the case.
 - If competition is determined inadequate after solicitation of a number of sources, describe the market survey, or similar effort, used to determine competition availability, and any additional information that would support the case.
- A declaration that this action is in the "best interest" of the agency.

For all sole source procurements in excess of \$100,000, grantees must submit a justification statement for review and approval from DOJ/CVSD prior to the procurement.

Interagency agreements between units of government are excluded from this provision.

SUBCONTRACTOR AGREEMENTS

All financial arrangements with other entities or individuals to accomplish a portion of the program activities, subawards and procurement transactions, must be formalized in written and signed agreements between the parties involved.

All subcontractor agreements must be submitted to DOJ/CVSD when fully executed. No subcontractor payments will be issued if a subcontractor agreement has not been received by DOJ/CVSD.

An agreement must, at a minimum, include:

- Activities to be performed;
- Budget;
- Program start date and end date;
- All required representations, certifications, and assurances;
- Program policies and procedures to be followed;
- Dollar limitation of the award or contract and any match requirements;
- Payment procedure and schedule; and
- Cost principles to be used in determining allowable costs.

The written agreement may not affect the grantee's overall responsibility for the duration of the VAWA-funded program and accountability to DOJ/CVSD. The grantee is responsible for monitoring the subcontractor and determining that all fiscal and programmatic responsibilities are fulfilled.

PROGRAM INCOME

Definition of Program Income

Program income means gross income received by the grantee or subgrantee directly generated by a grant supported activity, or earned only as a result of the grant agreement during the grant period. "During the grant period" is the time between the effective date of the award and the

ending date of the award reflected in the final Quarterly Financial Report (QFR).

Examples of program income include, but are not limited to, income from fees for services performed, registration fees, usage or rental fees from real or personal property acquired with grant funds, sales of commodities or items fabricated under a grant, sale of property, royalties, attorney's fees and costs, and proceeds received through asset seizure and forfeiture.

Unless specifically identified in the grant agreement, program income does *not* include interest on grant funds; rebates, credits, discounts, and refunds; or taxes, special assessments, levies, fines, and other such revenues raised by a grantee or subgrantee. Fines as a result of law enforcement activities are not considered program income.

If you encounter a situation in which program income may be generated please contact your CVSD Fund Coordinator.

QUARTERLY FINANCIAL REPORT REQUIREMENTS

CVSD reimburses only actual and allowable expenditures for goods and services purchased during the grant period.

Grantees may not obligate funds, order goods, enter into contracts, or request purchase orders prior to the start of the grant period.

CVSD does not typically reimburse items that are not in the approved budget. CVSD may withhold funds for any expenditure not budgeted or in excess of approved budget amounts.

CVSD reimburses expenses quarterly unless otherwise agreed between CVSD and the grantee.

Failure of the grantee to operate the program in accordance with the approved budget may result in suspension and/or termination of the grant agreement.

QUARTERLY FINANCIAL REPORT (QFR)

CVSD requires accurate and clear expenditures that follow the approved budget prior to reimbursement. CVSD operates funding for the VAWA and SASP Grant Programs on a reimbursement basis, meaning that grant funds are paid to grantee agencies after expenditures have been made. Payments to grantees are made when CVSD receives a Quarterly Financial Report (QFR). The QFRs must be accompanied by the required quarterly reports (see Progress Report Requirements).

IMPORTANT INFORMATION REGARDING PAYMENTS

- QFRs submitted without the accompanying required quarterly and/or semi-annual reports will not be processed for reimbursement until all reports have been submitted and reviewed.
- It is the responsibility of the grantee to respond to all requests for edits or information made by DOJ CVSD grant unit

staff in a timely manner. Failure to comply will delay payment.

- Grantees may not obligate funds, order goods, enter into contracts, or request purchase orders prior to the start of the grant period.
- Reimbursement payments can be processed as quickly as two weeks or take up to one month.
- QFRs may be submitted in E-Grants by organization members with the role of Authorized Official, Agency Administrator, or Financial Officer. It is the responsibility of the grantee agency to ensure that only those organization members authorized to submit a QFR do so.
- Grantees must maintain supporting documentation for each QFR submitted.

OTHER IMPORTANT NOTES ABOUT QFRS:

Expenditures

- Expenditures should be reported for actual approved and incurred expenses, as opposed to dividing the total amount of the grant into equal requests for reimbursement for the length of the grant. While this is a convenient method of requesting payment it may not necessarily accurately represent the expenditures charged to a grant.
- **All expenditures must coincide with the current approved budget submitted**, which will be one of the following:
 - the original budget submitted with the grant application through E-Grants;
 - an amended budget submitted through E-Grants;
- CVSD reimburses expenses quarterly unless otherwise agreed between CVSD and the grantee.
- Expenditures must be reported in the quarter in which the expenses were incurred.
- CVSD reimburses only **actual** and allowable expenditures for goods and services purchased during the grant period.
- CVSD does not reimburse items that are not in the approved budget. CVSD may withhold funds for any expenditure not budgeted or in excess of approved budget amounts.
- Failure of the grantee to operate the program in accordance with the approved budget may

result in suspension and/or termination of the grant agreement.

- CVSD will hold a grantee accountable for any overpayment, audit disallowances, or any other breach of grant agreement that results in a debt owed to the federal government.

CVSD E-Grant: QFR

The E-Grant QFR will show *page errors* if any of the following is entered:

- Total costs in the Personnel category (Salary + Personnel Expenses) in excess of the budgeted amount for the Personnel category.
- Unbudgeted costs totaling more than \$500 in the Services and Supplies and Other Costs categories.
- Costs in any unbudgeted subcategory.
- No match was entered and no explanation was provided, as appropriate.

All requests for budget changes must be made prior to expending any funds.

It is the responsibility of the grantees to adhere to the approved budget as referenced in the grant agreement, or to request a budget amendment. The main point to remember is that at no time may a budget modification change the scope of the original grant agreement.

Attachments

Copies of check stubs, timesheets, accounts, ledgers, or other supporting documentation should NOT be submitted with the QFRs. The documentation must be separated by each budget category with the amounts clearly identified. These records will be verified during a programmatic and financial site visit.

Unliquidated Obligations (Cash or Accrual Basis)

Agencies may complete QFRs based on either accrual or cash principles. Cash basis is the method of reporting revenues and expenses when cash is actually received or paid out. Accrual basis is the method of recording revenues in the period in which they are earned, regardless of when cash is received, and reporting expenses in the period when the

charges are incurred, regardless of when payment is made.

On occasion, agencies may incur obligations or encumber funds toward the end of a grant period for which payment cannot be made until after the grant period has ended. In such cases, agencies should only report the actual expenditures paid during the reporting period. Obligations made prior to the end of the grant period, but not yet paid, must be reported on a separate statement which details the encumbered, but unpaid, obligations charged to that grant award. Agencies will then have an additional 30 days to pay those obligations and report the expenditure on a final QFR. CVSD E-Grants allows the grantee to submit an additional final QFR to accommodate for this should it occur.

In most instances, these types of unliquidated obligations will be due to accrued payroll expenses or, on rare occasions, an approved operating expense item, which had been ordered by the end of the grant period but not yet paid. This procedure may not be used to retroactively charge off previously unreported expenses in order to fully expend the VAWA or SASP grant award.

Final (Closeout) QFR

Agencies have 30 days after the end of the last or final reporting period for any VAWA or SASP grant to report expenses, request reimbursement and reconcile any discrepancies. If a grantee determines that VAWA or SASP funds will not be spent by the end of the grant period, a request for an extension must be submitted prior to the end of the grant period; otherwise, funds will be automatically deobligated and will no longer be available to the grantee. See Requests for Amendments section for further information on redirects and extensions.

DUE DATES

Grantees must submit a Quarterly Financial Report (QFR) unless otherwise agreed. It is the responsibility of the grantee to ensure that QFRs are received by CVSD by the due dates. For most VAWA and SASP programs the reports are due on the following dates:

Quarter	Due Date
July 1 - September 30	October 31
October 1 - December 31	January 31
January 1 - March 31	April 30
April 1 - June 30	July 20

A final QFR must be received within 30 days of the expiration of the grant period.
CVSD may de-obligate funds at any time during the grant period and will de-obligate all unspent funds at the close of the grant period.

REIMBURSABLE EXPENSE CATEGORIES (Allowable Costs)

PERSONNEL costs are the cost of employees, fringe benefits, and payroll taxes. Overtime must be specifically listed and approved in the budget in order to be reimbursed. Reimbursement for taxes and benefits for overtime cannot include fixed monthly costs that do not increase with overtime pay; this generally pertains to health care benefits, but may include other taxes and benefits.

Documentation has to be retained on site with the QFR and must include copies of actual payroll reports showing the full amount paid for each employee (wages, taxes, and benefits) as well as a calculation to show how the amount reported was determined and signed Personnel Activity Reports (time sheets). If the employee works less than the 1.0 FTE on the VAWA or SASP funded program, the Personnel Activity Report must reflect an after-the-fact distribution of the employee's actual time on the program and must also account for the total time for which the employee is compensated.

The Personnel Activity Report (time sheet) must provide a breakdown of the total time for which the employee is compensated. This includes the actual time spent on the VAWA or SASP program (grant and/or match) and any other federal programs.

One example of documentation that satisfies the requirement for the Personnel Activity Report may include time sheets with a separate breakdown for each program. The employee should indicate on the time sheet how much time was spent each day on each of the different programs. If the requirement for submitting Personnel Activity Reports can be met within the recipient's current management system, there is no need to establish a separate time tracking system. *Volunteer hours used for match must be tracked and approved in a similar manner.*

EQUIPMENT is tangible personal property costing over \$5,000 and having a useful life of more than one year. Equipment must be purchased from a governmental price list or through an open competitive process.

Examples of items typically considered to have a useful life of more than one year and therefore included in the equipment category:

- Computers and printers
- Office furniture

Equipment may not be transferred, sold, or disposed of during the grant period without the permission of CVSD. After the end of the grant period, items with a current per unit fair market value of less than \$5,000 may be retained by the grantee for purposes consistent with the VAWA or SASP authorized Purpose Areas, sold, or otherwise disposed of, in accordance with state procedures, with no further obligation to CVSD.

TRAVEL/CONFERENCES/TRAINING include employee costs for meals, tolls, lodging, mileage, motor pool fees, commercial transportation, parking fees, registration fees, and material fees.

Travel costs are allowable as expenses by employees who are in travel status on official program-related business. These costs must be in accordance with federal, state, or grantee-approved travel policy. CVSD follows federal travel rules as posted by the U.S. General Services Administration in determining allowable grant and match expenditures. If a grantee does not have a written travel policy, the grantee must abide by the federal travel policy. The current Federal Travel Regulation, per diem rate information, and privately owned vehicle (POV) mileage reimbursement rates are available at the GSA Web site www.gsa.gov.

Grantees must obtain prior CVSD approval for travel out-of-state. CVSD will approve out-of-state travel only if the travel is essential to meet the objectives of the program.

CVSD requires that a state travel form or a form similar to the state travel form be included with the QFR and retained as documentation on site. A blank copy of the state travel reimbursement form, in Excel format, is available online at: <http://www.oregon.gov/DAS/SCD/SARS/policies/oam/75.40.01.FO.xls>.

Allowable costs for conferences and training may include conference or training arrangements, publicity, registration fees, conference or training space, transportation and per diem for speakers or participants, lodging, and food and beverages subject to specific conditions cited under the Food and Beverage section.

The documentation must show the nature of the conference (i.e. title, subject) and identify the individuals for whom reimbursement is requested. The subject matter of the conference must be directly related to the VAWA or SASP program objectives. The number of individuals attending the conference should be reasonable and essential to the operation of the program. A copy of the conference agenda or brochure and conference registration forms must accompany the QFR.

Overnight lodging while attending a conference, meeting, or training should not exceed the federal lodging rates. Any lodging costs above the federal rate will not be automatically approved and reimbursed. This may result in all costs being disallowed.

Meals may not be claimed as a reimbursable expense if they are already included as part of the conference or training registration fee. Employees may receive the meal allowance under the following circumstances:

- An employee is in transit to or from a destination that requires an overnight stay.
- An employee is in transit to or from a destination and the employee must depart from the employee's home more than two hours before the regular starting time or returns home more than two hours after the regularly scheduled end of shift.

FOOD AND BEVERAGE

No VAWA and SASP funds can be used to purchase food and/or beverages for any meeting, conference, training, or other event. The only exceptions to this restriction are stated below:

- The location of the event is not in close proximity to food establishments.

