

**Oregon Department of Justice
Crime Victim & Survivor Services Division**

Grant Monitoring Policy



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SECTION 1 INTRODUCTION TO MONITORING POLICY

This monitoring plan was written in compliance with the Office of Victims of Crime (OVC) and the Office on Violence Against Women (OVW) requirement that State Administrative Agencies (SAA) develop and implement a monitoring plan based on a default of regular desk monitoring, and biennial on-site monitoring, of all subawards. The monitoring plan must include a risk assessment plan. The rule, consistent with 2 CFR §200.331 (b), (d) and (e), permits SAAs to develop and implement alternative monitoring plans and further clarifies that SAAs may also implement alternative monitoring timeframes as well.

The Oregon Department of Justice (DOJ) is the designated SAA for Child Abuse Multidisciplinary Intervention (CAMI), Criminal Fine Account (CFA), Oregon Domestic and Sexual Violence Services (ODSVS), Sexual Assault Services Program (SASP), STOP Violence Against Women Act Fund (VAWA), and Victims of Crime Act (VOCA) Grants. These funds are derived from state and federal sources, and this policy includes monitoring requirements from those sources.

CVSSD monitors subrecipient awards for compliance with applicable federal and state guidelines, and to determine if subrecipients are providing services outlined in their grant applications and in accordance with the CVSSD Grant Agreement, established program policies and procedures, and the Grant Management Handbook. CVSSD accomplishes monitoring objectives through a variety of techniques, including risk assessments, reviewing reports, reviewing policies, conducting telephone interviews, and in-person visits to subrecipient agencies.

CVSSD Fund Coordinators are available to assist subrecipients in implementing approved projects within a framework of relevant state and federal statutes, regulations, policies, procedures, and guidelines to achieve maximum success. To be effective, it is imperative that the monitoring process occurs throughout the course of the award period, and coincides with technical assistance.

Through proactive monitoring, CVSSD Fund Coordinators will:

- Ensure that fiscal accountability and programmatic integrity are maintained;
- Ensure that projects initiated by subrecipients are carried out in a manner consistent with the subrecipient's stated implementation plan;
- Identify and resolve problems that may impede effective project implementation;
- Collect data to provide comprehensive fiscal information and specified progress reports to the federal or state granting agency; and,
- Provide consultation and technical assistance to the subrecipient.

If a project is underperforming per stated objectives or established guidelines, CVSSD Fund Coordinators can assist in making adjustments and improvements. By monitoring projects, CVSSD not only helps identify technical assistance issues, but demonstrates good stewardship of federal and state funds, and fulfills the responsibilities required of state administering agencies.

This policy establishes criteria to prioritize in-person visits and desk reviews of the CVSSD funding awards. Priority is given to subrecipients where problems have been identified, implementation has been difficult, or the subrecipient has specifically requested technical assistance.

Monitoring Components

CVSSD will conduct four levels of program and fiscal monitoring. The timing of the monitoring may be dependent on your Risk Assessment scores and ranking, or may be prompted by concerns within the agency, either as reported to the grant monitor by the agency or other parties. Every subrecipient will receive pre-award and ongoing post-award monitoring that includes the following components:

1. **Risk Assessment:** All subrecipients will complete an Administrative Risk Assessment and a Financial Risk Assessment. Assessments must be completed with each application of assigned primary CVSSD funding stream, prior to finalizing grant agreements.
2. **Policies & Procedures Review:** All subrecipients will receive an Administrative Policies & Procedures Review and a Financial Policies & Procedures Review at least once every grant cycle. Subrecipients who are categorized as High Risk will receive Policies & Procedures Reviews within the first few quarters of the most recent grant award.
3. **Financial Report Verification:** All subrecipients will receive a Financial Report Verification at least once during a two year grant award. Subrecipients who are categorized as High Risk will receive a Financial Report Verification within the first few quarters of the most recent grant award.
4. **On-Site Programmatic Review:** All subrecipients will receive an On-Site Programmatic Review. All non-competitive subrecipients will have a minimum of one on-site review every 4 years. Competitive-only or one-time subrecipients will have an on-site review as necessitated by their risk assessment score or as designated by the Fund Coordinator.