- It should be a priority to try to secure a location near reasonably priced and accessible commercial food establishments;
- If not serving food will significantly lengthen the day or necessitate extending the meeting to achieve meeting outcomes;
- A special presentation at a conference requires a plenary address where there is no other time for sustenance to be attained; and
- Other extenuating circumstances which necessitate the provision of food.
- These food and beverage restrictions do not apply to:
 - Water provided at NO cost (the restriction does apply to any and all other refreshments, regardless of the size or nature of the meeting or event); and
 - Direct payment of per diem amounts to individuals in a travel status under your organization's travel policy.
- Any exceptions to the purchase of food and/or beverages for any meeting, conference, training, or other event due to the circumstances outlined above require prior approval from CVSD. If an exception is approved by CVSD, the following restrictions will apply:
 - Only one refreshment break a day is allowable and grantees are strongly advised to eliminate all refreshment breaks and breakfast;
 - The cost of a refreshment break may not exceed 11.5% of the General Services Administration (GSA) Meals and Incidental Expenses (M&IE) rate for the locality; and
 - Any meal provided must stay at or below 150% of the applicable per diem rate, including any hotel service costs. Grantees are strongly encouraged to stay at or below 100% of the applicable per diem rate.

Grantees are subject to monitoring of adherence to the food and beverage policy. Grantees should maintain all necessary documentation to support any conference costs, or food and beverage expenses if prior approval granted by

CVSD. Grantees are encouraged to identify alternative training methods, such as webinars and teleconferences, to acquire lower cost locations and venues, and to avoid the appearance of extravagant spending.

SUPPLIES are items that have a useful life of less than one year such as office supplies. Supplies that have a useful life of more than one year and have a value greater than \$5,000 are considered Equipment.

Examples of items typically considered to have a useful life of less than one year and therefore included in the Supplies category:

- Office supplies
- Educational/training supplies
- Printer supplies
- Duplication and printing
- Postage and freight
- Software and computer supplies (modem, wireless card, flash drive, etc.)

CONTRACTUAL SERVICES are services such as consulting, evaluation, treatment, or other grant-supported activities provided through subawards, subcontracts, or independent contractors rather than employees. Grantees must follow subaward guidelines and procurement standards described on page 20 in the *Handbook* when awarding contracts. Federal rules limit compensation for individual consultants to \$450 per 8-hour day (\$56.25 per hour), plus expenses. An 8-hour day may include preparation, evaluation, and travel time in addition to the time required for actual performance of the contracted service. When the rate exceeds \$450, prior approval is required from USDOJ. Grantees must submit the following levels of justification:

- If the hourly rate exceeds \$56.25 per hour, but is less than \$100 per hour, provide a signed certification from the consultant stating that the hourly rate charged to the program is equal to or less than the rate that the consultant currently charges to other organizations for similar services. Absent such certification, a compelling justification as to why the consultant should be paid at the requested rate must be provided.

- If the requested hourly rate is \$100 an hour or more, provide a copy of a former contract, invoice, or similar documentation showing that the consultant has been previously paid at the requested rate for similar services. Absent such certification, a compelling justification as to why the consultant should be paid at the requested rate must be provided.

If consultants are hired through a competitive bidding process, not sole source, the \$450 threshold does not apply.

The documentation submitted under contractual services must clearly identify the name of the contractor, the service provided, time period of service provided, and the amount and basis of amount paid to the contractor. The requirements in this *Handbook* relating to expenditures are applicable to contractors as well as grantees.

Grantees must submit a copy of the subcontractor agreement with the first QFR of contractual services (unless submitted with the original application); a copy of the QFR must also be submitted if contracted services exceed \$100,000. The agreement should meet the criteria stipulated in the Subcontractor Agreements section of the *Handbook*. The QFR for contractual services should conform to the dollar limitation, match requirements, payment procedure, and payment schedule outlined in the agreement.

RENT AND UTILITIES includes rent, telephone, cellular phones/pagers, and other utilities. Maintenance and operation costs are allowable unless duplicated in rent or extend beyond the life of the award. The documentation included with the QFR on site should identify each location for which rent is paid and the basis for the amount requested. The basis for determining the rent cost should include a calculation of the cost per square foot, and a justification of the total program-supported square footage (FTE, actual utilization, etc.).

ADMINISTRATIVE COSTS Typical administrative costs include the costs of operating and maintaining facilities, equipment, and grounds; depreciation or use allowances; and administrative salaries and supplies. A fixed percentage of administrative costs may be

charged the SASP- and VAWA-funded projects as long as the agency has a Cost Allocation Plan (CAP). Although there are different methodologies for allocating costs, applicants must have a system in place to equitably distribute costs to all programs. Additionally, time distribution records must reflect an after-the-fact determination of the actual activity of each employee. Consideration in determining an appropriate base for allocating costs include the relative benefits received, the materiality of the cost, and the amount of time and cost to perform the allocation. If the an agency does not have a CAP, there are resources available on the Internet to assist in the development of an acceptable CAP.

Grantees may use a federally-approved indirect cost rate, but if an agency does not have a negotiated rate, the agency may elect to use a fixed percentage administrative rate up to 10% of total grant funds. Grantees may waive administrative and indirect costs.

INDIRECT COSTS Typical indirect costs include the costs of operating and maintaining facilities, equipment, and grounds; depreciation or use allowances; and administrative salaries and supplies. These costs are usually charged to the grant as a percentage of some or all of the direct cost items in an agency's budget; this budget is called the *indirect cost rate*. An agency must have a current indirect cost negotiated agreement to charge indirect costs to a grant.

Agencies that have a Federally-approved indirect cost agreement may choose to charge their indirect cost rate to a VAWA and SASP grant. Agencies **MUST** provide a current, signed indirect cost negotiated agreement.

If an agency does not have a negotiated rate, an agency can obtain an indirect cost rate by submitting an indirect cost proposal to its cognizant federal agency and negotiating an indirect cost agreement. There are resources available on the Internet to assist in the development of an indirect cost proposal.

OTHER COSTS are expenses that do not readily fit into any of the other budget

categories. Examples of costs that might be included in the Other category:

- Direct client or emergency services
 - Staff recruitment costs
- Documentation (retained on site) for **direct client services**, and any other client-based costs, must clearly indicate an actual expenditure for a client receiving program services.

Examples of direct client services include, but are not limited to, the following:

- Child care
- Bus passes and tickets
- Rent, utilities, telephone bills (as an emergency service for clients only)
- Medical and prescription costs or co-payments (emergency only)

STOP VAWA UNALLOWABLE COSTS

Funds may not be budgeted or used for the following items:

1. Land acquisition.
2. Acquisition or construction of non-penal or correctional buildings.
3. Vehicle (excluding police cruisers), vessels (excluding police boats), aircraft (excluding police aircraft) purchase or rental.
4. Tips, bar charges or related items while on travel status. Meals not associated with overnight travel. An exception is made for breakfast and dinner as long as the employee is on travel status for a minimum of two hours before the beginning of their regularly scheduled work shift or after the end of their regularly scheduled work shift.
5. Per diem reimbursement for meals provided at conferences or training seminars.
6. Food related items such as napkins, plates, forks, spoons, and knives, beverages, snacks, candy or food items not provided in conjunction with a working lunch or dinner at a conference or training event (see page 20 for definition of working lunch or dinner).
7. Entertainment, honoraria, gifts, gift certificates, cards, movies, recreation, sporting events, holiday and birthday supplies, or expenses related to these items.
8. Fund raising campaigns, endowment drives, or solicitation of gifts and bequests.
9. Personal items such as makeovers, non-professional membership dues, flowers, cards, social events or promotion of church attendance.
10. Grantwriting.
11. Visas or passport charges.
12. Compensation to federal employees.
13. Bonuses or commissions.
14. Military-type equipment such as armored vehicles, explosive devices, and other types of hardware excluding automatic weapons.
15. Lobbying or attempts to influence members of Congress, the Oregon Legislature, City Councils, County Commissions, or other legislative bodies.
16. Corporate formation.
17. Interest; interest on non-bearing items, or the cost of money.
18. Laundry charges.
19. Expenses related to the maintenance or sale of forfeited or seized property.
20. Mass transit tax.
21. Late fees or finance charges.
22. Refundable deposits.
23. Audit costs for audits not required in accordance with OMB Circular A-133 are unallowable. If the grantee did not expend \$500,000 or more in federal funds in its fiscal year, but contracted with a certified public accountant to perform an audit, these costs may not be charged to the grant.
24. Support services for obtaining divorces or legal separations.
25. Support services that focus exclusively on children.
26. Develop prevention curricula or to support prevention activities.
27. Acquiring furniture or housing or moving household goods to a new location.
28. Create a voucher program.
29. Support legal or defense services for perpetrators.

CVSD reserves the right to modify the list of unallowable costs as necessary.

SASP UNALLOWABLE COSTS

Funds may not be budgeted or used for the following items:

- Sexual assault forensic examiner projects;
 - Criminal justice-related projects, including law enforcement, prosecution, courts and forensic interviewing;
 - Activities focused on education and prevention efforts (includes bystander intervention, presentations on healthy relationships, etc.);
 - General professional training (law enforcement, mental health professionals, prosecutors, medical professionals, etc.);
 - Development of training curriculum;
 - Coordination of inter-agency response teams or task forces including Child Abuse Response Team, Sexual Assault Response Team, or Multidisciplinary Team, etc. (this does not include the time of a grant-funded advocate to attend a SART or other sexual assault-related inter-agency response team meeting);
- does not include the time of a grant-funded advocate to attend a SART or other sexual assault-related inter-agency response team meeting);

- Research projects (this does not include program assessment conducted only for internal improvement purposes);
- Providing domestic violence services that do not relate to sexual violence;
- Lobbying or attempts to influence members of Congress, the Oregon Legislature, County Commissions, City Councils, or other legislative bodies;
- Fundraising campaigns, endowment drives, or solicitation of gifts and bequests;
- Purchase of real property and vehicles; and
- Construction or physical modification to buildings, including minor renovations (such as painting or carpeting).

CVSD reserves the right to modify the list of unallowable costs as necessary.

Most of the STOP VAWA unallowable costs pertain to SASP with the following exceptions:

- SASP funds may be used to support services for children.
- SASP funds may be used toward first month's rent if the move is related to a sexual assault, including application fees and security deposits.
- SASP funds may be used to provide direct educational information to survivors in a support group setting. Educational presentations and/or training to general audiences (e.g., community organizations, general public, high school students, etc.) is NOT allowed.

CVSD E-GRANTS OVERVIEW

CVSD E-Grants is a comprehensive web-based grant application and reporting system. Using CVSD E-Grants, grantees are now completing grant applications, submitting reports, and requesting grant amendments on-line. CVSD feels that this system provides for a more streamlined application and reporting process for both grantees and CVSD staff. In addition, the system allows us to be mostly paperless, saving both natural resources and shipping costs.

Currently, all STOP VAWA Non-Competitive DV/SA and Competitive subgrantees complete and submit grant applications, reports and grant amendments online through the CVSD E-Grants web based system.

The FY 2014 – 2016 SASP Competitive Application process will require that all subgrantees use the CVSD E-Grants System.

The web address for CVSD E-Grants is: www.cvsdegrants.com.

The CVSD E-Grants Applicant User Guide walks applicants and grantees through many important features of the CVSD E-Grants system. This includes instructions on how to register in the system, add other people to your organization, initiate applications and reports, and submit applications and reports. The User Guide can be found by clicking "My Training Materials" from your CVSD E-Grants Home Page or here:

http://www.cvsdegrants.com/Documentation/OR CVSD/CVSD_E-Grants_Application_and_Reporting_Guide.pdf

Applicants are also encouraged to contact the Agate Help Desk at 1-800-820-1890 or helpdesk@agatesoftware.com, or CVSD staff, for assistance.

PROGRESS REPORT REQUIREMENTS

PURPOSE

Grantees must submit progress reports to CVSD. Progress reports have the following purposes:

- To determine if the grantee is implementing the program as agreed.
- To determine if the grantee is making progress towards meeting its performance measures.
- To determine if the activities performed by the grantee are linked to the specific outcomes of the program.
- To allow the grantee to present information on any problem encountered (e.g., what were they, how they impacted the program, and how were they resolved).
- To develop data for statewide planning.
- To provide/present information to the Oregon Attorney General's Office, the Legislature, the Office on Violence Against Women (OVW) and Congress.
- To help other agencies that might undertake a similar program.
- To justify continued funding of the VAWA or SASP programs.

DUE DATES

Reports should include activities and outcomes, as well as cumulative information to date. For most VAWA or SASP programs, the reports are due on the following dates:

Quarter	Due Date
July 1 - September 30	October 31
October 1 - December 31	January 31
January 1 - March 31	April 30
April 1 - June 30	July 20

In addition to the four quarterly financial reports, two semi-annual narrative reports and the annual progress report are required. VAWA-funded programs may be required to submit additional information for the annual federal report.

FAILURE TO SUBMIT PROGRESS REPORTS

CVSD will not issue financial reimbursements if any progress report is outstanding or incomplete.

Any progress report that is outstanding for more than one month past the due date may cause the suspension and/or termination of the grant.

The grantee must receive prior written approval from CVSD to extend a progress report requirement past its due date. It is the full responsibility of the grantee to ensure that progress reports are received by CVSD by the due date.

SASP PROGRESS REPORTS

Narrative Reporting Requirements

Each grantee must submit a quarterly narrative report on grant-funded activities. Quarterly narrative reports are not a substitute for other specifically required report information (i.e., reporting staff turnover, approval of specific expenditures, etc.).

Statistical Reporting Requirements

CVSD requires that SASP grantees report statistical data on a semi-annual basis. Semi-annual statistics (due each year on July 20) are collected in E-Grants and annual statistics, (due each year on January 31) are collected on the SASP Annual Progress Report form provided by OVW and found at:

http://muskie.usm.maine.edu/vawamei/saspform_ulaform.htm

Grantees must carefully consider who their SASP grant clients are in order to accurately collect and report relevant data. In general, clients are "identifiable individuals who receive

direct services by the staff resources reflected in the SASP grant budget.”

The Annual Progress Report requires programs to report on the number of person served, the number of persons seeking services who could not be served, the number of secondary victims served, the number services provided to primary victims, informational materials developed or distributed, the number of hotline calls, the number of outreach activities, and the number of temporary and final protection orders requested and granted. Instructions and reporting tools for completing the SASP Annual Progress Report can be accessed at:

<http://muskie.usm.maine.edu/vawamei/saspform ulaform.htm>.

Goals, Objectives and Performance Measures Report

Reporting progress achieved on the performance measures is required. CVSD E-Grants has a specific reporting form to respond to progress on the goals, objectives, output measures and outcome measures.

Note: If a grant receives a time extension, a final narrative and goals, objectives and performance measure report covering the duration of the extension must be submitted within 30 days of the grant closing.

Client Feedback on Common Outcome Measures

All SASP grant recipients are required to collect feedback on services provided using the prescribed common outcome measures listed below. The client feedback will not be tied to the specific, SASP funded project, but rather to all victim services provided by the program. Programs are asked to collect client feedback from at least 10% of appropriate clients with the goal of a 90% positive response.

Programs may use Client Feedback Forms already in use in their agency, however, all programs are required to include the appropriate outcome measures described below.

Programs serving primarily adult sexual assault victims are required to report client responses collected by one of three types of services

provided: (1) clients receiving shelter services; (2) clients receiving support group services; and (3) clients receiving non-shelter based advocacy and other services. **Programs do not have to collect evaluations from all three groups.**

The three common outcome measures are:

- *The program provided me with services that helped me make informed choices about my situation.* (This CVSD Common Outcome Measure is applicable to all program types and must be stated exactly as shown).
- *After working with this agency, I have some new ideas about how to stay safe.*
- *After working with this agency, I know more about resources that may be available, including how to access them.*

Programs serving primarily victims of child sexual abuse are required to report client responses on the following common outcome measures:

- *The program provided me with services that helped me make informed choices about my situation.”* (This CVSD Common Outcome Measure is applicable to all program types and must be stated exactly as shown).
- *The program staff treated my family with sensitivity and respect.*
- *The program staff was supportive in helping me to access recommended treatment services for my child and family.*

Grantees are only obligated to survey appropriate clients, and should specify which clients will be surveyed via an internal, agency policy. For example, no clients in crisis would be appropriate, whereas support group clients, clients exiting shelter, or clients receiving follow-up services may be more appropriate. The forms are due quarterly, at the same time as the QFRs. Please contact your CVSD Fund Coordinator if you are unsure of which set of questions to include on your client feedback form.

GRANTEE MONITORING

OVERVIEW

DOJ CVSD is responsible for the monitoring of grant recipient awards to ensure compliance with applicable federal and state guidelines. DOJ CVSD will provide program and fiscal monitoring and evaluation of grants between DOJ CVSD and grant recipients. Monitoring is conducted to determine if the grant recipient is adequately providing services outlined in their grant application and in accordance with the DOJ CVSD Grant Agreement, established program policies and procedures and this grant management handbook. Accomplishing these grant recipient monitoring objectives is achieved through a variety of monitoring techniques, including grant monitors' review of reports, the telephone interview and on-site visits to the grant recipient agency.

SITE VISITS

A site visit may be prompted by: concerns within the agency, either as reported to the grant monitor by the agency or other parties; routine time for a visit (24 months since last visit), with no apparent concerns; or a request for a site visit by the grantee. Prior to the scheduled, in-person visit to the location of a grantee, a structured telephone interview will be held with the director or project manager. The telephone interview and in-person site visit will include a review of the following:

- Program administration;
- Financial reporting and accounting;
- Systems and controls;
- Program service delivery; and
- Compliance with federal and state regulations/guidelines as appropriate.

Each grantee is responsible for keeping records that fully disclose the amount and disposition of the proceeds of the grant. This includes financial documentation for disbursements, daily time/attendance records specifying time devoted to VAWA allowable victim services, client files, the portion of the grant supplied by other

sources of revenue, job descriptions, contracts for services, receipts and other records which facilitate an effective site visit or desk review.

Records shall also be kept pertaining to the total cost of the services for which the grant is awarded, the amount and disposition of the proceeds of the grant, and the amount and disposition of that portion of total costs provided from non-federal sources. The procedures developed by each grant must provide for the accurate and timely recording of the receipt of funds, expenditures and unexpended balances. Adequate documentation of each transaction shall be maintained to permit the determination, through a site visit or desk review, of the accuracy of the records and whether expenditures charged to grant funds are allowable. All records relating to the VAWA grant must be retained and available for inspection for a period of six (6) years following the end of the federal grant period (the grant end date). Please refer to Appendix B for a copy of the grant monitoring form used by your DOJ CVSD Fund Coordinator for both the telephone and in-person portions of your program review.

REQUEST FOR AMENDMENT REQUIREMENTS

Request for Amendments

An amendment request is used to request programmatic and/or financial changes associated with a grant award as they occur during the grant cycle. Consider the following when requesting an amendment:

- At no time may a program or budget modification change the scope of the original grant agreement.
- Funds may only be moved and spent within the scope of the approved services.
- Budget revisions do not change the total amount of funding available for the grant.
- If a grantee determines that any modification of the approved budget or the extension of a grant period is necessary, a request should be made in E-Grants using the "Amendment Request" page.
- **The grantee must obtain approval from CVSD for any amendment requests prior to the change being implemented.** All amendment requests must be received at least 45 days prior to the end of the award period to be considered during the final quarter of a grant award.
- Requests submitted after the project end date or those that would require retroactive approval shall be denied, unless an exception is granted for extenuating circumstances.
- CVSD will review each amendment request and will approve on a case-by-case basis.

Budget Amendments

A budget amendment request is required for any of the following circumstances:

- Redirection of funds in or out of the Personnel category;* OR
- Movement of funds that totals more than \$500 in the Services and Supplies or Other Services categories; OR
- Movement of funds to any unbudgeted category; OR
- Extension of the project period.

* Budget category is defined as being either Personnel, Services and Supplies or Other Services and the individual budget line items contained within.

Budget Amendment Documentation:

The following information must be submitted when completing a formal budget amendment request:

- A completed Amendment Request page in E-Grants;
- A completed Budget Amendment Request form.

Both the VAWA and the SASP Budget Amendment Request Forms can be downloaded from the Amendment Request page in E-Grants and must be uploaded in the Form/Document Upload section on the Amendment Request page once completed.

If approved, CVSD staff will make the requested changes to the grantees budget in the E-Grants system and the grantee will be notified of the approval via a system notification in E-Grants.

Once approved, all subsequent QFRs will automatically contain the amended grant budget. Grantees will not be able to submit QFRs while an amendment request is in process.

Program Amendments

While not an inclusive list, the following changes will require a program amendment:

- Modifying the approach, or scope of any component of the program.
- Making any change in collaborative partnerships.
- Adding, deleting, increasing, or decreasing an activity or goals, objectives or performance measures.

When requesting a ***program amendment***, a detailed explanation and justification will be required on the Amendment Request page in E-Grants that includes a complete description of the requested change and the effect the change will have on the project.

If approved, CVSD staff will make the requested changes. As appropriate, to the grantees goals, objectives, activities and performance measures in the E-Grants system and the grantee will be notified of the approval via a system notification in E-Grants.

Once approved, all future progress reports submitted must reflect any revised goals, objectives, activities, and/or performance measures.

Deobligated Funds

If funds are not expended by the end of the grant period, DOJ CVSD will deobligate the remaining funds from the grantee. A letter will be sent to the grantee informing the grantee that funds have been deobligated and the grant is closed.

ACCOUNTING AND AUDITING REQUIREMENTS

ACCOUNTING SYSTEMS

Grantees must establish and maintain accounting systems that accurately account for grant and match funds. Grantees must maintain, for a minimum of six years after completion of the grant or until an audit is completed, whichever are later, adequate books, records, and supporting documents to verify the amounts, recipients, and uses of all disbursements of funds passing in conjunction with this agreement.

COMMINGLING OF FUNDS

Federal agencies shall not require physical segregation of cash deposits or the establishment of any eligibility requirements for funds that are provided to a recipient. However, the accounting systems of all recipients and sub recipients must ensure that VAWA funds are not commingled with funds from other funding sources. Each award must be accounted for separately. Recipients and sub recipients are prohibited from commingling funds on either a program-by-program basis or a project-by-project basis.

Funds specifically budgeted and/or received for one program may not be used to support another. Where a recipient's or sub recipient's accounting system cannot comply with this requirement, the recipient or sub recipient shall establish a system to provide adequate fund separation and accountability for each program that it has been awarded.

AUDIT THRESHOLD

Non-federal entities that **expend** \$500,000 or more in federal funds (from all sources) in the organization's fiscal year shall have a single organization-wide audit conducted in accordance with the provisions of OMB Circular A-133. Records must be available for review or audit by appropriate officials including the federal agency, DOJ, and General Accounting Office (GAO). Audits are due no later than six (6) months after the close of each fiscal year during the term of the award.

Non-federal entities that **expend** less than \$500,000 a year in federal funds are exempt from federal audit requirements for that year. Audit costs for audits not required in accordance with OMB Circular A-133 are unallowable. If the grantee did not expend \$500,000 or more in federal funds in its fiscal year, but contracted with a certified public accountant to perform an audit, these costs may not be charged to the grant.

Grantees are not required to send copies of audits to DOJ CVSD unless they are required to conduct single organization-wide audits.

The federal CFDA number for VAWA-funded projects is 16.588 and for SASP-funded projects is 16.017.

Grant funds are awarded subject to fiscal and program conditions to which the grantee expressly agrees. According to the audit threshold, the audit objective is to review the grantee's administration of the program for the purpose of determining whether the grantee has:

- Established an accounting system integrated with adequate internal fiscal and management control to provide full accountability for revenues, expenditures, assets, and liabilities.
- Prepared financial statements that are presented fairly, in accordance with generally accepted accounting principles.
- Prepared financial reports to support claims for reimbursement that contain accurate and reliable financial data and are presented in accordance with the terms of the applicable agreements.
- Expended program funds in accordance with the agreement and federal and state rules.

FEDERAL ACCOUNTING REQUIREMENTS

The subgrantee is responsible for establishing and maintaining an adequate system of accounting and internal controls for itself.