Please refer to Appendix A for a copy of the CVSSD Grant Monitoring Process flow chart.

Every Subrecipient will receive pre-award and ongoing post-award monitoring that includes the following:

1. Completion of Administrative and Financial Risk Assessments with each non-competitive or, as appropriate, competitive grant application.
2. Detailed review of agency or victim services budget, project budget, performance measures, staff roster and Board roster during the application process.
3. Review of legal documents, as appropriate, during the application process: organization or victim services balance sheet, IRS Form 990, IRS Determination Letter, Articles of Incorporation, and Board Bylaws.
4. Quarterly detailed review of Financial Request(s) and Progress Report(s).
5. Follow up and technical assistance by phone and/or email for any issues identified during any monitoring step.

SECTION 2 RISK ASSESSMENT

A. Risk Assessment Overview

Completing Risk Assessments in conjunction with the grant application creates a proactive system to ensure programmatic and fiscal success of all subrecipients. It is an acknowledgement that some may need additional assistance to implement an effective project and remain in compliance with federal regulations. The assignment of risk can change throughout the grant period, depending on changing circumstances. The risk assessment should not be viewed as pejorative or punitive system, but as a tool to create a high functioning program. This risk assessment will indicate the urgency of which an on-site visit is necessary or if less intensive scrutiny would suffice.

The Administrative and Financial Risk Assessments:

1. Completed every two years with assigned primary CVSSD funding stream (may be 3 years for competitive grants).
2. Administrative and financial risk classifications are assigned after the completion of each risk assessment.
3. Administrative and financial risk classifications will determine the level and frequency of post-award monitoring.
4. The outcome of the administrative and financial risk assessments may result in Special Conditions on the Grant Agreement(s).

B. Processing Risk Assessments

Subrecipients will complete an Administrative Risk Assessment and a Financial Risk Assessment as follows:

1. CVSSD Fund Coordinators email Risk Assessments to the subrecipient;
2. The subrecipient completes both Risk Assessments and submits them to their Fund Coordinator via email;
3. Fund Coordinators reviews the assessments, discuss results with subrecipients by phone, as needed, and adds comments;
4. Once finalized by mutual agreement between subrecipient and their Fund Coordinator, the Fund Coordinator uploads the Risk Assessments in E-Grants.

Note: Completion of Risk Assessment process will be required prior to finalizing the grant agreement.

C. Tiers of Administrative Risk

Low Risk - Subrecipient is scheduled for the following:

Administrative Policies and Procedures Reviews: once every 4 years
On-Site Programmatic Review: once every 4 years

Moderate Risk - Subrecipient is scheduled for the following:

Administrative Policies and Procedures Reviews: within 12-18 months
On-Site Programmatic Review: within 2 years

High Risk - Subrecipient is scheduled for the following:

Administrative Policies and Procedures Reviews: within 6-12 months
On-Site Programmatic Review: within 1 year

D. Tiers Financial Risk

Low Risk - Subrecipient is scheduled for the following:

Financial Policies and Procedures Review: once every 4 years
Financial Report(s) Verification: once every grants cycle

Moderate Risk - Subrecipient is scheduled for the following:

Financial Policies and Procedures Review: within 12-18 months
Financial Report(s) Verification: within 1 year (may be repeated per Fund Coordinator discretion)

High Risk - Subrecipient is scheduled for the following:

Financial Policies and Procedures Review: within 6-12 months
Financial Report(s) Verification: within 6 months (may be repeated per Fund Coordinator discretion)

SECTION 3 POLICIES AND PROCEDURES REVIEW

A. Policies and Procedures Review Objectives

Awards are subject to conditions of fiscal, programmatic, and general administration to which the recipient expressly agrees in accepting the award. It is CVSSD's expectation that all agencies scheduled for a Policies & Procedures Review will be prepared and have available all the information requested when the review is arranged. Additional documentation may be requested at the time of the review. Failure to cooperate fully with the review process will result in written documentation of the agency's lack of compliance.

The Policies and Procedures Review may include an examination of records across all open grant awards.