Elements of Accounting System. Accounting systems are made up of a series of operations that involve classifying, recording, summarizing, and reporting transactions. Elements of the system must consist of an account structure, accounting records, source documents, a system for coding financial transactions, and written procedures prescribing the manner in which and by whom these operations are performed. A grantee's accounting system must include the following:

1. System coding or classification must permit summarization and reporting of grant expenditures by specific programs, projects, uniform receipt and expenditure classifications, and major steps funded in the approved budget cost categories.
2. Accounting records should adequately identify the receipt and the expenditures of each grantee, subgrantee or contractor.
3. Accounting records, which must include a ledger and supporting books of account, should refer to subsidiary records or documentation which support each entry and which can be readily located and identified with the grant.
4. Accurate, current, and complete financial reporting information.
5. Systems integration with an adequate system of internal controls to safeguard grant funds and properties, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence by the grantee to prescribed management policies.

Accounting Systems are generally one of three kinds:

1. **Cash Basis** — Expenses are recorded when cash is spent and revenues are recorded when cash is received. This system provides little information on which to base expenditure planning.

2. **Obligation Basis** — where expenses are recorded when the funds are obligated. This system is little used and is not preferred.
3. **Accrual Basis** — Revenues are recorded when goods or services are delivered and expenses are recorded when goods or services are consumed without regard to the timing of the exchange of cash. This system is preferred because it best matches revenues and expenses with the period in which they are actually earned or accrued. Accrual accounting also contains information on the receipt and disbursement of cash.

Internal Controls. The grantee must establish and maintain a system of internal controls adequate to safeguard grant funds and resources, check the accuracy and reliability of the grant accounting and financial data, promote the operational efficiency of the grantee, and encourage adherence to the grantee's prescribed managerial policies.

Appropriate internal controls are comprised of a plan of organization (grantee policies, structure, division of staff functions, procedures, staff qualifications, etc.) designed to provide the grantee with effective financial and operational control over either its grant programs or projects.

The degree of internal control is dependent upon the size of the grantee and the funds and resources for which the grantee is responsible. The following criteria are basic to an adequate system of internal control:

1. Operating policies must be clearly stated; systematically communicated throughout the organization; in conformance with applicable laws and external regulations and policies; and designed to promote the execution of authorized activities effectively, efficiently, and economically.
2. Organizational structure must define and assign responsibility for the performance of all duties necessary to carry out the functions of the grantee.
3. Responsibility for assigned duties and functions of the grantees must be classified according to authorization, performance,

record keeping, custody of resources, and review, to provide proper internal checks on performance and to minimize unauthorized internal checks on performance and to minimize unauthorized, fraudulent, or otherwise irregular acts.

4. A system of forward planning, embracing all phase of the grantee's operation, must be developed to determine and justify financial, property, and personnel requirements and to carry out grant operations effectively, efficiently, and economically.
5. Grant procedures must be simple, efficient, and practical, giving due regard to the nature of the grant and applicable legal and regulatory requirements. Feasibility, cost, risk of loss or error, and availability and suitability of personnel are factors that should be considered in formulating the procedures.
6. An adequate system of authorization, record keeping, and transaction coding procedures must be designed by the grantee to ensure compliance with prescribed grant requirements and restrictions of applicable laws, regulations, and internal management policies; to prevent illegal or unauthorized transactions; and to provide proper accounting records for the expenditure of grant funds.
7. An adequate and efficiently operated information system must be designed to provide prompt, essential, and reliable operating and financial data to the grantee responsible for decision-making and performance review.
8. The performance of all duties and functions of grantee personnel must be properly supervised. All performance must be subject to adequate review under an effective internal audit program to determine whether performance is effective, efficient and economical and whether management policies are observed; applicable laws, prescribed regulations, and grant conditions are obeyed; and regulations, and unauthorized, fraudulent, or otherwise irregular transactions or activities are prevented or discovered.
9. The qualifications of officials and employees with regard to education, training,

experience, competence, and integrity must be appropriate for the responsibilities, duties, and functions assigned to them.

10. Each official and employee must be fully aware of his/her assigned responsibilities and understand the nature and consequences of his/her performance. Each must be held fully accountable for the honest and efficient discharge of his/her duties and functions, including, where applicable, the custody and administration of funds and property, and compliance with grant regulations and legal requirements.
11. Effective procedures must be implemented for expenditure control to ensure that needed goods and services are acquired at the lowest possible cost; that goods and services paid for are actually received; that quality, quantity, and prices are in accordance with applicable contracts or other authorizations by grant officials and that such authorizations are consistent with applicable statutes, regulations, policies, and grant requirements.
12. All funds, property, and other resources for which the grantee is responsible must be appropriately safeguarded and periodically inventoried to prevent misuse, unwarranted waste, deterioration, destruction, or misappropriation.

Management System. The grantee should have a management system meeting the following criteria:

1. Established state, local government, and organization administrative and fiscal practice and policies must be followed by subordinate bodies in the administration of federal grant funds.
2. When no established policies and practices govern, reasonable and prevailing administrative and fiscal practices in the area (preferably adapted from public practice) shall be formally adopted and made a matter of record. The record must contain documentation showing that the standards of reasonableness and prevailing practice have been met.
3. Administrative and fiscal policies must be applied consistently regardless of the source of funds.

Budget and Accounting.

1. Establish indirect cost budgets on a basis consistent with the way resources are to be consumed and accounted for.
2. Record all applied direct costs in work accounts on a basis consistent with the budgets in a formal system that is controlled by the general books of account.

Analysis by the Grantee.

1. Identify at the work account level on a monthly basis using data from, or reconcilable with, the accounting system:
 - a) Budgeted cost for work scheduled and budgeted cost for work performed.
 - b) Budgeted cost for work performed and applied direct costs for the same work.
 - c) Variances resulting from the above comparisons classified in terms of labor, materials, or other appropriate elements together with the reasons for significant variances.
2. Identify on a monthly basis in the detail needed by management for effective control, budgeted indirect costs, actual indirect costs and variances along with the reasons therefor.
3. Summarize the data elements and associated variances listed in 1 and 2 above through the grantee organization and to the reporting level specified in the grant.
4. Identify on a monthly basis significant differences between planned and actual technical performance together with the reasons therefor.
5. Identify managerial actions taken as a result of the above.
6. Monitor the effectiveness of actions taken to resolve problems or correct deficiencies.
7. Based on performance to date and on estimates of future requirements, develop revised estimates of cost at completion for elements identified in the grant and compare these with the grant baseline budgets, with current budgets.

Revisions and Access to Data.

1. Incorporate grant changes in a timely manner recording the effects of such changes in budgets and schedules.
2. Prohibit retroactive changes to records pertaining to work performed that will change previously reported amounts for applied direct costs, or indirect costs, except for correction of errors and routine accounting adjustments.
3. Prevent revisions to the grant budget baseline except for Government-directed changes to authorized effort, that is, scope, work, and schedules.
4. At the time changes occur, advise the grantor agency of any changes to baseline budgets or schedules.
5. The duly authorized representatives of the grantor agency shall be provided access to all of the foregoing information and records in support thereof.

Personnel and Compensation.

1. The organization will operate under a comprehensive plan that includes a scale of rates or ranges based upon the responsibilities of each position and its relationship to other positions.
2. Compensation paid shall be reasonable. Compensation will be considered reasonable if it is a part of a public compensation plan prescribed for the grantee, or if it is comparable to that paid for similar work in the labor market in which the grantee must compete for the kind of employees involved.
3. The compensation plan must include provisions concerning weekly hours of work; payment, if any, for overtime work; prior approval of all overtime work; and provisions establishing for each authorized part-time position the number of hours to be served each pay period by the incumbent.
4. In the absence of an applicable public fringe benefit plan, fringe benefits extended to employees must be reasonable and of general application. Fringe benefits will be considered reasonable if they are comparable to the benefits extended to employees of similar organizations in the same area.

Safeguarding of Assets. All funds, property, and other resources for which the grantee is responsible shall be appropriately safeguarded and periodically inventoried under appropriate policies and procedures.

PUBLICITY AND PUBLICATIONS

PUBLICITY

Grantees are encouraged to inform the public and the media about the accomplishments of their programs. Responsibility for the direction of the programs should not be ascribed to the U.S. Department of Justice. Press releases or other published accounts of program activities and results must include the following statement:

“The opinions, findings, and conclusions or recommendations expressed in this publication, program, or exhibition are those of the author(s) and do not necessarily reflect the views of the Department of Justice, or Crime Victims’ Services Division.”

Any publication (written, visual, or audio, but excluding press releases, newsletters, and issue analyses) issued by the grantee or any of its subgrantees describing programs funded in whole or in part with federal funds, shall contain the following statement:

“This program was supported by grant # _____, awarded by the Office on Violence against Women (OVW), Office of Justice Programs, U.S. Department of Justice, through Oregon Department of Justice, Crime Victims’ Services Division. OVW is a component of the Office of Justice Programs, which also includes the Office of Juvenile Justice and Delinquency Prevention, Bureau of Justice Statistics, National Institute of Justice, Corrections Program Office, and the Office for Victims of Crime. Points of view or opinions contained within this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice, or CVSD.

When issuing statements, press releases, requests for proposals, bid solicitations, and other documents describing projects or programs funded in whole or in part with federal money, the grantee shall include an acknowledgment similar to the following:

“A \$_____ grant awarded by the U.S. Department of Justice paid _____ portion of the cost of this project.”

PUBLICATIONS

All publications and distribution agreements with a publisher shall include provisions giving the federal government a royalty-free, non-exclusive and irrevocable license to reproduce, publish, or otherwise use the material in any fashion it deems appropriate. Unless otherwise specified in the agreement, the recipient may copyright any books, publications, films or other material developed or purchased as a result of grant activities subject to the right of the federal government.

STOP VIOLENCE AGAINST WOMEN ACT (VAWA) IMPLEMENTATION PLANNING SUBCOMMITTEE

Steve Bellshaw, Deputy Chief
Salem Police Department
Salem, OR

Sybil Hebb, Director of Legislative Advocacy
Oregon Law Center
Portland, OR

Kim Larson, Director
Marion County District Attorney's Office
Victim Assistance Division
Salem, OR

**Desiree Coyote, Family Violence Services
Program Manager**
Confederated Tribes of the Umatilla Indian
Reservation
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**Cheryl O'Neill, Domestic & Sexual Violence
Coordinator**
Oregon Department of Human Services, Child
Protective Services Unit
Salem, OR

Rebecca Orf, Juvenile Law Counsel
Court Programs and Services Division
Oregon Judicial Department
Salem, OR

Michele Roland-Schwartz, Executive Director
Attorney General's Sexual Assault Task Force,
Salem, OR

Vanessa Timmons, Executive Director
Oregon Coalition Against Domestic and Sexual
Violence
Portland, OR

Cathy Relang, VOCA Fund Coordinator
Oregon Department of Justice, Crime Victims'
Services Division (DOJ CVSD)
Salem, OR

**Erin Greenawald, Statewide Domestic
Violence Resource Prosecutor (DVRP)**
DOJ, Criminal Justice Division
Salem, OR

SEXUAL ASSAULT SERVICES PROGRAM (SASP) SUBCOMMITTEE

Diana Camarillo
Sexual Violence Program Coordinator
OR Coalition Against Domestic & Sexual Violence

Jenna Harper,
Training Coordinator
Attorney General's Sexual Assault Task Force,

Keri Moran-Kuhn
Director of Programs
OR Coalition Against Domestic & Sexual Violence

Kim Larson
Director, Victim Assistance Program
Marion County District Attorney's Office

Helen O'Brien
Director, Victim Assistance Program
Multnomah County District Attorney's Office

Cheryl O'Neill
Domestic & Sexual Violence Coordinator
DHS, Child Protective Services Unit

Michele Roland-Schwartz
Executive Director
Attorney General's Sexual Assault Task Force

GLOSSARY OF TERMS

Accounting Principles: Accrual	Accrual basis is the method of recording revenues in the period in which they are earned, regardless of when cash is received, and reporting expenses in the period when the charges are incurred, regardless of when payment is made.
Accounting Principles: Cash	Cash basis is the method of reporting revenues and expenses when cash is actually received or paid out.
Assistance in Filing Compensation Claims	Includes making victims aware of the availability of crime victim compensation and assisting the victim in completing the required forms and in gathering the needed documentation. It may also include follow-up contact with the victim compensation agency on behalf of the victim.
Authorized Official	An “Authorized Official” is defined as the person(s) within the agency who is legally responsible for obligating the organization to receive funding, to incur indebtedness and to comply with the requirements of the VOCA grant.
Commingling of Funds	Literally means “mixing together” and when used in a legal context is a bread of trust in which a fiscal agent mixes funds making it difficult to determine which funds belong to a particular grant or fund. Accounting system of all grantees must ensure that VAWA or SASP funds are not commingled with funds from any other source. Funds specifically budgeted and/or received for one grant project may not be used to support another.
Community-Based Organization	<p>The term “community-based organization” means an organization that –</p> <ul style="list-style-type: none"> a) Focuses primarily on domestic violence, dating violence, sexual assault, or stalking <i>(Example: A nonprofit, nongovernmental victim services organization that provides services to victims of violence against women through shelter, advocacy and safety planning.);</i> b) Has established a specialized culturally specific program that addresses domestic violence, dating violence, sexual assault, or stalking <i>(Example: A nonprofit, nongovernmental victim services organization whose primary focus is to meet the specialized needs of linguistically and culturally specific population groups by providing services that offer full linguistic access and culturally specific services and resources, including outreach, collaboration, and support mechanisms. This does not include mainstream organizations with a bi-cultural/bi-lingual advocate on staff.);</i> c) Has a primary focus on underserved populations (and includes representatives of these populations) and domestic violence, dating violence, sexual assault, or stalking <i>(Example: A nonprofit, nongovernmental victim services organization that primarily focuses on providing services to Hispanic/Latina victims of violence against women.);</i> or d) Obtains expertise, or shows demonstrated capacity to work effectively, on domestic violence, dating violence, sexual assault, and stalking through collaboration <i>(Example: A faith-based organization that provides shelter services to homeless women and their families may apply for STOP Program funds to support a domestic violence advocate that collaborates with a District Attorney’s Victim Assistance Program to provide safety planning, advocacy, and support group services to victims of domestic violence.)</i>

Conditional Award	All grant awards are made conditional upon the timely completion of grant award documents. Funds are not considered obligated and will not be transferred until all required grant award documents have been signed by an applicant and by the Department designee. In addition, an award may be made conditionally if the grantee is not current in reporting for any previous grant award; has fewer than two full years of operational history in providing services to victims of domestic violence and sexual assault; has not fully demonstrated the ability to successfully manage any previous Fund awards.
Confidentiality	This means that grantees will not disclose any personally identifying information or individual information collected in connection with services requested, utilized, or denied through programs; or reveal individual client information without the informed, written, reasonably time-limited consent of the person (or in the case of an un-emancipated minor, the minor and the parent or guardian or in the case of persons with disabilities, the guardian) about whom information is sought, whether for this program or any other Federal, State, tribal, or territorial grant program, except that consent for release may not be given by the abuser of the minor, person with disabilities, or the abuser of the other parent of the minor. <i>Please see page 8 of the Handbook for additional details.</i>
Court based and court-related personnel	The term “court-based” and “court-related personnel” mean persons working in the court whether paid or volunteer, including – <ul style="list-style-type: none"> a) Clerks, special masters, domestic relations officers, administrators, mediators, custody evaluators, guardians ad litem, lawyers, negotiators, probation, parole, interpreters, victims assistants, victim advocates, and judicial, administrative, or any other professionals or personnel similarly involved in the legal process; b) Court security personnel; c) Personnel working in related, supplementary offices or programs (such as child support enforcement); and Any other court-based or community-based personnel having responsibilities or authority to address domestic violence, dating violence, sexual assault, or stalking in the court system
Courts	The term "courts" means any civil or criminal, tribal, and Alaska Native Village, Federal, State, local or territorial court having jurisdiction to address domestic violence, dating violence, sexual assault or stalking, including immigration, family, juvenile, and dependency courts, and the judicial officers serving in those courts, including judges, magistrate judges, commissioners, justices of the peace, or any other person with decision-making authority.
Criminal Justice Support/Advocacy	Refers to law enforcement and prosecution investigation support, assistance during investigation, and explanation of procedures, etc. Included in this definition are: court-related support, i.e., court orientation, court escort, case appearance notification, case status and disposition information, victim impact reports, assistance with restitution, witness fees, intimidation or protection services, transportation, child care, property return, etc.; and post-sentencing services following the disposition of a criminal court proceeding, including offender release notification at the probation, parole, and pardon stages of the criminal justice system, etc.
Crisis Counseling	Refers to in-person crisis intervention, emotional support, and guidance and counseling on an individual basis provided by counselors, mental health professionals or peers. Such counseling may occur: a) at the scene of a crime; b) immediately after a crime; c) at the first, in-person contact between a counselor and victim (this would include meeting a victim in an emergency room, police station, district attorney’s office, etc.); d) during in-person contact for the duration of the crisis experience.

Crisis Hotline	Typically refers to the operation of a 24-hour telephone service, 7 days a week, which provides counseling, and information and referral to victims and survivors.
Dating partner	Refers to a person who is or has been in a social relationship of a romantic or intimate nature with the abuser, and where the existence of such a relationship shall be determined based on a consideration of – a) The length of the relationship; b) The type of relationship, and c) The frequency of interaction between the persons involved in the relationship.
Dating violence	Refers to violence committed by a person— a) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and b) Where the existence of such a relationship shall be determined based on a consideration of the following factors; (i) The length of the relationship (ii) The type of relationship (iii) The frequency of interaction between the persons involved in the relationship.
Direct Costs	Activities that extend and enhance services to victims of domestic violence, sexual assault, teen dating violence or stalking. These include all of the allowable services as listed on pages 24 - 26 in this Handbook.
Domestic Violence	Includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabiting with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other adult person against a victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.
DUNS Number	The DUNS number is a unique nine-character number that identifies your organization. It is a tool of the federal government to track how federal money is distributed. Obtaining a DUNS number places your organization on Dun & Bradstreet marketing list that is sold to other companies. You can request not to be added to this list during your application.
Elder Abuse	Means any action against a person who is 50 years of age or older that constitutes the willful- a) Infliction of injury, unreasonable confinement, intimidation, or cruel punishment with resulting physical harm, pain, or mental anguish; or b) Deprivation by a person, including a caregiver, of goods or services with intent to cause physical harm, mental anguish, or mental illness.
Emergency Financial Assistance	Refers to locating emergency loans and petty cash; assistance in filing for losses covered by public and private insurance programs including worker’s compensation, unemployment benefits, welfare, and Medicare; and payment for taxis, food, emergency shelter, and clothing.
Emergency Legal Advocacy	Refers to filing temporary restraining orders, injunctions and other protective orders, elder abuse petitions, and child abuse petitions but does not include criminal prosecution or the employment of private attorneys for non-emergency purposes.
Equipment	Tangible nonexpendable personal property having a useful life of more than one year and an acquisition cost of \$5,000.000 or more per unit.

Follow-up Contact	Refers to individual emotional support, empathetic listening, and guidance for other than crisis reactions after the victimization.
Grant Agreement	The legal document between a grantor and a grantee/subgrantee that describes in detail the obligations under the terms of the grant. A grant agreement must be approved and signed by an authorized signatory before a program can receive funds.
Grant Monitoring: Desk Review	Review of documentation submitted by a grantee/subgrantee, typically financial and programmatic/statistical documentation over a pre-determined period of time. These documents will be reviewed for accuracy and compliance with terms and conditions of the grant and followed by a conference call using a desk audit review form. This type of monitoring may be used as an alternative to an in-person site visit.
Grant Monitoring: Phone Review	A phone review or conference call is a component to both the desk audit and the in-person site visit. A phone review provides the grantee/subgrantee the opportunity to: 1. Prepare for the in-person site visit and 2. To discuss issues as they relate to program activities or documentation in a desk audit.
Grant Monitoring: Site Visit	A site visit refers to the monitoring of a grantee/subgrantee by a fund coordinator at the place of business. A site visit is preceded by a phone review to prepare the agency for the in-person visit. Typically financial and programmatic/statistical documentation will be reviewed over the phone and viewed at the site visit. Site visits afford a fund coordinator the opportunity to look closely at the grantee's operation, meet with management and staff and to establish a positive working relationship between the monitoring agency and the service provider.
Grant Monitoring: Technical Assistance	Technical assistance is provided to a grantee/subgrantee at their request. The Fund Coordinator will meet with the grant project director and any grant funded staff. The purpose of this visit is to help ensure the grantee/subgrantee understands the grant requirements and to offer assistance and respond to questions.
Group Treatment/Support.	Refers to the coordination and provision of supportive group activities. This category includes self-help, peer, social support, drop-in groups, and community crisis intervention in a group setting.
Indian tribe	A tribe, band, nation, or other organized group or community of Indians, including any Alaska Native village or regional or village corporation (as defined in, or established pursuant to, the Alaska Native Claims Settlement Act (43 U.S.C. 1601 et seq.), that is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.
Indirect Costs	Indirect costs are costs of an organization that are not readily assignable to the particular grant, but are necessary to the operation of the organization and the performance of the grant (i.e., information services, payroll costs, depreciation and administrative salaries). The costs of property liability insurance on buildings, capital improvements, security guards and body guards, property losses and expenses, real estate purchases, mortgage payment and construction may not be supported with VAWA or SASP funds.
Information and Referral (in-person)	Refers to in-person contacts with the victim and identifying services offered and support available by the subgrants project and other community agencies
Information and Referral (telephone).	Refers to telephone contacts with the victim and identifying services offered and support available by subgrant projects and other community agencies.
Law Enforcement	Means a public agency charged with policing functions, including any of its component bureaus (such as governmental victim services programs).

Legal Assistance	Includes assistance to adult and youth victims of domestic violence, dating violence, sexual assault, and stalking in – a) family, tribal, territorial, immigration, employment, administrative agency, housing matters, campus administrative or protection or stay away order proceedings, and other similar matters; and b) criminal justice investigations, prosecutions and post-trial matters (including sentencing, parole, and probation) that impact the victim’s safety and privacy.
Linguistically and Culturally Specific Services	Means community-based services that offer full linguistic access and culturally specific services and resources, including outreach, collaboration, and support mechanisms primarily directed toward underserved communities
Match (Cash)	A program’s cash outlay used to support a specific grant. Cash match include non-federal money contributions from public agencies or private foundations grants and private organizations or individuals. Examples include: Unitary Assessment, United Way funds, ODSVS, DHS Marriage License Tax funds (MLT and CFAA only)
Match (In-Kind)	A value is place of non-cash contributions used to support the program grant. In-kind contributions include: donations, pro-rated work space, volunteers, office supplies.
MOU	Memorandum of Understanding. An MOU is required of an agency when they have applied for funds with partnering organizations. The MOU provides documentation that demonstrates the organizations have consulted and coordinated the responsibilities of their grant activities.
Outcome Measures	Changes in participants’ lives as a result of the staff activities.
Performance Measures	Markers that indicate whether the program has met its objectives. Performance measures consist of target outputs and short term outcome measures.
Personal Advocacy	Refers to assisting victims in securing rights and services from other agencies; intervention with employers, creditors and others on behalf of the victim; and other general information on rights and remedies available to the victim.
Personal Identifying Information	Individually identifying information for or about an individual victim of crime including (1) a first and last name; (2) a home or other physical address; (3) contact information (including a postal, e-mail or Internet protocol address, or telephone or facsimile number); (4) a social security number; and (5) any other information, including date of birth, racial or ethnic background, or religious affiliation, that, in combination with any other non-personally identifying information would serve to identify any individual.
Prosecution	Means any public office or agency charged with direct responsibility for prosecuting criminal offenders, including such offices or agency’s component departments or bureaus such as governmental victims services programs.
Protection Order or Restraining Order	Includes, a) any injunction, restraining order, or any other order issued by a civil or criminal court for the purpose of preventing violent or threatening acts or harassment against, sexual violence or contact or communication with or physical proximity to, another person, including any temporary or final orders issued by civil or criminal courts whether obtained by filing an independent action or as a pendent lite order in another proceeding so long as any civil order was issued in response to a complaint, petition, or motion filed by or on behalf of a person seeking protection; and b) any support, child custody or visitation provisions, orders, remedies, or relief issued as a part of a protection order, restraining order, or stay away injunction pursuant to State, tribal, territorial, or local law authorizing the issuance of protection orders, restraining orders, or injunctions for the protection of victims of domestic violence, dating violence, sexual assault, or stalking.

RFA	Request for Application
Rural area and rural community	Refers to; <ul style="list-style-type: none"> a) any area or community, respectively, no part of which is within an area designated as a standard metropolitan statistical area by the Office of Management and Budget; or b) any area or community, respectively, that is- <ul style="list-style-type: none"> (i) within an area designated as a metropolitan statistical area or considered as part of a metropolitan statistical area; and (ii) located in a rural census tract.
Sexual Assault	Any conduct prescribed by chapter 109A of Title 181, United States Code, whether or not the conduct occurs in the special maritime and territorial jurisdiction of the United States or in a federal prison and includes both assaults committed by offenders who are strangers to the victim and assaults committed by offenders who are known or related by blood or marriage to the victim.
Shelter/Safe House	Refers to offering short-term and long-term housing and related support services to victims and members of their family following victimization
Stalking	To engage in a course of conduct directed a specific person that would cause a reasonable person to – <ul style="list-style-type: none"> a) fear for her or his safety or the safety of others; or suffer substantial emotional distress
Subgrantee or Subrecipient	Any agency receiving grant funding from the Oregon Department of Justice, Crime Victims' Services Division
Supplanting	Federal funds must be used to supplement existing funds for program activities and NOT replace those already funded. VAWA or SASP funds are intended to expand or enhance direct victim services. Therefore, federal grant funds may not be used to supplant, replace or divert other sources of support within government agencies unless it can be demonstrated that such other support is, or will be, eliminated or reduced for reasons other than the receipt of federal VAWA or SASP funds. This supplanting clause applies only to state and local public (government) agencies. Nonprofit agencies are not bound by non-supplanting rules.
System for Award Management (SAM)	The System for Award Management (SAM) is a web-enabled government wide application that collects, validates, stores, and disseminates business information about the federal government's trading partners in support of the contract award, grants, and the electronic payment processes.
Target Outputs	These are proposed results of staff activities. Target outputs should show the: number of clients served, types of client served, length of time that it will take to serve the clients and number and type of services delivered.
Therapy	Refers to intensive professional psychological/psychiatric treatment for individuals, couples, and family members. This includes the evaluation of mental health needs, as well as the actual delivery of psychotherapy
Tribal nonprofit organization	Refers to— <ul style="list-style-type: none"> a) a victim services provider that has its primary purpose to assist Native victims of domestic violence, dating violence, sexual assault, or stalking; and b) staff and leadership of the organization must include persons with a demonstrated history of assisting American Indian or Alaska Native victims of domestic violence, dating violence, sexual assault, or stalking.

Tribal organization	<p>Refers to—</p> <ul style="list-style-type: none"> a) the governing body of any Indian tribe; b) any legally established organization of Indians which is controlled, sanctioned, or chartered by such governing body of a tribe or tribes to be served, or which is democratically elected by the adult members of the Indian community to be served by such organizations and which includes the maximum participation of Indians in all phases of its activities; or c) any tribal nonprofit organization.
Underserved Population	<p>Includes populations underserved because of geographic location (such as rural isolation), underserved racial or ethnic populations, populations underserved because of special needs (such as language barriers, disabilities, alienage status, or age), and any other population determined to be underserved by the Attorney General or by the Secretary of Health and Human Services, as appropriate.</p>
Unduplicated victims	<p>Refers to the method of counting victims for statistical purposes. Victims are counted only once on a statistical report during a grant cycle (1 year). If the victim experienced more than one victimization, that person should be counted only once under the primary victimization.</p>
Unliquidated Obligations	<p>Obligations or encumbered funds made toward the end of a grant period for which payment cannot be processed until after the grant period has ended. In most instances, these types of un-liquidated obligations will be due to accrued payroll expenses or, on rare occasions, an approved operating expense item, which had been ordered by the end of the grant period but not yet paid.</p>
Victim Advocate	<p>Means a person, whether or paid or serving as a volunteer; who provides services to victims of domestic violence, sexual assault, stalking or dating violence under the auspices or supervision of a victim services program.</p>
Victim Assistant	<p>The term “victim assistant” means a person, whether paid or serving as a volunteer, who provides services to victims of domestic violence, sexual assault, stalking, or dating violence under the auspices or supervision of a court or a law enforcement or prosecution agency.</p>
Victim Services or Victim Service Provider	<p>A nonprofit, nongovernmental organization that assists domestic violence, dating violence, sexual assault or stalking victims, including rape crisis centers, domestic violence shelters, faith-based organizations, and other organizations with a documented history of effective work concerning domestic violence, dating violence sexual assault, or stalking.</p>
Youth	<p>Means teen and young adult victims of domestic violence, dating violence, sexual assault, or stalking. STOP Program funded services must focus on adult women who are victims of domestic violence, sexual assault, stalking or dating violence.</p> <ul style="list-style-type: none"> • Services for children may be supported by STOP Program funds if the services are inextricably linked and are the direct result of providing services to an adult woman who is a victim of domestic violence, sexual assault, stalking or dating violence. For example, STOP program funds may support services for children who witness domestic violence and are considered secondary victims. • Services may be provided to adolescents age 13 and older who are 1) victims of dating violence, or 2) sexual assault by a person who is not a family or household member (as defined in ORS 107.705(3)). • Male victims may receive services under a STOP Program funded project as long as the project's primary focus is on efforts to stop violence against women.

APPENDICES

RESOURCES AND REFERRALS

NATIONAL ORGANIZATIONS		
RESOURCE	PURPOSE	WEB-ADDRESS
Asian & Pacific Island Institute on Domestic Violence	The Asian & Pacific Islander Institute on Domestic Violence is a national network serving as a forum for, and clearing house on information, research, resources and critical issues about violence against women in Asian and Pacific Islander communities.	http://www.apiahf.org/index.php/programs/domestic-violence.html
Campaign to Rescue and Restore Victims of Human Trafficking	This site includes numerous resources such as posters, toolkits to assist providers support victims of human trafficking. Great for awareness campaigns	http://www.acf.hhs.gov/trafficking/
Central Contractor Registration (CCR)	For registering, renewing, and updating a CCR. CCR is a requirement for VOCA and VAWA funding.	https://www.bpn.gov/ccr/default.aspx
Foundation Center	The Foundation Center maintains a comprehensive database on U.S. grantmakers and their grants.	http://www.foundationcenter.org/
Grants.gov	Federal funding opportunities.	http://www.grants.gov/
National Association of Volunteer Programs in Local Government	NAVPLG is an international association of administrators for volunteer programs in local, city, and county government. There is a best practices section, a yahoo group that volunteer managers can join.	http://www.navplg.org/
National Coalition Against Domestic Violence	The NCADV provides national level organization of communities and individuals working to end the violence in our lives.	http://www.ncadv.org/
National Criminal Justice Reference Service	NCJRS is a federally funded resource offering justice and substance abuse information to support research, policy, and program development worldwide. NCJRS offers a range of services and resources for victim assistance.	http://www.ncjrs.gov/
National Center for Victims of Crime	The NCVC is the nation's leading resource and advocacy organization for crime victims and those who serve them.	http://www.ncvc.org/ncvc/Main.aspx
National Crime Victim Law Institute	The NCVLI promotes and supports victims' rights and legal technical assistance to victims' attorneys and others serving victims.	http://www.ncvli.org/

National Network to End Domestic Violence	NNEDV offers a range of programs and initiatives to address the complex causes and far-reaching consequences of domestic violence and provides state coalitions with critical information and resources.	http://www.nnedv.org
National Organization for Victim Assistance	NOVA's promotes the rights and services for victims of crime It provides national advocacy, direct services to victims, assistance to professional colleagues	http://www.trynova.org/
National Criminal Justice Association	NCJA exists to promote the development of justice systems in states, tribal nations, and units of local government that enhance public safety; prevent and reduce the harmful effects of criminal and delinquent behavior on victims, individuals and communities; adjudicate defendants and sanction offenders fairly and justly; and that are effective and efficient.	http://www.ncja.org
National Sexual Violence Resource Center	NSVRC is a national information and resource hub relating to all aspects of sexual violence.	http://www.nsvrs.org
The National Victim Notification Network	The VINE system keeps victims informed about offenders.	https://www.vinelink.com/vinelink/initMap.do
Office for Victims of Crime	OVC was established by the 1984 Victims of Crime Act (VOCA) to oversee diverse programs that benefit victims of crime. OVC provides substantial funding to state victim assistance and compensation programs	http://www.ojp.usdoj.gov/ovc/
Office on Violence Against Women	Federal Office that distributes VAWA funding.	http://www.ovw.usdoj.gov/
Polaris Project (National Human Trafficking Resource Center)	Polaris Project is a leading organization in the U.S. combating all forms of human trafficking and serving both U.S. citizens and foreign national victims, including men, women, and children.	http://www.polarisproject.org/

STATE ORGANIZATIONS

RESOURCE	PURPOSE	WEB-ADDRESS
Department of Justice, Crime Victims' Services Division	Reporting forms and requirements, CVSD requests for applications, upcoming meetings and events	http://www.doj.state.or.us/crimev/index.shtml
Crime Victim's Compensation Program	The CVCP provides compensation for the financial losses of a victim and the victim's family as a result of violent crimes.	http://www.doj.state.or.us/crimev/comp.shtml

Attorney General's Sexual Assault Task Force	To provide leadership in Oregon for the efforts of improving the prevention of and response to sexual assault.	http://www.oregonsatf.org/
Crime Victim Assistance Network	CVAN advocates for the Rights of Victims and to Promote Victims Services. Includes State Victim Assistance Academy (SVAA)	http://www.oregonvictims.org/
Nonprofit Association of Oregon (formerly known as TACS)	NAO is a resource for nonprofit level organizations and a central source of information about the nonprofit sector.	www.nonprofitoregon.org/
Oregon Coalition Against Domestic and Sexual Violence	The Coalition provides technical assistance, training, and public education to local crisis centers and their communities.	http://www.ocadsv.com/
Oregon Law Center	Civil legal assistance for low income individuals.	http://www.oregonlawcenter.org/
Bureau of Labor and Industries Technical Assistance	BOLI/TA protects the rights of workers and citizens to equal, non-discriminatory treatment; encourages and enforces compliance with state laws relating to wages, hours, terms and conditions of employment; and advocates policies that balance the demands of the workplace and employers with the protections of workers and their families.	http://www.oregon.gov/BOLI/TA/
Oregon Human Trafficking Task Force	The OHTTF was formed to address a growing need for a comprehensive and collaborative response to human trafficking in the State of Oregon. The site provides basic human trafficking information.	http://159.121.4.213/ohttf/aboutus.html
Bureau of Labor and Industry Civil Rights Division	The BOLI Civil Rights Division enforces civil rights laws; Investigate civil rights complaints; advises and educates workers about their civil rights	www.boli.state.or.us/BOLI/CRD/C_Postings.shtml

PROGRAM RESOURCES

RESOURCE	PURPOSE	WEB-ADDRESS
Technical Assistance for Community Services	TACS is a technical assistance resource for non-profits.	http://www.tacs.org/
Foundation Center	The Foundation Center maintains a comprehensive database on U.S. grantmakers and their grants.	http://www.foundationcenter.org/
Oregon Crime Victim Rights Compliance Portal	This is part of the Oregon Department of Justice website and provides information on crime victim rights and services for both advocates and victims.	http://www.oregoncrimevictimsrights.org/

The National Victim Notification Network	The VINE system keeps victims informed about offenders.	http://www.appriss.com/VINE.html
Justice Solutions	Justice Solutions is a national non-profit organization dedicated to enhancing rights, resources and respect for victims and communities. The site is a great resource across topics.	http://www.justicesolutions.org/art_public.htm#impact
Free Management Library	The Free Management Library has a wealth of information, resources and references in 75 categories regarding leadership and management.	http://www.managementhelp.org/
TechSoup: The technology place for nonprofits	TechSoup provides a range of technology services for nonprofits, including news and articles, discussion forums, and discounted and donated technology products.	http://www.techsoup.org/
Grants.Gov	Federal Funding Opportunities	http://www.grants.gov/
NonProfitExpert.com	Federal Funding Opportunities	http://www.nonprofitexpert.com/federal_grants.htm
Central Contractor Registration	For registering, renewing, and updating your CCR, which is now a requirement for VOCA & VAWA funding.	https://www.bpn.gov/ccr/default.aspx
Office of Justice Programs, National Institute of Justice	Research, Development, and Evaluation	http://www.ojp.usdoj.gov/nij/topics/victims-victimization/welcome.htm
U.S. General Services Administration	Federal Per Diem Rates	www.gsa.gov/perdiem

REFERENCE DOCUMENTS

RESOURCE	PURPOSE	WEB-ADDRESS
USDOJ Financial Guide	Indepth guidelines for expending federal funds.	http://www.ojp.usdoj.gov/financialguide/
OVW Guidance on the Nonsupplanting Prohibition as it applies to Nonprofit Organizations	Supplanting guidance from OVW for nonprofits.	http://www.ovw.usdoj.gov/docs/supplanting-examples.pdf
Justification for Non-Competitive Procurement Document	Information on justification for sole source procurements.	http://www.ovw.usdoj.gov/docs/sole-source-guidelines.pdf
STOP VAWA Match Requirement Document	Tips for providing match.	http://www.ovw.usdoj.gov/docs/providingmatchtips.pdf
STOP VAWA Frequently Asked Questions	Addresses some frequently asked questions related to STOP VAWA.	http://www.ovw.usdoj.gov/docs/FAQ_FINAL_nov_21_07.pdf

Evaluation Guidebook for Projects Funded by STOP Formula Grants Under the Violence Against Women Act	A "How To" for evaluation of STOP VAWA funded projects.	http://www.urban.org/UploadedPDF/guidebook.pdf
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TRIBAL NATION RESOURCES		
RESOURCE	PURPOSE	WEB-ADDRESS
Burns Paiute Tribe	Federally recognized tribe in Oregon	http://www.burnspaiute-nsn.gov/
Confederated Tribes of Coos, Lower Umpqua & Siuslaw -	Federally recognized tribe in Oregon	http://www.ctclusi.org/CTCLUSINEW/default.aspx
Coquille Indian Tribe	Federally recognized tribe in Oregon	http://www.coquilletribe.org/
Cow Creek Band of Umpqua Indians	Federally recognized tribe in Oregon	http://www.cowcreek.com/
Confederated Tribes of Grand Ronde	Federally recognized tribe in Oregon	http://www.grandronde.org/
Klamath Tribes	Federally recognized tribe in Oregon	http://www.klamathtribes.org/
Confederated Tribes of Siletz	Federally recognized tribe in Oregon	http://www.ctsi.nsn.us/
Confederated Tribes of Umatilla Reservation	Federally recognized tribe in Oregon	http://www.umatilla.nsn.us/
Confederated Tribes of Warm Springs	Federally recognized tribe in Oregon	http://www.warmsprings.com/
Legislative Commission on Indian Services		http://www.leg.state.or.us/cis/



OREGON DEPARTMENT OF JUSTICE
 Crime Victims' Services Division
 Phone Review & Site Visit
 Monitoring Instrument

Agency/Program Name:	
Telephone Review Date:	
In Person Visit Date:	
Grant Monitor(s):	
Office Hours: (open to the public/open for appointments)	
Physical Address: (if not on current application, please indicate here)	
Program Contact:	
Fiscal Contact:	
Site Visit Schedule: <i>(Please contact the appropriate Fiscal Officer so we may meet during this visit.)</i>	

VOCA Grant:

Grant Number	Grant Type	Grant Amount	Match Amount	Time Period

Position Funded	FTE	Name of Staff	Changes in Job

VAWA Grant:

Grant Number	Grant Type	Grant Amount	Match Amount	Time Period

Position Funded	FTE	Name of Staff	Changes in Job

ODSVS Grant:

Grant Number	Grant Type	Grant Amount	Match Amount	Time Period

Position Funded	FTE	Name of Staff	Changes in Job

Other Grant:

Grant Number	Grant Type	Grant Amount	Match Amount	Time Period

Position Funded	FTE	Name of Staff	Changes in Job

Comments:

A. HUMAN RESOURCES & COMMUNITY PARTNERSHIPS

1. Board of Directors (Non Profits Only):

Attribute	Yes	No	Comments	Action
1. Represent Community	<input type="checkbox"/>	<input type="checkbox"/>		
2. Appropriate Size	<input type="checkbox"/>	<input type="checkbox"/>		
3. All Positions Filled	<input type="checkbox"/>	<input type="checkbox"/>		
4. Conflict of Interest Policy	<input type="checkbox"/>	<input type="checkbox"/>		
5. Active in Program	<input type="checkbox"/>	<input type="checkbox"/>		
6. Productive Relationship with Director/Coordinator	<input type="checkbox"/>	<input type="checkbox"/>		
7. Regularly Scheduled Meetings	<input type="checkbox"/>	<input type="checkbox"/>		
8. Meeting Minutes (provide minutes from 2 meetings)	<input type="checkbox"/>	<input type="checkbox"/>		
9. Quorum at All Meetings	<input type="checkbox"/>	<input type="checkbox"/>		
10. Approve Budget	<input type="checkbox"/>	<input type="checkbox"/>		
11. Authorize Expenditures	<input type="checkbox"/>	<input type="checkbox"/>		
12. Notify CVSD if there is a Change in Exe. Director.	<input type="checkbox"/>	<input type="checkbox"/>		
13. Training	<input type="checkbox"/>	<input type="checkbox"/>		

2. Personnel

Attribute	Yes	No	Comments	Action
1. Culturally Representative	<input type="checkbox"/>	<input type="checkbox"/>		
2. Orientation Training	<input type="checkbox"/>	<input type="checkbox"/>		
3. Ongoing Staff Development	<input type="checkbox"/>	<input type="checkbox"/>		
4. Grant-funded staff have read and understand grant materials <ul style="list-style-type: none"> • Informed on goals/object/PM? • Tracking for reporting? • Understand fund specific requirements 	<input type="checkbox"/>	<input type="checkbox"/>		
5. Staff Change <ul style="list-style-type: none"> • Are all grant funded positions currently filled • Have there been gaps in any grant funded positions during grant period. 	<input type="checkbox"/>	<input type="checkbox"/>		
6. High Turnover Rate	<input type="checkbox"/>	<input type="checkbox"/>		

3. Volunteers:				
Attribute	Yes	No	Comments	Action
1. Recruitment	<input type="checkbox"/>	<input type="checkbox"/>		
2. Basic Training/Orientation	<input type="checkbox"/>	<input type="checkbox"/>		
3. On-Going Training	<input type="checkbox"/>	<input type="checkbox"/>		
4. Supervision • If VAWA funds support a Vol. Coordinator, volunteer statistics must be reported on Muskie.	<input type="checkbox"/>	<input type="checkbox"/>		
5. Culturally Representative	<input type="checkbox"/>	<input type="checkbox"/>		
6. Workload Reasonable	<input type="checkbox"/>	<input type="checkbox"/>		
7. High Turnover Rate	<input type="checkbox"/>	<input type="checkbox"/>		
8. Interns	<input type="checkbox"/>	<input type="checkbox"/>		

4. Community Partnerships:				
Attribute	Yes	No	Comments	Action
1. Law Enforcement	<input type="checkbox"/>	<input type="checkbox"/>		
2. Social Service Agencies	<input type="checkbox"/>	<input type="checkbox"/>		
3. Multi-Disciplinary Team	<input type="checkbox"/>	<input type="checkbox"/>		
4. Elder Abuse Task Force	<input type="checkbox"/>	<input type="checkbox"/>		
5. Family Violence/DV Council or DART/DVERT	<input type="checkbox"/>	<input type="checkbox"/>		
6. Sexual Assault Task Force/SART	<input type="checkbox"/>	<input type="checkbox"/>		
7. Underserved, Marginalized, and/or Oppressed Communities/Groups • Outreach	<input type="checkbox"/>	<input type="checkbox"/>		
8. Tribal Nations • formal agreements vs informal collaborations • funds given to Tribal nations vice versa • clear understanding of the relationship and responsibilities.	<input type="checkbox"/>	<input type="checkbox"/>		
9. District Attorney based VAP	<input type="checkbox"/>	<input type="checkbox"/>		
10. CVRW & DV/SA/CAA Month Participation	<input type="checkbox"/>	<input type="checkbox"/>		

B. AGENCY INFRASTRUCTURE

1. Recent documents reviewed by CVSD Staff:

Document	Date	Comment	Action
Organizational Chart			
Staff Roster			
Annual Budget			
Annual Revenue Summary			
*990			

3. Planning, Policy & Procedures (View All): First three are really best practice. Having a separate policy and volunteer manual for VAP is also a best practice.

Attribute	Yes	No	Comments	Action
1. Mission Statement	<input type="checkbox"/>	<input type="checkbox"/>		
2. Strategic Plan	<input type="checkbox"/>	<input type="checkbox"/>		
3. Cultural Competency Plan/Training	<input type="checkbox"/>	<input type="checkbox"/>		
4. Agency Policy & Procedure Manual	<input type="checkbox"/>	<input type="checkbox"/>		
5. Volunteers Policy & Procedure Manual	<input type="checkbox"/>	<input type="checkbox"/>		
6. Grievance Policy (Staff & Clients)	<input type="checkbox"/>	<input type="checkbox"/>		
7. Confidentiality/Release of Information Policies	<input type="checkbox"/>	<input type="checkbox"/>		
8. CVCP Procedures/Policies	<input type="checkbox"/>	<input type="checkbox"/>		
9. Criminal History Verification Policy (Grant agreement requires a policy be in place) • What is the process for staff versus volunteers	<input type="checkbox"/>	<input type="checkbox"/>		
10. *Policies of Equal Opportunity Employer posted at all worksites (i.e. Non-Discrimination, Drug-Free Workplace)	<input type="checkbox"/>	<input type="checkbox"/>		
11. Agency Brochure	<input type="checkbox"/>	<input type="checkbox"/>		

4. Contracts & Memorandum of Understanding (MOU)

- This only refers to subcontracts and MOU's using CVSD grant funds.
- Meet or at minimum have a phone conversation with MOU partners (coordinated project activities w/out grant funds)
- Subgrantee must assure that subcontractor is held to same federal requirements as subgrantee (consultant fees, perdiem rates, etc.). The subgrantee is responsible for monitoring the subcontractor and determining that all fiscal and programmatic responsibilities are fulfilled.








A. Memorandum of Understanding (MOU)				<input type="checkbox"/> Not Applicable			
<input type="checkbox"/> ODSVS		<input type="checkbox"/> VAWA		<input type="checkbox"/> VOCA		<input type="checkbox"/> CAMI	
Attribute	Yes	No	Comments	Action			
1. Signed MOU(s) on file	<input type="checkbox"/>	<input type="checkbox"/>					
2. Does the grantee verify, through monitoring or other means, that MOU deliverables are being provided as stated in the MOU?	<input type="checkbox"/>	<input type="checkbox"/>					











B. Sub-Contracts <input type="checkbox"/> Not Applicable					
<input type="checkbox"/> ODSVS	<input type="checkbox"/> VAWA	<input type="checkbox"/> VOCA	<input type="checkbox"/> CAMI		
Attribute	Yes	No	Comments	Action	
1. Signed Subcontract(s) on file	<input type="checkbox"/>	<input type="checkbox"/>			
2. Subcontractor can describe program goals/objectives	<input type="checkbox"/>	<input type="checkbox"/>			
3. Subcontractor can describe grantee and subcontractor roles and responsibilities.	<input type="checkbox"/>	<input type="checkbox"/>			
4. Are the subcontractors performing the work described in the MOU and the subcontract?	<input type="checkbox"/>	<input type="checkbox"/>			
5. Does the grantee verify, through monitoring or other means, that contract deliverables are being provided as stated in the subcontract?	<input type="checkbox"/>	<input type="checkbox"/>			
6. Does the grantee have an established procurement procedure? • Federal guidelines apply for VAWA/VOCA grants. If no other procedures are established, federal guidelines apply.	<input type="checkbox"/>	<input type="checkbox"/>			
7. Grantee ensures that subcontract payments are not made unless receipt of goods or services is verified. • Expenditures align with subcontract agreement and budget.	<input type="checkbox"/>	<input type="checkbox"/>			
8. Grantee has documentation (invoice) supporting subcontractor request for payment.	<input type="checkbox"/>	<input type="checkbox"/>			

5. Civil Rights Compliance: Includes Equal Employment Opportunity Plan (EEO), federal non-discrimination requirements, Limited English Proficiency (LEP) requirements, and Faith Based Organization (FBO) requirements.

Each grantee is required to maintain statutorily required civil rights statistics on victims served by race, national origin, sex, age and disability (race/ethnicity, sex, and age should be maintained by victim; disability need only be maintained in aggregate). These civil rights statistics must be kept on file with other VAWA/VOCA grant documentation and must correspond with each grant period. This requirement is waived when providing a service, such as telephone counseling, where soliciting the information may be inappropriate or offensive to the crime victim.

Regulation	Yes	No	Comments/Explanation	Action
1.a. Has the agency appropriately completed the EEO section of the OCR, Certification of Compliance with Regulations (Grant Agreement Exhibit)?	<input type="checkbox"/>	<input type="checkbox"/>		

<p>1.b. If applicable, verify that the grantee submitted an EEOP certification form or an EEOP to Office for Civil Rights, Office of Justice Programs, US DOJ, Washington D.C. 20531 (Grant Agreement Exhibit).</p>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> N/A		
<p>1.c. Any pending lawsuits?</p>	<input type="checkbox"/>	<input type="checkbox"/>		
<p>2.a. Does the agency notify program participants and beneficiaries that it does not discriminate on the basis of race, color, national origin, religion, sex, disability, and age in the delivery of services? <i>Provide examples of such notification (e.g. posters, inclusion in brochures or other program materials, etc.) during site visit.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>		
<p>2.b. Does the agency notify employees that it does not discriminate on the basis of race, color, national origin, religion, sex, and disability in employment practices? <i>Provide examples of such notification (e.g. posters, dissemination of relevant policies, inclusion in recruitment materials, etc.) during site visit.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>		
<p>2.c. Does the agency have written policies or procedures in place for notifying program beneficiaries how to file complaints alleging discrimination by the agency with the CVSD and/or the OCR? <i>Provide policy during site visit.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>		
<p>3.a. If the agency has 50 or more employees and receives DOJ funding of \$25,000 or more, has the agency adopted grievance procedures that incorporate due process standards and provide for the prompt and equitable resolution of complaints alleging a violation of the DOJ regulations which prohibit discrimination on the basis of a disability in employment practices and the delivery of services? <i>Provide policy during site visit.</i></p>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> N/A		
<p>3.b. If the agency has 50 or more employees and receives DOJ funding of \$25,000 or more, has the agency designated a person to coordinate compliance with the prohibitions against disability discrimination?</p>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> N/A		

<p>3.c. If the agency has 50 or more employees and receives DOJ funding of \$25,000 or more, has the agency notified participants, beneficiaries, employees, applicants, and others that the agency does not discriminate on the basis of disability.</p>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> N/A		
<p>4.a. Has the agency complied with the requirement to submit to the OCR any findings of discrimination against the agency issued by a federal or state court or federal or state administrative agency on the grounds of race, color, religion, national origin, or sex?</p>	<input type="checkbox"/>	<input type="checkbox"/>		
<p>4.b. During the last 3 years, has a Federal or State Court or a Federal or State Administrative agency issued a finding of discrimination against the sub-grantee after a due process hearing on the grounds of race, color, national origin, age, sex, religion or disability?</p>	<input type="checkbox"/>	<input type="checkbox"/>		
<p>5.a. Has the agency taken steps to provide meaningful access to its programs and activities to persons who have limited English proficiency (LEP)?</p>	<input type="checkbox"/>	<input type="checkbox"/>		
<p>5.b. Has the agency developed a written policy on providing language access services to LEP persons?</p>	<input type="checkbox"/>	<input type="checkbox"/>		
<p>6.a. Does the agency conduct any training for its employees on the requirements under federal civil rights laws?</p>	<input type="checkbox"/>	<input type="checkbox"/>		
<p>6.b. Does the grantee need any civil rights training or technical assistance regarding its duties to comply with the applicable civil rights laws?</p>	<input type="checkbox"/>	<input type="checkbox"/>		
<p>7.a. If the agency conducts religious activities as part of its programs or services, does the agency provide services to everyone regardless of religion or religious belief?</p>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> N/A		
<p>7.b. If the agency conducts religious activities as part of its programs or services, does the agency ensure that it does not use federal funds to conduct inherently religious activities, such as prayer, religious instruction, or proselytization, and that such activities are kept separate in time or place from federally-funded activities?</p>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> N/A		
<p>7.c. If the agency conducts religious activities as part of its programs or services, does the agency ensure that participation in religious activities is voluntary for beneficiaries of federally-funded programs.</p>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> N/A		

8. Does the agency maintain statutorily required civil rights statistics on victims served by race/ethnicity, sex, gender, and age (data collection tracking reviewed in Statistical Reporting section)?	<input type="checkbox"/>	<input type="checkbox"/>		
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6. Fiscal Management (General & Grant-Specific):

Attribute	Yes	No	Comments	Action
1. Liability Insurance Coverage	<input type="checkbox"/>	<input type="checkbox"/>		
2. Formal Accounting System	<input type="checkbox"/>	<input type="checkbox"/>		
3. Understanding of Allowable Expenses for each grant fund.	<input type="checkbox"/>	<input type="checkbox"/>		
4. Expenditures & obligations coincide with grant & budget	<input type="checkbox"/>	<input type="checkbox"/>		
5. Program/Budget Amendment (redirect) & Justification Process <ul style="list-style-type: none"> • CVSD Amendment Policy • Amendments in E-Grants 	<input type="checkbox"/>	<input type="checkbox"/>		
6. Records Separate from other funding sources	<input type="checkbox"/>	<input type="checkbox"/>		
7. Records Safe/Secure	<input type="checkbox"/>	<input type="checkbox"/>		
8. Separation of Duties/checks and Balances in Place <ul style="list-style-type: none"> • Are responsibilities for supervision & time keeping, personnel, payroll processing, disbursements, and general ledger functions assigned to provide division of duties. 	<input type="checkbox"/>	<input type="checkbox"/>		
9. 2 Signature Checks Policy	<input type="checkbox"/>	<input type="checkbox"/>		
10. Retention of Records	<input type="checkbox"/>	<input type="checkbox"/>		
11. *Audit Required? (Expended \$500k or more in Federal Funds in the Past Year?)	<input type="checkbox"/>	<input type="checkbox"/>		
12. Copy of Audit Report sent to CVSD (provide website/electronic copy if possible)	<input type="checkbox"/>	<input type="checkbox"/>		
13. *Supplanting Supplementing existing funds and not replacing. This pertinent to VAWA/VOCA	<input type="checkbox"/>	<input type="checkbox"/>		

7. Equipment: Equipment means tangible non-expendable personal property including exempt property charged directly to the award having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit (2 CFR Part 215).

Attribute	Yes	No	Comments.	Action
1. Has the Agency purchased or has plans to purchase equipment under this grant.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> NA <input type="checkbox"/> ODSVS <input type="checkbox"/> VAWA <input type="checkbox"/> VOCA <input type="checkbox"/> CAMI	
2. Equipment purchases are supported with appropriate documentation (receipts)? • Receipts match the ledger • View actual equipment item	<input type="checkbox"/>	<input type="checkbox"/>		
3. Inventory Kept • USDOJ Financial guide details this.	<input type="checkbox"/>	<input type="checkbox"/>		
4. Equipment used for Victim Services only	<input type="checkbox"/>	<input type="checkbox"/>		
5. Disposition of Equipment • Federal requirement: 3 yrs for records for equipment once the item has been replaced/transferred, etc.	<input type="checkbox"/>	<input type="checkbox"/>		

C. COMPLIANCE

1. Grant Files (View any hard copy Grant Files).

How has using E-grants changed the way grant information is being organized?

Attribute	Yes	No	Comments	Action
1. Separated Grants on File	<input type="checkbox"/>	<input type="checkbox"/>		
2. Cover Sheet	<input type="checkbox"/>	<input type="checkbox"/>		
3. Grant Agreement & Amendments	<input type="checkbox"/>	<input type="checkbox"/>		
4. Current Budget & Narrative	<input type="checkbox"/>	<input type="checkbox"/>		
5. Current Project Description	<input type="checkbox"/>	<input type="checkbox"/>		
6. Current Goals & Objectives	<input type="checkbox"/>	<input type="checkbox"/>		
7. Copies of Contracts (as applicable)	<input type="checkbox"/>	<input type="checkbox"/>		
8. Copies of MOUs (as applicable)	<input type="checkbox"/>	<input type="checkbox"/>		

2. Financial Reporting (View All): This section will be completed during the site visit.

Attribute	Yes	No	Comments	Action
1. Expenditures Documented • Do expenditures require an approval by a supervisor to ensure costs are authorized, allowable and consistent w/the grant agreement? • All costs are allowable • All costs are expended in accordance with the approved budget.	<input type="checkbox"/>	<input type="checkbox"/>		

<ul style="list-style-type: none"> • Grantee is not obligating grant funds before the beginning, or after the end of the grant period. • Spending is on track. 				
2. Receipts Labeled and Filed <ul style="list-style-type: none"> • Receipts align with ledger and are filed with QFR 	<input type="checkbox"/>	<input type="checkbox"/>		
3. Mileage recorded (Grant-funded)	<input type="checkbox"/>	<input type="checkbox"/>		
4. Travel Guidelines followed <ul style="list-style-type: none"> • Reimbursement for travel does not include meals provided by conference/training. • Proof of attendance available 	<input type="checkbox"/>	<input type="checkbox"/>		
5. Timesheets/Salary Records <ul style="list-style-type: none"> • Positions partially funded by the grant clearly and accurately reflect the allocations and align with the approved budget. • Are records maintained showing hours worked for each program and approved. • Are completed payroll charges reviewed before disbursements are made. • Are confidential payroll records and reports adequately safeguarded. 	<input type="checkbox"/>	<input type="checkbox"/>		
6. Documentation of Volunteer Hours used as match <ul style="list-style-type: none"> • View the tracking system used to report volunteers hours for the previous quarter. • Volunteer time used for in-kind match is appropriately documented and not used for other match. 	<input type="checkbox"/>	<input type="checkbox"/>		
7. Volunteer Benefit Rate Reasonable <ul style="list-style-type: none"> • The rate does not exceed the \$\$ per hour rate for staff with the same responsibilities. 	<input type="checkbox"/>	<input type="checkbox"/>		
8. Source & amount of match verified for each period <ul style="list-style-type: none"> • View the tracking system for match including volunteers 	<input type="checkbox"/>	<input type="checkbox"/>		
9. Sufficient documentation of determining match (in-kind, cash)	<input type="checkbox"/>	<input type="checkbox"/>		
10. Match is not included as contribution for other federal funds	<input type="checkbox"/>	<input type="checkbox"/>		
11. Financial reports reconciled with project budget & prior grant reports (Non E-Grant question) <ul style="list-style-type: none"> • Revenue/Expenditure reports align w/project budget and the financial report 	<input type="checkbox"/>	<input type="checkbox"/>		
12. Concerns with past reports	<input type="checkbox"/>	<input type="checkbox"/>		

3. Statistical Reporting: (View All)

Attribute	Yes	No	Comments	Action
1. Understand "non-duplicated victims"	<input type="checkbox"/>	<input type="checkbox"/>		
2. Understand service definitions	<input type="checkbox"/>	<input type="checkbox"/>		
3. Understand volunteer hour reporting	<input type="checkbox"/>	<input type="checkbox"/>		

4. Statistical record-keeping	<input type="checkbox"/>	<input type="checkbox"/>		
5. Documentation kept with each report	<input type="checkbox"/>	<input type="checkbox"/>		
6. *Civil Rights data collection • View tracking of this information	<input type="checkbox"/>	<input type="checkbox"/>		
7. Concerns with past reports	<input type="checkbox"/>	<input type="checkbox"/>		

4. Narrative Reporting:

Attribute	Yes	No	Comments	Action
1. Understand Outputs & Outcomes	<input type="checkbox"/>	<input type="checkbox"/>		
2. Concerns with past reports	<input type="checkbox"/>	<input type="checkbox"/>		

5. Common Outcome Reporting:

Attribute	Yes	No	Comments	Action
1. Correct outcomes being tracked	<input type="checkbox"/>	<input type="checkbox"/>		
2. Correct 5-point scale being used	<input type="checkbox"/>	<input type="checkbox"/>		
3. Procedure for distribution/return	<input type="checkbox"/>	<input type="checkbox"/>		
4. Procedure for feedback	<input type="checkbox"/>	<input type="checkbox"/>		
5. Concern with past reports	<input type="checkbox"/>	<input type="checkbox"/>		

D. Materials to Bring to Visit: Identify type of materials and quantity.

VINES			
CVCP			
Crime Victim Rights Materials			
ACP			

Site Visit Notes (for CVSD use only)

Staff met with: [redacted]

Program Strengths: [redacted]

Program weaknesses, problems, areas of concern or areas of non-compliance: [redacted]

Corrective action needed or taken to address above issues: [redacted]

Follow-up needed: [redacted]

See site visit summary: DM # [redacted]