B. Financial Policies and Procedures Review

The objective of the Financial Policies and Procedures Review is to review the subrecipient's administration of funds and any required non-Federal contributions for the purpose of determining whether the recipient has an established accounting system integrated with adequate internal fiscal and management controls to provide full accountability for revenues, expenditures, assets, and liabilities. This system should provide reasonable assurance that the organization is managing federally funded programs in compliance with applicable laws and regulations.

In order to complete a Financial Policy and Procedure Review: the following items are examples of what the Fund Coordinator will be looking for in the review:

1. CVSD grant staff will email Subrecipient a Financial Policies & Procedures Review notification letter no less than 30 calendar days before the end of the current reporting period.

2. Subrecipients will be instructed to submit a series of documents that verify the Financial Self-Assessment and demonstrate compliance with grant requirements.
3. CVSSD Fund Coordinator will review the submitted documents and ask for further documents or explanations as needed. A phone interview may be arranged to supplement the review.
4. After thorough review of the supporting documents, your CVSSD Fund Coordinator will either:
 1. Request a follow-up plan to meet grant requirements.
OR
 2. Submitted documents will be kept on file as part of the subaward record for six years following the termination of the agreement.

C. Administrative Policies and Procedures Review

The following are general steps that will be followed for an Administrative Policies & Procedures Review. These steps are subject to change during the review process based on findings that may arise.

1. CVSSD grant staff will email an Administrative Policies & Procedures Review notification letter no less than 30 calendar days before the end of the current reporting period.
2. Subrecipients will be instructed to submit a series of documents that verify the Administrative Self-Assessment and demonstrate compliance with grant requirements.
3. CVSSD Fund Coordinators will review the submitted documents and ask for further documents or explanations as needed. A phone interview may be arranged to supplement the review.
4. After thorough review of the supporting documents submitted, CVSSD Fund Coordinators will either:
 1. Request a follow-up plan to meet grant requirements.
OR
 2. Approve the Administrative Policies & Procedures Review.

SECTION 4 FINANCIAL REPORT VERIFICATION

Approximately 30 calendar days prior to the end of the reporting period, you will receive a letter from your CVSSD Fund Coordinator notifying you of an upcoming Financial Report Verification. All subrecipients will receive a Financial Report Verification; however the verification may be prompted sooner based on the results of your Risk Assessment. Subrecipients who are categorized as High Risk will receive a Financial Report Verification within the first 4 quarters of the most recent grant award.

A. Steps for a Fiscal Report Verification:

The following are general steps that will be followed for a Fiscal Review. These steps are subject to change during the review process based on findings that may arise.

1. CVSSD grant staff will email a Fiscal Review notification letter no less than 30 calendar days before the end of the current reporting period.
2. Subrecipients will be instructed to initiate a quarterly financial report and upload in the attachments section, a copy of their General Ledger for the current reporting period for each open grant award.

3. CVSSD Fund Coordinators will review the General Ledger(s) to determine which supporting documents are needed for review. The supporting documents requested will be from at least one open grant award, but may be from up to all open grant awards. Documents may include, but are not limited to: check stubs, cancelled checks, timesheets, invoices, procurement documentation, and any other evidence to support grant expenditures. You may be asked for additional documentation at any time during this review process. This request will be communicated in the Modifications section in your quarterly financial report in E-Grants.
4. After thorough review of the supporting documents submitted, CVSSD Fund Coordinators will either:
 1. Request supporting documentation and or narrative to support the documentation submitted.
OR
 2. Approve the Fiscal Review and prompting you to complete your Financial Report and submit.

B. Important information regarding uploading documents for Financial Report Verification

In order to expedite the Financial Report Verification process, it is imperative that you follow the guidelines outlined in your notification letter and communication in the modifications section of the financial report. All communication and sharing of supporting documents will take place in the modifications page of your Financial Report in E-Grants, unless otherwise requested by your CVSSD Fund Coordinator.

C. Timing of the Fiscal Review

Your CVSSD Fund Coordinator will ask you to upload your general ledger when you initiate your quarterly financial report. Your quarterly financial report will not be approved until the completion of the Financial Report Verification process. This means that your quarterly payment will be held until the completion of the verification. Therefore it is in your best interest to initiate the Financial Report Verification process immediately upon receipt of your notification letter.

SECTION 5 ON-SITE PROGRAMMATIC REVIEW
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A. Overview

An On-Site Programmatic Review visit may be prompted by one or more of the following: routine time for a visit based on your risk assessment score, concerns within the agency, either as reported to the grant monitor by the agency or other parties, and or a request for a site visit by the subrecipient. Prior to the scheduled, on-site visit, CVSSD grant staff may convene a structured telephone interview with the director or project manager.

B. Pre On- Site Programmatic Review Visit Actions

CVSSD Fund Coordinators will contact Program Directors to arrange dates and times for the phone interview and the On-Site Programmatic Review Visit. Anticipate up to 2 hours for the phone interview and 3 ½ to 4 hours for the in-person site visit. Larger, more complex programs, programs with multiple

grants, and/or programs with problems may warrant longer visits. Senior management, financial, business, accounting, and program officials should be available for discussions, as needed.

The telephone meeting and in-person site visit will include a review of the following:

- Program administration;
- Program services delivery;
- Systems and controls;
- Intake, safety, and confidentiality;
- Outcome measures, grievance procedures, and evaluation;
- Governing body, staffing, volunteers;
- Community relations, partnerships, and outreach;
- Compliance with federal and state regulations/guidelines as appropriate.

Prior to the visit, your CVSSD Fund Coordinator will provide you with a copy of the site monitoring instrument, as well as a list of items to have available for review. In most instances, the Fund Coordinator will provide you with a list of documents to be sent via email for review prior to the on-site visit.

C. On- Site Programmatic Review Visit Expectations

1. The on-site monitoring review will start with an entrance conference. It is expected that the project director and fiscal director will be present during this time. The chairperson of the governing board or designee, and authorized official are also encouraged to attend this meeting. The CVSSD Fund Coordinator will explain the review process and the monitoring schedule. The project director should make sure that all requested information is available before the review.
2. The project director and fiscal director should be available during the entire review related to their responsibilities. The CVSSD Fund Coordinator will require explanation of supporting documents supplied by the agency. Additional information will be needed during most reviews. Equipment and other purchases through the grant should also be made available for inspection when possible by the agency.
3. All grant funded staff should also be available for interviews by the CVSSD Fund Coordinator. The coordinator has the prerogative to interview staff in private. This may include grant funded staff and other agency staff associated with the grant. The monitor may elect to do telephone interviews with staff in field offices, when applicable.
4. An exit conference will be held at the end of the review. Again, the project director and fiscal director should be available at the exit conference. The board chairperson or designee and authorized official are encouraged to attend. The CVSSD Fund Coordinator will discuss any known findings and/or observations and a preliminary corrective action plan submission procedure at this time.

It is CVSSD's expectation that all agencies scheduled for a monitoring visit will be prepared and have available all the information requested when the visit is arranged. Additional documentation may be requested at the time of the review. Failure to cooperate fully with the monitoring process will result in written documentation of the agency's lack of compliance.

SECTION 6 MONITORING OUTCOMES

A. Overview

Subrecipient will be kept informed of all findings throughout the monitoring process. This is an opportunity to ask questions and request technical assistance. Within thirty (30) business days following the review, the CVSSD Fund Coordinator will provide the subrecipient with a completed copy of the monitoring report with written summary of the findings, to include strengths and areas of concern. A copy will be uploaded into E-Grants to become part of the grant record.

The monitoring report will include one of the following possible responses:

1. **Satisfactory Compliance:** No findings of noncompliance means that the monitoring did not identify any areas, either programmatic or fiscal, that did not comply with the specific criteria found in relevant state or Federal statutes, rules or regulations, Grant Agreements, *Grant Management Handbooks*, or good business practice.
2. **Observations:** During the monitoring process, a situation was observed that is deemed to be a potential problem and worthy of documentation and attention, but is not a finding of noncompliance.
3. **Findings of programmatic and or financial noncompliance** means that the monitoring identified programmatic and or financial areas that did not comply with the specific criteria found in relevant state or Federal statutes, rules or regulations, Grant Agreements, *Grant Management Handbooks*, or good business practice. CVSSD Fund Coordinator will include in the summary of findings, any special conditions and timelines for corrective action.

B. Failure to Comply with the Terms and Conditions of a CVSSD Grant

If a subrecipient significantly fails to comply with the terms and conditions of a grant agreement, including civil rights requirements, whether stated in a federal statute, regulation, assurance application or notice of award, DOJ CVSSD may take one of more of the following actions, as appropriate per the circumstance:

- Temporarily withhold cash payments pending correction of the deficiency by the subrecipient;
- Disallow (that is, deny both use of funds and any applicable matching credit) for all or part of the cost of the activity or action not in compliance;
- Completely or partially suspend or terminate the current grant;
- Withhold further grants for the agency or program;
- Reclaim funding from a subrecipient if misappropriations occur; and
- Take other remedies that may be legally available.

DOJ CVSSD may, after reasonable notice, terminate or suspend funding for a subrecipient organization that fails to conform to the requirements or objectives of the grant funding, and/or that fails to comply substantially with the DOJ CVSSD grant agreement. In that event, the subrecipient shall be entitled to

receive equitable compensation for satisfactory, authorized services completed as of the termination date.

If the subrecipient fails to fulfill its grant obligation in a timely manner, DOJ CVSSD shall have the right to immediately terminate or suspend the grant and withhold payments in excess of fair compensation for completed services. Notwithstanding the above, the subrecipient shall not be relieved of liability to DOJ CVSSD for damages sustained by virtue of any breach of the grant agreement by the subrecipient.

It is left to the discretion of DOJ CVSSD to determine what course of action will be taken, and what extent other grant funds may be affected, as a result of failing to comply with the terms and conditions of any awarded grant. For example, if something is only a violation of a VOCA specific policy, other funding may or may not be in jeopardy, but if there is financial mismanagement, presumably all funds could be at risk.

While termination of the funding will not be exercised without prior written notice to the subrecipient, any consideration of future grant requests may be influenced by the gravity and extent of the irregularities causing termination as determined by DOJ CVSSD. Failure by a subrecipient to comply with the terms of the grant agreement or of the requirement described in the Grant Management Handbook may be considered grounds for termination of the subrecipient funding.

In the event of a formal allegation or a finding of fraud, waste, or abuse of funds, DOJ CVSSD must be immediately notified. Suspension or termination of funds may be lifted when the grant recipient organization has demonstrated substantial compliance. Termination or suspension action will only be taken as a last resort. The staff of DOJ CVSSD is committed to assisting subrecipients to realize the success of any given grant and will utilize all reasonable means to resolve problems or address potentially critical issues. Whenever possible, and in the best interest of victims, assistance will be provided to subrecipient agencies to prevent such actions.

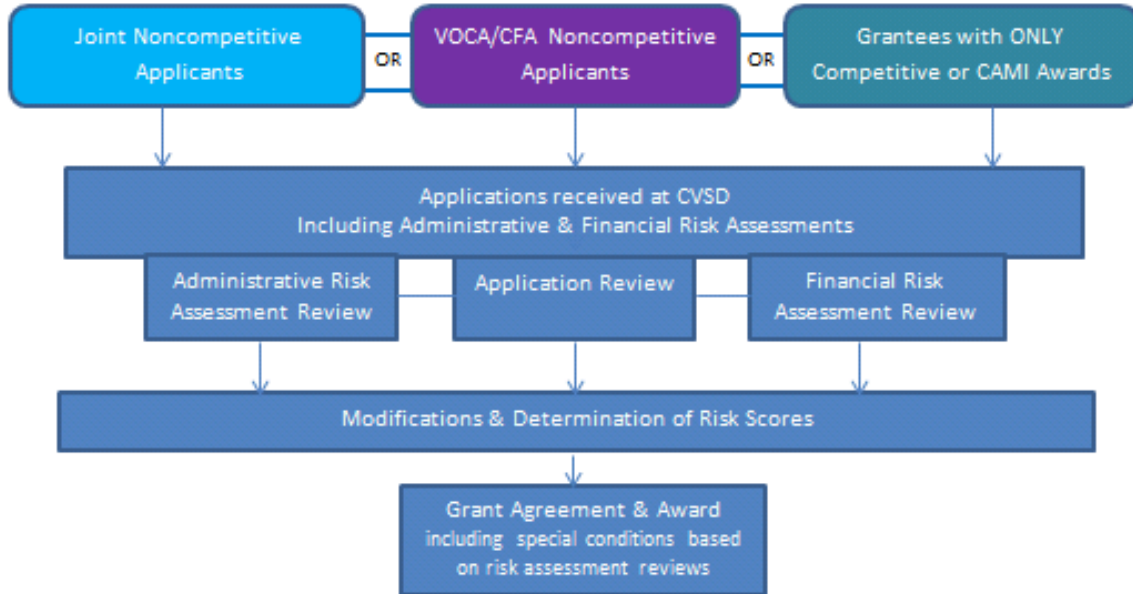
SECTION 7 RECORD KEEPING & DOCUMENTATION

Each subrecipient is responsible for keeping records documenting the amount and disposition of the proceeds of the grant. This includes financial documentation for disbursements, daily time/ attendance records specifying time devoted to grant allowable victim services, the portion of the grant supplied by other sources of revenue, program income, job descriptions, contracts for services, receipts and other records which facilitate an effective site visit or desk review.

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 each 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).

APPENDIX A: MONITORING PROCESS

CVSSD Grant Monitoring Process



Proposed Schedule							
	<i>Early in year one:</i>	<i>Later in Year One:</i>	<i>Once every 4 years:</i>		<i>Early in year one:</i>	<i>Later in Year One:</i>	<i>At least once every grant cycle:</i>
Year One Quarters 1-4	Administrative Policies & Procedures Review On-site Programmatic Review	Administrative Policies & Procedures Review	Administrative Policies & Procedures Review On-Site Programmatic Review		Financial Policies & Procedures Review Financial Report Verification	Financial Policies & Procedures Review Financial Report Verification	Financial Report Verification* <i>Once every 4 years:</i> Financial Policies & Procedures Review
Year Two Quarters 5-8	Follow-Up	On-site Programmatic Review**			Financial Report Verification	Financial Report Verification*	
* A second Financial Report Verification may be requested at the discretion of the fund coordinator.							
** An On-site Programmatic Review may be scheduled at the discretion of the fund coordinator.							

APPENDIX B: DOCUMENTS FOR ADMINISTRATIVE & FISCAL REVIEW

Below is an example of documents that will be requested during the CVSSD monitoring process. This is not an all-inclusive list. Additional documents may be requested as determined by the fund coordinator.

Documents for Administrative/Fiscal Review

Grantee: Date:

Available in E-Grants:

Yes N/A

- By-Laws
- Indirect Cost Rate
- Criminal History Verification
- Confidentiality and ROI
- Common Outcome Measure Procedures
- Job Descriptions (staff and volunteer)
- CFA Procedures for Core Services
- MOU
- Subcontract(s)
- IRS Form 990
- Audit
- IRS Determination Letter

COMMENTS:

Send in Advance:

Yes N/A

- Conflict of Interest (BOD, staff)
- Board meeting minutes (2 in prior 12 months)
- Travel Policy
- Procurement Policy & Procedures
- Equipment and Property Policy (include Inventory and Maintenance Policies)
- Vehicle Policy
- Grievance Policy (staff, volunteers and clients)
- Records Retention Policy
- Personnel Policies & Procedures and/or Employee Handbook (include Staff Development Policy, Confidentiality/ROI, Criminal History Verification)
- Volunteer Policies & Procedures
- Fiscal Policies & Procedures (include internal control systems, security policies, records retention, donations and gifts)
- Whistleblower Policy

COMMENTS:

Available On-Site:

Yes N/A

- Mission Statement
- Examples of 2 property records
- Examples of 2 inventory records
- Insurance policies
- Vehicle usage records
- EEOP
- Disability Discrimination Policy (if > 50 employees)
- LEP Policy
- Organization chart
- Outreach materials

COMMENTS: