

OREGON DEPARTMENT OF JUSTICE

VICTIMS OF CRIME ACT (VOCA) SUBAWARD HANDBOOK

FOR

VOCA SUB-RECIPIENTS



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The Victims of Crime Act (VOCA) Subaward Management Handbook discusses general program requirements and restrictions relating to the administration of all federal VOCA Assistance subawards funded through the Oregon Department of Justice (DOJ), Crime Victim and Survivor Services Division (CVSSD). It is expected that this Handbook will provide a ready resource for agencies in the process of applying for a VOCA Subaward, as well as, providing subaward recipients with a resource throughout the subaward period. The VOCA Subaward Handbook is available in the following formats:

- Downloadable in PDF format on the Department of Justice (DOJ) Crime Victim and Survivor Services (CVSSD) website at: <https://www.doj.state.or.us/crime-victims/grant-funds-programs/victims-of-crime-act-voca-assistance-fund/>.
- E-mail



**For more information, please contact your fund coordinator.
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SECTION 1

INTRODUCTION TO VOCA GUIDELINES

I. VOCA

The Victims of Crime Act was passed by Congress and signed into law by President Reagan on October 12, 1984. The Act serves as the central source of federal financial support for direct services to victims of crime. VOCA is administered at the federal level through the United States Department of Justice, Office for Victims of Crime, which annually awards a grant to each state, the District of Columbia and the United States Territories. Those agencies, in turn, **subaward** to organizations that provide direct service to victims of crime. The recipients of these subawards are referred to as **sub-recipients**. The money for these grants comes from the Crime Victims Fund, a special fund into which fines, penalty assessments, bond forfeitures collected from convicted federal offenders and certain other collections are deposited; taxpayers do not fund VOCA grants.

Prior to FY 2000, all of the money deposited into the Crime Victims Fund was allocated the following fiscal year according to a formula in the Victims of Crime Act (VOCA) statute. Beginning in FY 2000, Congress capped the annual obligations from the VOCA Fund to ensure “stable funding” in future years; this resulted in cuts to victim services as the new formula was implemented. The Crime Victims Fund Preservation Act of 2009 (S.1340 and H.R. 3402), bipartisan companion bills, established a minimum funding level for VOCA programs and increased the cap by 23% each year for fiscal years through 2014. The minimum VOCA cap in the bills was to ensure a reasonable growth in victim programs without jeopardizing the long-term sustainability of the Crime Victims Fund. The *Consolidated Appropriations Act of 2010* included a \$705 million cap on obligations from the Crime Victims Fund, an increase of \$70 million over the FY 2009 cap. Congress maintained this VOCA cap through FY 2014. Due to the settlement of a handful of very large cases, deposits into the Fund escalated at unprecedented levels. As a result of a broad national campaign to increase the cap on the Crime Victims Fund, Congress increased the VOCA cap in FY 2015 to \$2.361 billion. In FY 2018 the VOCA cap was set at \$4.436 billion.

If you would like to read more about the VOCA Crime Victims fund visit the Office for Victims of Crime (OVC) website at www.ovc.gov/about/victimsfund.html.

Each state designates an agency to administer VOCA subawards. While federal requirements must be met, each state is given discretion in awarding specific subawards. The Oregon Department of Justice (DOJ) is the designated agency for the administration of VOCA funds in the State of Oregon and is referred to as the State Administering Agency (SAA). Supported by a multidisciplinary advisory committee, the Crime Victim and Survivor Services Division (CVSSD) of the Oregon Department of Justice has specific program responsibility for VOCA and the programs it funds across the state.



The primary purpose of the VOCA victim assistance grant program is to extend and enhance services to victims of crime.

II. THE PURPOSE OF VOCA SUBAWARDS

The primary purpose of the VOCA victim assistance subaward program is to extend and enhance services to victims of crime. VOCA defines crime victim as a person who has suffered physical, sexual, financial or emotional harm as a result of the commission of a crime. VOCA awards support the provision of direct services to victims of crime throughout the United States. Research has shown that if victims receive early intervention, the need for long-term treatment dramatically decreases.

III. DIRECT VICTIM SERVICES

Direct services to victims of crime are described in 42 U.S.C. 10603(d)(2) and include:

- crisis intervention services;
- providing, in an emergency, transportation to court, short-term child care services, and temporary housing and security measures;
- assistance in participating in criminal justice proceedings; and
- payment of all reasonable costs for a forensic medical examination of a crime victim, to the extent that such costs are otherwise not reimbursed or paid;
- Responding to the emotional, psychological, or physical needs of crime victims;
- Assisting victims to stabilize their lives after victimization;
- Assisting victims to understand and participate in the criminal justice system; or
- Restoring a measure of security and safety for the victim.

Please review the [VOCA Allowable and Unallowable Costs and Services](#) document for specific information about allowable and unallowable services and activities.

IV. VOCA ELIGIBILITY REQUIREMENTS

VOCA has clearly established eligibility criteria that must be met by all organizations receiving VOCA funds. In addition, **all sub-recipient programs must follow any additional criteria or reporting requirements established by DOJ CVSSD any time during the subaward period.** All eligibility criteria listed below is further described and explained in Section 3: pages 7-24.

Federal Eligibility Requirements

A victim assistance program is eligible to receive VOCA funds if it is operated by a public agency or a nonprofit organization, or a combination of such programs, and provides services to victims of crime. Programs must:

- Demonstrate a record of effective services
- Meet program match requirements
- Use volunteers
- Promote coordinated efforts to help crime victims
- Help victims apply for crime victim compensation
- Provide services free of charge
- Not discriminate
- Provide services regardless of immigration status
- Protect victim confidentiality and privacy
- Provide services regardless of victim's participation in criminal justice system
- Provide services to victims of federal crime
- Keep research information confidential
- Maintain civil rights information
- Comply with Federal Funding Accountability Act (FFATA)
- Provide proof of DUNS number and SAM registration
- Meet terms of certified assurances and other federal rules

V.CVSSD Eligibility Requirements:

- Demonstrate **access** to effective services;
- Maintain **good fiscal management**;
- Comply with financial, data and outcome **reporting**;
- Provide **culturally responsive and accessible services**; and
- Comply with **training** requirements.

PLEASE NOTE:

Eligible programs are not limited to entities whose sole purpose is to provide direct services. There are special considerations for the entities described below:

1. *Faith-based and neighborhood programs.* VOCA funds may be awarded to otherwise eligible faith-based and neighborhood programs, but such programs must ensure that services are offered to all crime victims without regard to religious affiliation and that the receipt of services is not contingent upon participation in a religious activity or event.
2. *Victim service organizations located in an adjacent state.* SAAs may award VOCA funds to otherwise eligible programs that are physically located in an adjacent State. In making such awards, the SAA shall provide notice of the award to the SAA of the adjacent State, and coordinate, as appropriate, to ensure effective provision of services, monitoring, auditing of federal funds, compliance, and reporting.

SECTION 2

VOCA SUBAWARD APPLICATION PROCESS

I. TARGET POPULATIONS TO BE SERVED

The Victims of Crime Act of 1984 requires each state to certify that priority will be given to programs serving specific categories of crime victims. VOCA requires ten percent (10%) of funds available to Oregon for VOCA subawards be allocated to each of the following priority categories:

- **Domestic Violence**
- **Sexual Assault**
- **Child Abuse**
- **Underserved Victims of *Violent Crime*** based on type of crime, characteristics of the victim, or both. Examples of victim populations that are often underserved may include, but are not limited to:
 - Victims with disabilities;
 - Survivors of homicide victims;
 - Victims of gang violence;
 - Victims of hate/bias crime;
 - Victims of sex trafficking;
 - Victims of elder abuse;
 - Victims of impaired drivers;
 - Victims with Limited-English speaking skills;
 - Members of racial, cultural or ethnic minorities;
 - Victims who identify as LGBTQ +; and
 - Other (an applicant may identify a particular population or category of crime victims that has not been addressed by VOCA funds and are in need of services. Supporting documentation must be included.)

General Assistance

In addition to the categories required by VOCA, Oregon sets aside an additional ten percent (10%) of funds to subaward for a General Assistance category. The General Assistance category is designated for organizations that provide services to victims of all crimes such as the government-based Victim Assistance Programs.

II. SUBAWARD APPLICATION TYPES

DOJ CVSSD generally administers two types of VOCA subawards; **non-competitive** subawards and **competitive** subawards. Both types of subawards are described further below.

A. Non-Competitive Subawards

DOJ CVSSD determines the victim service programs eligible for the Non-Competitive subawards. Non-Competitive subawards are intended to support and fund core victim services and are usually funded for the same services year after year. The two applications for non-competitive funding are:

1. **Joint DV/SA Request for Application (RFA):** This application process is for non-profit agencies/programs that specifically offer options for safety through a continuum of intervention and support services for victims of domestic violence, sexual assault, dating violence, and stalking. The agencies/programs are currently receiving subawards directly from DOJ CVSSD or Department of Human Services (DHS). The following funding sources are part of this consolidated application process:
 - **Oregon Domestic and Sexual Violence Services Fund (ODSVS)** through DOJ CVSSD;
 - **Victims of Crime Act (VOCA)** Non-Competitive subaward funds for Domestic Violence and Sexual Assault services through DOJ CVSSD;
 - **STOP Violence Against Women Act (VAWA) Formula Subaward Program** victim services funding through DOJ CVSSD;
 - **DHS Domestic Violence Fund** including the state surcharge on marriage licenses (MLT fund), the Criminal Fines Account (CFA/DV) and the Federal Family Violence Prevention and Services Act (FVPSA) funding through DHS; and
 - **DHS Sexual Assault Victims Fund** using Criminal Fines Account (CFA/SA) funding through DHS.

Sub-recipients receiving funds through the Joint Application process submit applications through the DOJ CVSSD E-Grants system for each biennial subaward cycle. DOJ CVSSD notifies sub-recipients when the updated application is released. DOJ CVSSD also announces the release of the application on their website at: <https://www.doj.state.or.us/crime-victims/grant-funds-programs/oregon-domestic-and-sexual-violence-services-odsvs-fund/>.

2. **Prosecutor-Based Victim Assistance Programs; Child Abuse Intervention Centers; and Special Population Victim Service Programs Non Competitive RFA:** This application process is for government-based, child abuse and general victim service agencies/programs providing intervention and support services to all victims of crime. Sub-recipients receiving funds through this VOCA Non-Competitive process submit applications through the DOJ CVSSD E-Grants system every two years based on a federal fiscal year subaward cycle. DOJ CVSSD notifies sub-recipients when the updated application is released. DOJ CVSSD also announces the release of the application on their website at: <https://www.doj.state.or.us/crime-victims/grant-funds-programs/victims-of-crime-act-voca-assistance-fund/>.

B. Competitive Subawards

The VOCA Competitive Subaward request for application is open to all agencies who meet the VOCA eligibility criteria. The Competitive process is subject to availability of funding. Historically, DOJ CVSSD has released VOCA competitive subawards every two (2) years. The DOJ CVSSD Advisory Committee often makes recommendations for project focus areas for the competitive application process.

Agencies applying under this subaward opportunity submit their request for application through the online DOJ CVSSD E-Grants system. DOJ CVSSD announces the release of the application

on their website at: <https://www.doj.state.or.us/crime-victims/grant-funds-programs/victims-of-crime-act-voca-assistance-fund/>.

III. SUBAWARD AGREEMENTS

DOJ CVSSD will issue a subaward agreement upon making award decisions. The subaward agreement details all requirements of the funding and expectations of the sub-recipient agency. Every agency receiving an award should read the language of the subaward agreement carefully. By signing the subaward agreement, the sub-recipient is agreeing to comply with the subaward laws, rules, and terms of agreement for the funds for which they applied.

DOJ CVSSD reserves the right to modify the award amount and/or request a modification of the entire proposal, specifically the programmatic goals and budget items, with the selected applicant(s) prior to entering into a subaward agreement.

SECTION 3

SUB-RECIPIENT ELIGIBILITY REQUIREMENTS

All agencies awarded a VOCA Non-Competitive and/or Competitive Subaward must meet all of the following requirements:

I. RECORD OF EFFECTIVE SERVICES

Agencies must demonstrate a record of providing effective services to crime victims. This includes:

- having the support and approval of the community for its services,
- demonstrating a history of providing direct services in a cost-effective manner,
- having financial support from other sources, and
- meeting the eligibility requirements provided in this Section.

Agencies that do not meet the standards described in this section, must demonstrate that at least 25% of their financial support comes from non-VOCA sources to be eligible for VOCA funding.

II. MATCH REQUIREMENTS

VOCA requires matching contributions of 25% (cash or in-kind) of the total Federal VOCA funds (VOCA subaward) for *each* VOCA funded subaward. The match requirement allows programs to leverage federal funding and increase the amount of resources available to the projects supported with VOCA funds. It also encourages local investment and engagement with the VOCA-funded project. The term “VOCA proposal” or “subaward” refers to **both** federal VOCA funds and the associated non-federal match required in the approved VOCA budget.

The match must be derived from non-federal sources. *All funds designated as match are restricted to the same uses as the VOCA subaward funds* and must be expended within the subaward period. **Please note** that *each* subaward funded through DOJ CVSSD must have a match and that match must be specific to, and solely reported for, only one subaward.

Calculating the Match

The match requirement is 25% of the federal VOCA funds requested. One way to double check the required match is to multiply the total VOCA project (federal funds and match) funds requested by 20%. The resulting figures are the required match amount.



Examples - Two Approaches:

TOTAL PROJECT COST	\$50,000
Match: 20% of Total Project Cost (\$50,000)	- <u>\$10,000</u>
Federal funds needed	\$40,000

Federal funds you want to receive from VOCA	\$40,000
Match: 25% of VOCA request (\$40,000)	+ <u>\$10,000</u>
TOTAL SUBAWARD PROJECT COST	= \$50,000

Cash match may include, but is not limited to:

- County or state funds
 - could include: Criminal Fines Account (CFA), ODSVS, DHS Fund (MLT and CFA funds only);
- United Way funds;
- Private donations; or
- Any other non-federal money (VAWA or FVPSA funds **cannot** be used as match).

In-kind match may include, but is not limited to:

- Donations of equipment, office supplies – the value placed on loaned or donated equipment may not exceed its fair market value;
- Work space (pro-rated) – the value of donated space may not exceed the fair rental value of comparable space and facilities in a privately owned building in the same locality;
- Non-VOCA funded victim assistance activities – the monetary value of these services must reflect the rate of compensation for those employees performing the services and may include the costs of benefits. Services may include performing direct services, coordinating, or supervising those services, training victim assistance providers, or advocating for victims; and
- Volunteers –CFR §200.306(e) provides the following guidance for determining the value of volunteer hours used as match:
 - In order to count volunteer hours as match, the services provided by a volunteer must be an integral part of the approved subaward program.
 - If the volunteer provides a service similar to that provided by a paid employee, the volunteer’s time must be “valued” at the same rate as the employee’s time.
 - To determine the value of volunteer match for on-call response, sub-recipients must be careful to apply the same level of compensation paid to employees performing the same responsibilities.
 - If a sub-recipient does not compensate paid staff for time spent carrying a pager or phone, then no value can be attached to a volunteer’s time carrying a pager or phone.
 - If a sub-recipient compensates paid staff for time spent on an actual call-out, then a volunteer’s time would only be valued under the same conditions and at the same rate.
 - If a sub-recipient does compensate paid staff for carrying a pager or phone, then the volunteer hours must be valued at the same rate as the paid staff’s compensation.
 - If the volunteer is providing a service that cannot be found within the sub-recipient’s organization, the volunteer’s time should be valued at a rate consistent with what the sub-recipient would pay for work by a third party.
 - Paid fringe benefits (i.e., medical/dental insurance, worker’s compensation, commuter benefits...) that are reasonable, necessary and allowable may be included in the valuations of the volunteer’s time.
 - The value of a donated service must not exceed the rate a sub-recipient would pay an employee to provide the same services.

Volunteer hours used as match must be VOCA-allowable. For example, a VOCA volunteer may not facilitate prevention training such as Darkness to Light, because prevention is not an allowed activity for VOCA funding.

DOJ CVSSD does not require a certain hourly value for VOCA match, but leaves this determination to each sub-recipient.

Record keeping for match requirements (must be verifiable from the agency's records):

- Match contributions must qualify as VOCA allowable services or activities and conform to other provisions of the VOCA Program Guidelines from the Office for Victims of Crime. Match is subject to the same restricted uses as are the federal VOCA funds;
- VOCA sub-recipients must maintain records that clearly show the source, the amount and the period during which the match was expended. These records will be reviewed by a fund coordinator at the time of an in-person site visit;
- The basis for determining the value of personal services, materials, equipment, and space must be documented;
- Volunteer services used as match must be documented and, to the extent feasible, supported by the same methods used by the sub-recipient for its own paid employees. Suggestions for documenting volunteer time include calendars and volunteer timesheets;
- Matching funds may be used for any line item within the total budget (whether or not VOCA funds are within that line item) and *are not limited to an item-by-item match*. They may be credited to the subaward by the quarter as they are accumulated or be reported as contributed; and
- Sub-recipients are encouraged NOT to match in excess of the amount required, so as not to unnecessarily restrict resources that could be used for other purposes. The E-Grants system does not allow budgeting of match greater than 25%.

Exceptions to the 25% match requirement:

- Sub-recipients may request a full or partial waiver of the match requirement.
 - Per OVC process, waiver requests are made to DOJ CVSSD at the time of application. CVSSD will then seek approval from OVC.
 - OVC typically considers the following factors:
 - Local resources
 - Annual budget changes
 - Past ability to provide match
 - Whether the funding is for new or additional activities requiring additional match versus continuing activities where match is already provided.
 - See the [Match Waiver Request Guidance](#) document on the DOJ CVSSD website.
- **There is no match requirement for VOCA sub-recipients that are:**
 - Federally-recognized American Indian or Alaska Native Tribes or
 - Projects that operate on tribal lands.



Key Points to remember about match:

- 1. Match must be provided for each subaward and solely reported on one subaward;*
- 2. Match must come from non federal funds;*
- 3. Match is restricted to the same uses as VOCA subaward funds; and*
- 4. Match must be 25% of the VOCA funds.*

III. VOLUNTEERS

All sub-recipients must use volunteers to provide or support direct victim services unless compelling reasons exist to waive this requirement. A “compelling” reason may include a statutory or contractual provision that bars the use of volunteers for certain positions or the inability to recruit and maintain volunteers after a sustained and determined effort. This is a program-wide requirement. Programs are not required to tie the use of volunteers to every VOCA subaward unless volunteer hours are used as match on that subaward. Volunteers may include student interns. Please refer to Section 4: pages 25-36 for additional information.



All agencies receiving VOCA funds are required to use volunteers.

Reach out to your community – it is a great way to enhance your program and spread the word about victim services!

IV. PROMOTION OF COMMUNITY EFFORTS TO AID CRIME VICTIMS

Agencies must promote coordinated public and private efforts to help crime victims in order to ensure continuity of support for victims and to avoid duplication of effort. Coordination may include, but is not limited to, serving on federal, state, local, or Native American task forces, commissions and/or working groups or developing written agreements that contribute to better and more comprehensive services.

V. CRIME VICTIMS’ COMPENSATION PROGRAM ASSISTANCE

The Crime Victims’ Compensation Program (CVCP) is operated by the Crime Victim and Survivor Services Division of the Oregon Department of Justice. CVCP works to ease the financial burden many crime victims experience as a result of their victimization. They cover expenses such as counseling, medical expenses, rehabilitation expenses, funeral costs, and/or lost wages. VOCA sub-recipients are required to ensure that all agency service staff are familiar with

CVCP. VOCA sub-recipients must establish agency policies and procedures to identify clients who may be eligible for benefits and must assist clients in completing applications, along with gathering necessary information and documentation. Agencies are required to maintain a supply of CVCP brochures and applications. Information and materials can be obtained by calling the CVSSD office at (503) 378-5348 or by visiting the CVSSD website at: www.doj.state.or.us/crime-victims/victims-resources/victims-services/compensation-for-victims-of-crime/. CVCP provides quarterly training on CVCP guidelines and procedures at CVSSD. A schedule can be found at: <https://www.doj.state.or.us/crime-victims/training-opportunities/cvssd-trainings/> (general training link).

VI. NO CHARGE TO VICTIMS

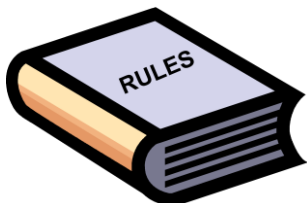
Programs are required to provide services to crime victims through the VOCA subaward at no charge to the victim. Any deviation from this provision requires prior approval from DOJ CVSSD.

VII. VICTIMS OF FEDERAL CRIMES

Agencies must offer services to victims of federal crimes on the same basis as victims of crime under state or local law. A victim of a federal crime is defined as a victim of an offense that violates a federal criminal statute or regulation. Federal crimes also include crimes that occur in an area where the federal government has jurisdiction, such as some Native American reservations, national parks, some federal buildings and military installations. Examples of other federal crimes are terrorism, bank robbery, some drug-related crimes, interstate or international kidnapping, mail or wire fraud, violation of a qualifying protection order under federal law and human trafficking.

VIII. CONFIDENTIALITY OF PERSONAL INFORMATION

In order to ensure the safety of adult, youth, and child victims of crime, a sub-recipient shall protect the confidentiality and privacy of people they serve. A sub-recipient shall not disclose any personally identifying information or individual information collected in connection with services requested, utilized, or denied through sub-recipient's programs.



THE BASIC RULE

Sub-recipients shall not disclose, reveal, or release individual client information **without the informed, written, reasonably time-limited consent** of the person about whom information is sought.

Consent for release may not be given by the abuser of a minor or incapacitated person, or the abuser of the parent of the minor.

In the case of an unemancipated minor, the minor and the parent or guardian may sign the release. In the case of a **person with disabilities** who has a guardian, the guardian may sign the release. If a minor or a person with a legally appointed guardian is permitted by law to receive

services without a parent’s (or guardian’s) consent, the minor or person with a guardian may consent to release of information without additional consent from the parent or guardian.

The term “**personally identifying information,**” “**individual information,**” or “**personal information**” means individually identifying information for or about an individual victim, 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.



If release of information described in the previous paragraph is compelled by statutory or court mandate, sub-recipients shall:

- **make reasonable attempts to provide notice to victims** affected by the disclosure of information; and
- **take reasonable steps necessary to protect the privacy and safety of the persons** affected by the release of the information.

Sub-recipients may share (1) non-personally identifying data in the aggregate regarding services to their clients and non-personally identifying demographic 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.

For more information about developing confidentiality policies, please see the [Guidelines for Confidentiality Policies](#) document on the DOJ CVSSD website.

IX. BREACH OF PERSONALLY IDENTIFIABLE INFORMATION

All sub-recipients must have written procedures in place to respond in the event of an actual or imminent breach of personally identifiable information (PII) if the sub-recipient creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of personally identifiable information within the scope of the subaward activities.

The breach procedures must include a requirement to ***report actual or imminent breach of PII to the sub-recipient’s fund coordinator no later than 24 hours after an occurrence*** of an actual breach, or the detection of an imminent breach.

For purposes of this requirement
PII means information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

Breach¹ means: The loss of control, compromise, unauthorized disclosure, unauthorized acquisition, or any similar occurrence where (1) a person other than an authorized user accesses or potentially accesses personally identifiable information or (2) an authorized user accesses or potentially accesses personally identifiable information for an other-than-authorized purpose.

- A breach is not limited to an occurrence where a person other than an authorized user potentially accesses PII by means of a network intrusion, a targeted attack that exploits website vulnerabilities, or an attack executed through an email message or attachment.
- A breach may also include the loss or theft of physical documents that include PII and portable electronic storage media that store PII, the inadvertent disclosure of PII on a public website, or an oral disclosure of PII to a person who is not authorized to receive the information.
- It may also include an authorized user accessing PII for an other-than-authorized purpose.



In developing procedures, sub-recipients may want to consider:

- Why is PII collected and maintained?
 - What purpose does it serve?
 - Does program keep or collect information not needed?
- Where is PII maintained?
 - computers
 - files
- How is PII protected in and out of the office?
- Do people take information out of the protected office space?
 - Could it be lost or stolen?
- What is the process for notifying people whose information has been breached?
 - What resources are offered?
 - Does program comply with ORS 646A.604?

X. COMPLIANCE WITH THE FEDERAL FUNDING ACCOUNTABILITY AND TRANSPARENCY ACT (FFATA) OF 2006

All recipients of Federal VOCA funds, and their sub-contractors, must comply with the Federal Funding Accountability and Transparency Act (FFATA) of 2006. The FFATA requires a single searchable website for each federal award of \$25,000 or more over the life of any sub-award (i.e., VOCA subaward period) that must be accessible by the public without cost. **In order to satisfy this requirement, sub-recipients are required to have a Data Universal Numbering System (DUNS) number and to maintain a current registration in the System for Award Management (SAM).**

¹ OMB Memorandum M-17-12, *Preparing for and Responding to a Breach of Personally Identifiable Information* (January 3, 2017), available at https://obamawhitehouse.archives.gov/sites/default/files/omb/memoranda/2017/m-17-12_0.pdf.

All programs are required to demonstrate they meet these criteria by providing proof of a DUNS number and current registration in SAM to DOJ CVSSD **prior to a subaward agreement being issued for VOCA funds.**



1. First Steps:

Your agency should verify whether or not it has a DUNS number and a current registration in SAM. **PLEASE NOTE:** If your agency does not have a DUNS number, and/or is not currently registered in SAM, it is imperative for you to begin these processes now due to the time required to complete these tasks. As of now, without a DUNS number and a current registration in SAM, DOJ CVSSD is not able to make an award of federal funds to an entity.

2. Requesting a DUNS Number:

To obtain a DUNS number, go to the DUNS registration website at: <http://fedgov.dnb.com/webform/> or call the special Dun & Bradstreet hotline at 1 (866) 705-5711. You will receive a DUNS number at the conclusion of your phone call. There is no cost associated with obtaining a DUNS number. Your DUNS number is required as part of registration with SAM.

3. Registering with System for Award Management (SAM):

Before registering with SAM, it is suggested that you review the [SAM User Guides](#) and the “[Frequently Asked Questions](#),” which are available on the SAM website at <https://www.sam.gov/SAM/pages/public/help/samQUserGuides.jsf>.



Suggestion: Pull together all the information you will need before beginning the registration process. For a list of information you need to get started, please visit www.sam.gov. Once you are ready to begin the online registration, allow 30-60 minutes to complete.

To register with SAM, go to <https://www.sam.gov/SAM/>. Click on “Create A User Account”. Follow the online instructions to complete your registration. If your questions/concerns are still unanswered, please contact the Federal Service Desk at fsd.gov.



Initial SAM registration requires a notarized letter verifying the administrator on the account. This notarized letter must be received within 30 days of registration activation or the account will be deactivated. Visit fsd.gov for a notarized letter template.

XI. CERTIFIED ASSURANCES & OTHER CERTIFICATIONS

VOCA subaward recipients must assure and certify that they comply with all applicable provisions of the Victims of Crime Act of 1984, as amended, and all other applicable federal rules regulating subawards. This includes VOCA, the Office for Victims of Crime Program Guidelines, and the Office for Justice Programs Financial Guide. When a sub-recipient signs a subaward agreement, they are agreeing to comply with the subaward contract terms for the funds for which they applied. *Please read the Certification language carefully in the subaward agreement.*



A. Non-supplantation

Federal funds must be used to **supplement** existing funds for program activities **and must not replace** funds that have been appropriated for the same purpose. Supplanting will be the subject of application review, as well as pre-award review, post-award monitoring, and audit. If there is an appearance of supplanting, the applicant or sub-recipient will be required to supply documentation demonstrating that the reduction in non-Federal resources occurred for reasons other than the receipt/expected receipt of Federal funds. The Federal Administrator of VOCA Funds or DOJ CVSSD may request a written certification stating that Federal funds will not be used to supplant State or local funds.

Nonprofit agencies are not bound by non-supplantation rules.

B. Whistleblower Protection

Sub-recipients must comply with federal whistleblower protections (41 U.S.C. 4712). This includes provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to:

- gross mismanagement of a federal grant,
- a gross waste of federal funds,
- an abuse of authority relating to a federal grant,
- a substantial and specific danger to public health or safety, or
- a violation of law, rule, or regulation related to a federal grant.

Sub-recipients must inform their employees, *in writing* (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712.

Potential fraud, waste, abuse, or misconduct involving or relating to funds under the subaward should be reported to the Office of the Inspector General by:

- (1) mail directed to: Office of the Inspector General, U.S. Department of Justice, Investigations Division, 950 Pennsylvania Avenue, N.W. Room 4706, Washington, DC 20530;
- (2) e-mail to: oig.hotline@usdoj.gov; and/or
- (3) the DOJ OIG hotline: (contact information in English and Spanish) at (800) 869-4499 (phone) or (202) 616-9881 (fax).

Sub-recipients must certify that they are in compliance with federal whistleblower protection requirements (41 U.S.C. 4712). This specifically includes informing employees of their rights and remedies when situations arise. In order to comply with this requirement, sub-recipients are now required to complete, and upload into E-Grants, the Whistleblower Certification form at least once every two years. This certification is found at: https://justice.oregon.gov/crime-victims/pdf/whistle_blower_certification.pdf.

Additional information is available from the DOJ OIG website at <https://oig.justice.gov/hotline/whistleblower-protection.htm> and in the DOJ Whistleblower Information document found at <https://oig.justice.gov/hotline/docs/NDAA-brochure.pdf>.

C. Civil Rights Compliance

Upon award, each sub-recipient is required to review and sign a “Certification of Compliance with Regulations” federal form from the Office for Civil Rights, Office of Justice Programs and comply with any of the applicable certification requirements. *Each sub-recipient is required to maintain statutorily required civil rights statistics on victims’ services by race, national origin, sex, age, and disability.* Sub-recipients must also permit access to documents and records to determine whether the sub-recipient is complying with applicable civil rights laws. This requirement is waived when the sub-recipient is providing a service such as telephone counseling where soliciting the information may be inappropriate or offensive to the crime victim. Civil rights statistics must be kept on file with other VOCA subaward documentation and must correspond with each subaward period. The information will be reviewed during onsite visits or at the request of the Federal Administrator of VOCA Funds of the Office for Victims of Crime.

Civil Rights Non-Discrimination Requirements

All VOCA sub-recipients must assure and certify that they comply with all applicable civil rights non-discrimination 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, 34 U.S.C. § 10228(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).

Title VI of the Civil Rights Act of 1964, prohibits recipients from discriminating on the basis of national origin in the delivery of services or benefits. Compliance requires taking reasonable steps to ensure that persons with limited English proficiency (LEP) have meaningful access to funded programs or activities. A person with limited English proficiency is one whose first language is not English and who has a limited ability to read, write, speak, or understand English. To assist sub-recipients in meeting their obligation to serve people with limited English proficiency, the Department of Justice (DOJ) has published a guidance document, which is available on the [LEP.gov web site](http://LEP.gov). CVSSD encourages applicants and recipients to include the costs for providing interpretation and translation services to eligible LEP service populations within their program budgets.

VOCA requires that no person shall be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in connection with any program or activity receiving funds under VOCA on the basis of race, color, religion, national origin, sex, age, or disability. **If, after a due process hearing**, a federal or state court or federal or state administrative agency makes a **finding of discrimination** against a sub-recipient on the grounds of race, color, national origin, sex, or disability, a **copy of such findings must be forwarded to DOJ CVSSD and to the Office for Civil Rights (OCR) for the Office of Justice Programs**.

The CVSSD webpage, <https://www.doj.state.or.us/crime-victims/for-grantees/civil-rights-requirements/>, provides information and links that will assist sub-recipients in complying with three mandatory federal processes. These include:

- Civil rights laws and regulations prohibiting discrimination in federally assisted programs or activities;
- Limited English Proficiency (LEP) guidelines; and
- Equal Employment Opportunity Plans (EEOP). *Non-profit organizations and Tribal Nations are exempt from the EEOP requirements, but must complete the EEOP form included as a Subaward Agreement Exhibit.*

These processes are required and include notification of nondiscrimination policy, responding to discrimination complaints, and civil rights **training**.



Sub-recipients are required to update the Civil Rights Training Certification every two years and upload it in E-Grants before the subaward agreement is signed.

For more information about civil rights training visit the CVSSD webpage: <https://www.doj.state.or.us/crime-victims/for-grantees/civil-rights-requirements/>.

D. Comply with Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; and Drug-Free Workplace Requirements

Each sub-recipient is required to review and sign the following federal forms from the Office of Justice Programs and comply with any of the applicable certification requirements:

1. Lobbying Certification

This certification must be completed at the time of accepting a subaward from DOJ CVSSD. This rule provides guidance on requirements that subaward recipients shall meet in order to receive Federal funds. According to federal guidelines, a sub-recipient entering into a **subaward agreement of \$100,000** or more must certify that:

- No federally-appropriated funds will be expended by sub-recipients of a Federal award, cooperative agreement or subaward to pay a person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with any of the following covered Federal actions:
 - the awarding of any Federal subaward,
 - the making of any Federal subaward,
 - the entering into of any cooperative agreement, and
 - the extension, continuation, renewal, amendment, or modification of any Federal subaward or cooperative agreement; and
- If any funds other than federal appropriated funds have been paid or will be paid to any person for influence of an officer or employee or any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this federal subaward or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

2. Debarment and Suspension Certification

This certification must be completed at the time of accepting a subaward award from DOJ CVSSD. The government-wide rule for debarment and suspension provides guidance on requirements that sub-recipients shall meet in order to receive federal funds. This rule protects the federal government from fraud, waste and abuse by avoiding doing business with entities who have been involved in wrongdoing.

3. Drug-Free Workplace Certification

This certification must be completed at the time of accepting a subaward from the DOJ CVSSD. The government-wide rule for a drug-free workplace provides guidance on requirements that subaward recipients shall meet in order to receive federal funds. In the case of a sub-recipient who is an individual, that individual must certify to the agency that his or her conduct of award activity will be drug-free. If a sub-recipient makes a false certification, the sub-recipient is subject to suspension, termination and debarment.

E. Partnerships with Faith-Based and Other Neighborhood Organizations

Executive Orders 13279 and 13559 and the Partnerships with Faith-Based and Other Neighborhood Organizations regulation, codified at 28 C.F.R. Part 38, require funding organizations to treat faith-based organizations (FBOs) the same as any other applicant or recipient of federal funding. They may neither favor nor discriminate against FBOs in making and administering subawards. FBOs must be allowed to retain their independence, autonomy, expression, and religious character when competing for federal funding.

The Executive Orders and regulation also prohibit recipient FBOs from using federal funding to engage in explicitly religious activities, such as proselytizing, scripture study, or worship. Funded FBOs may engage in explicitly religious activities; however, these activities must be separate in time or location from the federally assisted program. Additionally, funded FBOs must not compel program beneficiaries to participate in explicitly religious activities. Funded faith-based organizations must also not discriminate on the basis of religion in the delivery of services or benefits.

VOCA contains express nondiscrimination provisions that prohibit all sub-recipients from discriminating on the basis of religion in employment. Despite these nondiscrimination provisions, the Justice Department has concluded that, on a case-by-case basis, FBOs may continue considering religion when hiring staff, if it meets the following criteria:

1. The FBO demonstrates that its program for which it seeks federal funding is an exercise of religion;
2. The FBO demonstrates that requiring it to either forgo its religious preference in hiring or forgo the federal funding would substantially burden its exercise of religion; and
3. The funding entity is unable to demonstrate that applying the nondiscrimination provision to this FBO would both further a compelling government interest and be the least restrictive means of furthering this interest.

The Justice Department may grant exemptions to the prohibition against hiring discrimination on the basis of religion on a case-by-case basis, unless there is good reason to question the truthfulness of the FBO. FBOs seeking an exemption to their

prohibition against religious discrimination in hiring must complete, submit, and retain an original signed Certificate of Exemption for Hiring Practices on the Basis of Religion certifying to the following three provisions:

1. The FBO will offer all federally-funded services to all qualified beneficiaries without regard for the religious or non-religious beliefs of those individuals; and
2. Any activities of the FBO that contain explicitly religious content will be kept separate in time or location from any services supported by direct federal funding, and if provided under such conditions, will be offered only on a voluntary basis; and
3. The FBO is a religious organization that sincerely believes that providing the services in question is an expression of its religious beliefs; that employing individuals of particular religious belief is important to its religious exercise; and that having to abandon its religious hiring practice to receive federal funding would substantially burden its religious exercise.

FBOs seeking such an exemption should submit the original signed Certificate of Exemption to **DOJ CVSSD after receipt of an award**. DOJ CVSSD will forward the Certificate of Exemption to the Office for Civil Rights for consideration.

For more information on the regulation, please see OCR's website at:
<https://ojp.gov/fbnp/index.htm>

F. Compliance with State Criteria and Victims' Rights

Sub-recipients must abide by any additional eligibility or service criteria established by DOJ CVSSD, including submitting financial, statistical, and programmatic information on the use and benefits of VOCA funds. Every agency that receives VOCA funds is expected to make a reasonable effort to ensure that crime victims in Oregon are treated with dignity, fairness and respect in accordance with U.S. and Oregon constitutional and statutory laws, including victims' rights. Sub-recipients shall take appropriate action to inform crime victims of their rights and to assist victims in exercising those rights.

XII. DEMONSTRATES ACCESS TO EFFECTIVE SERVICES

To ensure meaningful access to services for all victims of crime across the State, programs must be able to appropriately respond to requests for assistance (e.g. completion of compensation claims, emergency housing, child abuse medical assessments, etc.). In addition, those agencies whose primary services are focused on a specific area of victim assistance must be able to directly link victims whose needs may be beyond their expertise to the appropriate community partner agency.

XIII. MAINTAINS GOOD FISCAL MANAGEMENT

Agencies must be able to maintain adequate funding, expend funds according to submitted budgets, keep financial records, and comply with subaward reporting requirements. Agencies with deficiencies in any of these good fiscal practices may receive conditional subawards. Agencies may also be required to submit additional information addressing those deficiencies before a subaward is awarded. See Section 6: pages 46-51 for complete financial requirements.

XIV. COMPLIES WITH FINANCIAL, DATA AND OUTCOME REPORTING

All agencies must comply with the Federal and DOJ CVSSD reporting requirements including the timely submission of quarterly statistical, financial, common outcome measures and semi-annual narrative and statistical reports. See Section 5: pages 37-45 for a complete description of reporting requirements.

XV. PROVIDES CULTURALLY RESPONSIVE AND ACCESSIBLE SERVICES

Applicants will provide services that are culturally responsive 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.

XVI. COMPLIES WITH TRAINING REQUIREMENTS

All sub-recipients must ensure staff and volunteers receive appropriate foundational training to support them in providing competent direct services. Sub-recipients must assess staff and volunteers for readiness to provide direct services and must document completion of training requirements within the CVSSD E-Grants system. Training requirements apply to staff, volunteers, and board members as described below.

A. Staff

All sub-recipients must ensure that staff providing direct services in City and County Government-based agencies, Child Abuse Intervention Centers, and Special Population organizations will successfully complete the Oregon Basic State Victim Assistance Academy (SVAA) training during the first year of the funding cycle. Any staff who had previously attended SVAA has met the requirement. Information for the SVAA training is available at the NCVLI website at:

https://law.lclark.edu/centers/national_crime_victim_law_institute/projects/OR_SVAA/.

VOCA funded staff with direct responsibility for domestic violence and sexual assault programs will successfully complete training that meets the requirements adopted by the Department of Human Services (“DHS) Advisory Committee which can be found [here](#) on CVSSD’s website. The training requirement can be met by completing the online Core Advocate Training developed by the Oregon Coalition Against Domestic and Sexual Violence available at: <https://www.ocadsv.org/resources/online-core-advocacy-training>.

VOCA funded campus-based staff providing direct services to survivors of gender based violence will successfully complete the 40-hour Campus Advocacy Training provided by the Oregon Attorney General’s Sexual Assault Task Force. The Campus Advocate Training is also available online at: <http://oregonsatf.org/training/40-hour-campus-advocate-training-online/>.

VOCA funded staff may alternatively submit a 40-hour training plan for CVSSD approval that covers topics relevant to the funded staff position(s). The 40-hour training plan may include relevant topics from the:

1. Oregon Basic State Victim Assistance Academy described above;
2. DHS Advisory Committee adopted DV/SA training requirements. Click [here](#) to see the document on the CVSSD webpage;
3. Core Advocate Training developed by the Oregon Coalition Against Domestic and Sexual Violence available at: <https://www.ocadsv.org/resources/online-core-advocacy-training>;
4. Office for Victims of Crime (OVC) Victims Assistance Training [VAT Online](#) can be found under the Course Descriptions tab; and
5. Additional population-specific topics.

At least one VOCA funded staff in an agency is required to attend Crime Victims' Compensation Program (CVCP) training at least once every four years. This trained staff person is responsible for ensuring all agency staff providing direct services understand the requirements and benefits of CVCP, as well as how to apply. All VOCA funded staff providing direct services are strongly encouraged to attend CVCP training. VOCA funded staff providing direct services are also encouraged to attend an Address Confidentiality Program (ACP) training. CVCP and ACP training is held quarterly in Salem at the CVSSD office. The agenda and training schedules are available on the [CVSSD Training Calendar](#) .

All staff not providing direct service should minimally be informed on the basics of providing services to victims of crime.

B. Volunteers & Interns

Volunteers and interns providing VOCA-funded direct services in domestic violence and sexual assault programs must complete training that meets the requirements adopted by the Department of Human Services ("DHS) Advisory Committee which can be found [here](#) on CVSSD's website. The training requirement can be met by completing the online Core Advocate Training developed by the Oregon Coalition Against Domestic and Sexual Violence available at: <https://www.ocadsv.org/resources/online-core-advocacy-training>

Volunteers and interns providing VOCA funded campus-based direct services to survivors of gender based violence will successfully complete the 40-hour Campus Advocacy Training provided by the Oregon Attorney General's Sexual Assault Task Force. The Campus Advocate Training is also available online at: <http://oregonsatf.org/training/40-hour-campus-advocate-training-online/>.

Volunteers and interns providing VOCA-funded direct services in City and County Government-based agencies, Child Abuse Intervention Centers, and Special Population organizations are required to successfully complete the OVC VAT *Online* training or a training program that minimally covers the topics included in VAT *Online* during the first year of the grant cycle. Registration information for the VAT *Online* training can be accessed at: <https://www.ovcttac.gov/vatonline>.

Alternatively, organizations may submit a training plan for CVSSD approval that covers topics relevant to volunteer position(s), which may be from VAT *Online*, DHS Advisory Committee adopted training requirements, SVAA, all described above, and additional population-specific topics.

The volunteer/intern supervisor will develop a training plan to consist of a minimum of 40-hours based upon the needs of the program and volunteers. It is the responsibility of the volunteer/intern supervisor to document the training completed. CVSSD fund coordinators will verify this information at the time of an in-person site visit. Volunteers and interns not providing direct service should minimally be informed on the basics of providing services to victims of crime.

C. Board of Directors

Each non-profit organization or Tribal Nation will identify the individual or group with direct responsibility for victim services programs.

The designated leader(s) *may* include members of the Board of Directors, Tribal leaders, the program supervisor, or a DV/SA Advisory Board/Committee and must have a minimum of 12 hours of training during their first year in this role. The training must cover domestic violence, sexual assault, dating violence, stalking, anti-racism and anti-oppression training, confidentiality and privilege (two hours), State and federal program requirements including but not limited to civil rights, program philosophy, and oversight responsibilities. On-going training is strongly encouraged. Training can be presented over several months, through annual meetings, self-study with debriefing, etc. Training must be documented. The designated leader(s) are encouraged to receive the same 40 hours of initial training required of the staff and volunteers, in addition to training specifically dealing with governance of the organization.

CVSSD fund coordinators will request to view the documentation of training at the time of their in-person visit to the program.

XVII. CONDITIONAL AWARDS

All subawards are made conditional upon the timely completion of subaward documents. Funds are not considered obligated and will not be transferred until all required subaward documents have been signed by an applicant and by the DOJ CVSSD designee. DOJ CVSSD has the authority to reallocate the funds awarded if an applicant does not complete subaward documents within three months of notice of the intended award.

An Award May Be Made Conditionally If:

- the sub-recipient is not current in reporting for any previous subaward;
- has fewer than two full years of operational history in providing services to victims of crime;
- 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

² Definition of Program Stability for DOJ CVSSD Sub-recipients

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

- a. An applicant's history of providing cost-effective direct services to victims.
- 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.

- 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, DOJ CVSSD will notify the applicant that a conditional award has been issued. The award will specify the conditions to be satisfied by the applicant and the date by which the conditions must be satisfied. Fund coordinators will contact applicants who do not satisfy conditions of funding by the date specified to discuss next steps. See Section 6: pages 46-51 of this Handbook for additional information on financial requirements.

SECTION 4

VOCA MANAGEMENT AND OPERATIONS GUIDELINES

I. INTRODUCTION

These guidelines have been established to provide clarification for VOCA sub-recipients, as well as to supplement information received from fund coordinators and other sources.

II. GUIDELINES FOR EMPLOYEE MANAGEMENT

General Staffing Matters

1. VOCA subawards may fund:

- staff providing direct services to crime victims;
- staff who recruit, train and supervise volunteers who are used as part of the program;
- other paid staff **ONLY IF** the sub-recipient can demonstrate they are essential to support the delivery of direct services.

2. Staffing Changes

Sub-recipients must report any change in personnel in a VOCA-funded position to DOJ CVSSD within 30 days of the departure of that staff person. This should be accomplished by updating the Staff Roster page for the sub-recipient organization within the E-Grants system.

- If a new person is hired to replace staff leaving, it is important to enter the new staff person as a new, independent entry indicating their start date and relevant information.
- The entry for the former staff person should be completed by entering the date that person vacated the position, effectively ending their access to E-Grants.

3. Leadership Changes

It is the responsibility of the District Attorney, or the Board of Directors, of a VOCA-funded agency, to notify DOJ CVSSD within thirty (30) days of any change in leadership within the program (i.e., Director). In addition, organizations must update the Staff Roster within the E-Grants system.

- If a new person is hired to replace the outgoing director, it is important to enter the newly-hired director as a new, independent entry indicating their start date and relevant information.
- The entry for the outgoing director should be completed by entering the date that person vacated the position, effectively ending their access to E-Grants.

4. Separation of Powers

The Executive Director of the sub-recipient agency may not serve as a member or Chair of the Board of Directors.

5. Fundraising and/or Lobbying Activities

Employees and volunteers are not allowed to coordinate, organize, or participate in fundraising activities or participate in lobbying activities on time budgeted to the VOCA subaward. This includes time paid with matching funds associated with the subaward, or time paid with program income earned from VOCA-funded activity.

A. Maintaining Records

Sub-recipients must maintain accurate **time/attendance records** for positions budgeted in subawards. Sub-recipients must also maintain written **personnel policies** and keep these policies updated. DOJ CVSSD recommends reviewing and updating personnel policies every two years in preparation for subaward application processes.

1. Accurate Time/Attendance Records

Accurate time/attendance records must be maintained for all positions budgeted under the subaward. Federal funding requires sub-recipients to engage in **direct timekeeping**. This includes salaried positions and any personnel (including volunteers) written into the budget attributed as federal funds or match. Adequate documentation and policies must be maintained within the VOCA file. Special care should be taken if a position is funded from more than one source. The Organization Details in the E-Grants system provides a framework for capturing this information and DOJ CVSSD urges sub-recipients to update this information as necessary. For more information on direct timekeeping, please see [CVSSD Guidance on Timekeeping](#) at the DOJ CVSSD website.



How Does Direct Timekeeping Work?

- Sub-recipients may not simply bill employee time according to their approved VOCA budget. That would be “budgeted time,” not direct timekeeping.
- Sub-recipients must correlate the hours worked with VOCA eligible services/activities.
- DOJ CVSSD recommends that VOCA funded positions note what services/activities (e.g., direct advocacy, safety planning, court accompaniment) they engage in on their time sheets when charging their work hours to VOCA.
 - In the alternative, staff could maintain separate, back up documentation showing their time and the associated services for that time.
- The time sheet must provide a breakdown of the total time for which the employee is compensated.
 - If a position is funded by multiple sources, the time sheet should have a separate breakdown for each program/funding source.
 - 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 this documentation can be met within the sub-recipient’s current management system, there is no need to establish a separate tracking system.
- ***Volunteer hours used for match must be tracked and approved in a similar manner.***

2. Personnel Policies and Procedures

Sub-recipients should maintain written personnel policies and procedures to include:

- | | |
|-----------------|----------------------|
| ▪ work hours | ▪ overtime pay |
| ▪ on-call hours | ▪ compensatory time |
| ▪ holidays | ▪ termination |
| ▪ vacation | ▪ job descriptions |
| ▪ sick leave | ▪ job qualifications |

These policies must be available at the agency for review by fund coordinator.



ON-CALL POLICY

The **Fair Labor Standards Act** determines whether or not an employee must be compensated for “on-call” time.

- Employees who are required to be on the premises of the agency while they wait to be called to duty must be compensated.
- Their time is subject to the laws and rules governing minimum wage and overtime.
- If an employee is required to carry a pager, work cell phone or leave a number when they can be reached during specific hours, **but otherwise is not restricted to a location**, then they typically do not need to be compensated for their time waiting.

Even if employees who carry pagers, etc. are not required to be compensated, there is nothing that prevents an agency from establishing a policy that compensates employees for that time.

- Contracts, such as collective bargaining agreements, may grant employees additional rights to compensation.
- For example, if a collective bargaining agreement applies, employees may be entitled to “call back pay” or to a monetary increase in hourly pay for hours when they are on-call, even if they are not on the premises.

An agency should have a policy regarding who works on-call shifts and the expectations of on-call shifts.

That policy should apply equally to employees and volunteers alike.

B. Volunteers

Volunteers are an essential part of any VOCA-funded program. Two key issues to keep in mind when designing a volunteer program and reporting volunteer time for subaward purposes are:

1. Employees as Volunteers

Paid agency employees may not perform their duties as volunteers. Unpaid overtime, on-call duties, or un-reimbursed staff expenses may not be considered “volunteer” time, especially if these duties are explicitly stated in the employee’s job description.

In order for an employee to qualify as a volunteer, the following four criteria must be met:

- The work must be at the employee’s initiative;
- The work must be outside normal or regular work hours;

- The employee must be performing a task for which they do not expect payment;
and
- The employee must be performing a task outside of their regular job functions.

2. Reporting Volunteer Hours as Match

Volunteer hours may be used as match for a VOCA-funded project. A sub-recipient should consider the following when deciding whether to use volunteer hours as match:

- Any volunteer activities counted toward match must be VOCA-allowable activities. Please review the [VOCA Allowable and Unallowable Costs and Services](#) document for more specific information about which activities are allowable.
- Volunteer time used as match must be tied to that specific VOCA-funded project.
- Sub-recipients must determine how to value volunteer hours. Please refer to Section 4, pages 28-29, of this document for detailed information about how to value volunteer match.
- If using volunteer hours for match, it is important for programs to have well-defined time-keeping practices to accurately document volunteer time. Please refer to subsection B of this section (page 26) for more information about recordkeeping and direct timekeeping.

D. Criminal History Verification (Background Checks)

A sub-recipient shall obtain a criminal history record check on any employee, potential employee or volunteer working with victims of crime or having access to individual client information. This could be accomplished in the following ways:

- a. Have the applicant, as a condition of employment or volunteer service, apply for and receive a criminal history check from a local Oregon State Police (OSP) Office and furnish a copy to the sub-recipient; or
- b. As the employer, contact a local OSP office for an “Oregon only” criminal history check on the application/employee/volunteer; or
- c. Use another method of criminal history verification that is at least as comprehensive as the OSP methods described in paragraphs a. and b. above.

A criminal record check will indicate arrests or convictions of child abuse, offenses against persons, sexual offenses, child neglect, or any other offense bearing a substantial relation to the qualifications, functions or duties of an employee or volunteer intended to work with victims of crime.

The sub-recipient shall develop a policy or procedure(s) to review criminal arrests or convictions of employees/potential employees/volunteers. The review should examine:

- The severity and nature of the crime;
- The number of criminal offenses;
- The time elapsed since commission of the crime;
- The circumstances surrounding the crime;

- The individual's participation in counseling, therapy, education or employment evidencing rehabilitation or a change in behavior; and
- A review of the police or arrest report confirming the individual's explanation of the crime.

After receiving the criminal history check, the sub-recipient shall determine whether the employee/potential employee/volunteer has been convicted of one of the crimes described in this section. If so, they must determine whether, based upon the conviction, the person poses a risk to working safely with victims of crime. If the sub-recipient intends to hire or retain the employee/potential employee/volunteer, the sub-recipient shall document in writing the reasons for hiring or retaining the individual. These reasons shall address how the applicant/employee/volunteer is presently suitable or able to work with victims of crime in a safe and trustworthy manner, based on the agency's policy. The sub-recipient will place this explanation, along with the applicant/employee/volunteer's criminal history check, in the employee/volunteer personnel file for permanent retention.

E. Other

State and federal VOCA Guidelines (rules, restrictions and reporting requirements) apply to paid and volunteer staff only to the extent such positions are included in the VOCA subaward budget, whether supported with federal VOCA or local match funds. The following are illustrations:

- The salary and benefits for a full-time legal advocate are fully funded with federal VOCA funds. The entire position is subject to all VOCA requirements.
- Half of the salary and benefits for a full-time legal advocate are paid with federal VOCA funds and half is included in the VOCA subaward as match (source of the match is United Way funds). The entire position is subject to all VOCA requirements.
- Half of the salary and benefits for a full-time legal advocate are paid with federal VOCA funds. The other half is not part of the VOCA subaward as match. Only the hours charged to the VOCA subaward are subject to VOCA requirements and only clients served and services provided for that portion may be included in VOCA subaward reports.
- Volunteers provide an agency with a total of 5,000 hours of services (valued at \$14 per hour) but only 1,000 hours of those volunteer hours are included as in-kind match. Only the 1,000 hours of volunteer time (\$14,000 as the match contribution) reported are subject to VOCA requirements.

III. GUIDELINES FOR CONTRACTS AND SUBAWARDS



Where the intent to award contracts or subawards is known and expressly stated as part of the application, the approval may be considered granted if these activities are funded as proposed.

Once an agency has been awarded a VOCA subaward, those VOCA funds cannot be further subawarded or contracted out to another organization for the completion of subaward activities if the intent to do so was not included in the application.

All formal non-financial and financial arrangements with other entities or individuals to collaborate, purchase goods or services, or accomplish a portion of a subaward-funded activity, **must be formalized in written and signed agreements between the parties involved.**

Financial arrangements are formalized using either a Subcontract or a Subaward depending on the type of purchase.

- A **procurement transaction (subcontract)** is needed when subaward funds will be used to obtain goods or services from an outside entity (contractor) for the applicant’s own use or for project participants at the direction of the applicant.
 - The contractor will not make participant eligibility determination and does not have the authority to make decisions regarding the delivery of services and the types of services provided.
- A **subaward** is needed when these subaward funds will be awarded to an outside entity (sub-recipient) to carry out one or more services of the subaward-funded project.
 - This second sub-recipient generally makes participant eligibility determination and has the authority to make decisions regarding the delivery of services and the types of services provided within the scope of the agreement.

The proper classification of a financial arrangement as a subaward or a procurement transaction (subcontract) at the time it is proposed is critical to ensure proper accounting for costs and compliance requirements. The following table provides some of the more important factors:

Subaward Factors	Procurement Factors
Distributes financial assistance in the form of money or services to eligible sub-recipients.	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.
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 sub-recipient.	Provides goods or services that are ancillary to the operation of the federal program.

A more detailed [Contractor and Sub-recipient Determination Checklist](#) is available to assist sub-recipients in making the correct selection in these financial arrangements.

Procurement Transaction (Subcontract). An Independent Contractor Agreement formalizes the financial arrangement between a Sub-recipient and a Contractor who has been selected through a competitive procurement process (unless a sole source arrangement has been justified) to provide goods or services for the Sub-recipient.

Please Note:

Compensation for consultant services should be reasonable and consistent with that paid for similar services in the marketplace. Compensation in excess of \$650 per 8 hour day, or \$81.25 per hour, requires prior approval from DOJ CVSSD.

An Independent Contractor Agreement must, at a minimum, include:

- Parties to the Agreement
- Term of the Agreement
- Scope of Work and Deliverables
- Contractor Compensation
- Independent Contractor Relationship
- Representations and Warranties
- Indemnification
- Confidentiality
- Insurance Requirements
- Amendments
- Signature of Authorized Representatives

A detailed description of each element is available at: https://justice.oregon.gov/crime-victims/pdf/cvsd_subcontract_elements.pdf.

The written agreement may not affect the sub-recipient's overall responsibility for the duration of the subaward and accountability to DOJ CVSSD. The sub-recipient is responsible for monitoring the subcontractor and determining that all fiscal and programmatic responsibilities are fulfilled.

Sub-recipients must submit all subcontractor contracts to DOJ CVSSD when finalized.

No subcontractor payments will be issued if a subcontractor agreement has not been received by DOJ CVSSD.

Subawards. A Subaward Agreement formalizes the financial arrangement between a primary sub-recipient and a secondary sub-recipient for the purpose of carrying out a part of the primary subaward activities. A sample of a VOCA subaward agreement is available at: https://justice.oregon.gov/crime-victims/pdf/cvsd_subaward_elements.pdf. All secondary sub-recipients must agree to abide by all primary subaward agreement requirements. The primary sub-recipient must, in essence, create their own subaward agreement for the secondary sub-

recipient. That agreement must contain all of the same requirements as the primary subaward agreement.



WHEN DO I NEED A CONTRACT?

A CONTRACT is required:

- ***when VOCA funds will be used by the sub-recipient to pay for professional services that are outside their agency.***
- ***anytime a financial transaction will occur between the agency and another entity or person.***

All services must be allowable under the VOCA guidelines.

Examples include: collaborative projects, support groups, therapy services and emergency legal services.

For more information about procurement, please see the [Guidance on Procurement Process](#) document at the DOJ CVSSD website.

IV. GUIDELINES FOR A MEMORANDUM OF UNDERSTANDING

Non-financial arrangements are formalized using 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). The MOU provides documentation that demonstrates the organizations have consulted and coordinated the responsibilities of their subaward activities. A template for an MOU can be found [here](#) on the DOJ CVSSD website.

The following elements should be included when composing an MOU:

- Description of each partner agency;
- Purpose of the MOU;
- Description of agreed upon roles and responsibilities each organization or agency will be providing to ensure project success. The roles and responsibilities should align with project goals, objectives and target outputs;
- Identification of staff responsible for completing the specific responsibilities, this should include meeting DOJ CVSSD reporting requirements;
- Description of how the collaboration/partnership benefits the project;
- Description of the resources each partner would contribute to the project. This can be a time commitment, in-kind contributions, or grant funds (e.g., office space, staff, training, etc.);
- A statement that the lead agency accepts full responsibility for the performance of the collaborative organizations/agencies; and
- Signatures by all partners. Signatories must be officially authorized to sign on behalf of the agency and include title and agency name.

V. GUIDELINES FOR TRAINING AND TRAVEL

A. Travel/Mileage for Direct Services

Travel costs for paid and volunteer staff must be for the purpose of providing or supporting direct services to victims. This may include reasonable costs for transporting victims in connection with the provision of direct services. The travel must take place within the subaward period (i.e., between the subaward's beginning and ending dates). All travel expenses must be documented and retained in the appropriate VOCA file.

B. Training

VOCA funds can support training costs for paid staff and volunteers when they attend training exclusively for developing the skills of direct service providers so they are better able to offer quality direct services. ***Sub-recipients may use VOCA funds to train prosecutors and law enforcement staff if the training is to develop their skills to deliver direct victim services*** and not for any aspect of investigation of a crime, prosecution of criminal activities, or crime prevention.



If an individual attends a training conference that has a mix of direct victim services training and training topics not allowed under VOCA, the cost of the training must be appropriately prorated between VOCA and other funding sources.

1. Training within Oregon:

Training within Oregon need not be approved in advance as long as training was approved in the subaward budget. It is the agency's responsibility to ensure that training costs comply with VOCA restrictions. Sub-recipients should not assume a specific training event identified in a budget proposal is necessarily appropriate for VOCA funding. *It is suggested that agencies confer with DOJ CVSSD regarding the appropriateness of specific training events to avoid having reimbursement for these costs rejected at a later date.*

2. Training Outside of Oregon

When needed training is not available within the sub-recipient's immediate geographical area, VOCA funds may support training outside of the geographical area. For example, sub-recipients may benefit by attending national conferences that offer skills-building training workshops for victim assistance providers. Because federal VOCA guidelines discourage the use of VOCA funds outside the sub-recipient's immediate geographic area, **training outside Oregon must be approved by DOJ CVSSD in advance**, unless a specific training is approved at the time of the subaward.

When requesting out of state training in advance, sub-recipients must provide the following:

- Agenda;
- Reason for attending;

- Description of topics sufficient to establish that training is for direct victim services skill development;
- Itemized costs; and
- Reasons why comparable training within the state is unavailable.

3. Unallowable Costs Related to Training

- Training that addresses any aspect of investigation of a crime, prosecution of criminal activities, or crime prevention.
- Training unrelated to direct victim services, such as grant writing, fundraising, lobbying or general administration/management;
- Training of persons who do not provide direct victim services, such as Executive Directors, administrative or clerical assistants and board members;
- Costs associated with a sub-recipient providing training to individuals from other organizations (staff from other organizations can be invited to attend training activities that are held for the sub-recipient's staff, if no additional costs will be incurred by the VOCA funded sub-recipient);
- Costs of sending individual crime victims to conferences;
- Sponsorship of regional or statewide conferences; and
- Food or beverages (with extremely limited exceptions, refer to the [VOCA Allowable and Unallowable Costs and Services](#) document for more specific information.)

C. Training-Related Travel:

Allowable training-related travel costs include, but are not limited to, mileage, parking, airfare, meals, and lodging to attend victim advocacy-related training. Programs should first look for available training within their immediate geographical area to minimize travel costs. Sub-recipients must use the most economical means of travel when using VOCA funds. *Any training outside of Oregon must be pre-approved by your fund coordinator and budgeted in your subaward.*

Sub-recipients must reimburse travel expenses based on the agency travel policy, but **at rates that do not exceed the federal per diem rates** (found at www.gsa.gov/perdiem). *VOCA funds cannot be used to cover lodging if the Government rate is not available.*

NOTE: *State of Oregon per diem rules apply with regard to meals (see box below).*

Sub-recipients must follow provisions included in the [DOJ Grants Financial Guide](#) (3.9 Allowable Costs, Travel) and the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ([2 C.F.R. §200.474](#)).



- **State of Oregon per diem rules for meals:**

- **Non-overnight trips:**

- lunch **NOT** reimbursed;
- Dinner and breakfast are reimbursed as long as on travel status a **minimum of 2 hours before** beginning of normal work shift **or 2 hours after** the end of normal work shift.

- **Overnight trips:**

- days of travel between initial and final day receive 100% per diem **unless meals are included as part of the registration fee for a conference. Those must be subtracted.**
- first and last day meal allowances are prorated. The maximum meal percentage rate is determined by the “time of day” you depart and “time of day” you return.
- **First day of travel - Leave:**

5:59 AM or before	6:00 AM to 12:00 Noon	12:01 PM to 6:00 PM	6:01 PM or later
100%	75%	50%	25%

- **Final day of travel - Return:**

5:59 AM or before	6:00 AM to 12:00 Noon	12:01 PM to 6:00 PM	6:01 PM or later
100%	75%	50%	25%

SECTION 5

REPORTING REQUIREMENTS

I. OVERVIEW

Sub-recipients must collect and report certain data in order to comply with both state and federal Performance Report requirements. Sub-recipients are strongly encouraged to develop data collection systems that offer maximum flexibility. Unless otherwise stated, **all data collected and reported for VOCA reporting purposes must be limited to those activities and services directly funded by the VOCA subaward and not to overall agency activities.** It is permissible, with DOJ CVSSD approval, to pro-rate certain information based upon a reasonable, accurate and logical basis i.e. FTE funded by the subaward.

Most sub-recipient reporting will be completed and submitted through the DOJ CVSSD E-Grants system. **VOCA PMT reports must be completed and submitted through the [OVC PMT system](#).**

II. REPORTING REQUIREMENTS

All reports will be submitted electronically through the CVSD E-Grants system according to the following schedule:

Reporting Period	Quarterly Reports		Semi-Annual Goals/Objectives E-Grants Progress Report	Annual Narrative
	E-Grants • Financial • Common Outcome Measures Reports Due	OVC PMT • Statistics Reports Due	Reports Due	• E-Grants Progress Report • OVCPMT Reports Due
October 1 – December 31	January 31		NA	NA
January 1 – March 31	April 30		April 30	NA
April 1 – June 30	July 20		NA	NA
July 1 – September 30	October 31		October 31	October 31

A. Financial Reports (FRs)

DOJ CVSSD administers funding for the VOCA Subaward Program on a reimbursement basis, meaning that subaward funds are paid to sub-recipient agencies **after** expenditures have been made. Payments to sub-recipients are made when DOJ CVSSD receives a Financial Report (FR). The FRs must be accompanied by the required quarterly, semi-annual and annual progress reports.

IMPORTANT INFORMATION REGARDING PAYMENTS

- FRs submitted without the accompanying required quarterly, semi-annual, and annual reports ***will not be processed for reimbursement until all reports have been submitted and reviewed.***
- It is the responsibility of the sub-recipient to respond to all requests for modifications or information made by DOJ CVSSD staff in a timely manner. Failure to comply will delay payment.

- Sub-recipients may not obligate funds, order goods, enter into contracts, or request purchase orders prior to the start of the subaward period.
- Reimbursement payments can be processed as quickly as two weeks or take up to one month. This is due to the fact that the drawing down of federal funds is done two or sometimes three times per month. The Federal government has a black out on draws the last five days of each month. A draw made on a Wednesday of one week will arrive at DOJ the following Tuesday and it is expected that payments can be issued by Friday.
- FRs 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 sub-recipient agency to ensure that only those organization members authorized to submit a FR do so.
- Sub-recipients must maintain supporting documentation for each FR submitted.

OTHER IMPORTANT NOTES ABOUT FRs:

1. Expenditures

- Expenditures should be reported for **actual approved and incurred expenses**, as opposed to dividing the total amount of the subaward into equal requests for reimbursement for the length of the subaward. While this is a convenient method of requesting payment it may not necessarily accurately represent the expenditures charged to a subaward.
- **All expenditures must coincide with the current approved budget submitted**, which will be one of the following:
 - the original budget submitted with the subaward application through E-Grants;
 - or
 - an amended budget submitted through E-Grants;
- DOJ CVSSD reimburses expenses quarterly unless otherwise agreed between DOJ CVSSD and the sub-recipient.
- Expenditures must be reported in the quarter in which the expenses were incurred.
- DOJ CVSSD reimburses only **actual and allowable** expenditures for goods and services purchased during the subaward period.
- DOJ CVSSD does not reimburse items that are not in the approved budget. DOJ CVSSD may withhold funds for any expenditure not budgeted or in excess of approved budget amounts.
- Failure of the sub-recipient to operate the program in accordance with the approved budget may result in suspension and/or termination of the subaward agreement.
- DOJ CVSSD will hold a sub-recipient accountable for any overpayment, audit disallowances, or any other breach of subaward agreement that results in a debt owed to the federal government.

2. DOJ CVSSD E-Grants: FR

The E-Grants FR 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.



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

Sub-recipients are responsible to adhere to the approved budget as referenced in the subaward agreement, or to request a budget amendment. **At no time may a budget modification change the scope of the original subaward agreement.**

3. Attachments

Copies of check stubs, timesheets, accounts, ledgers, or other supporting documentation should **NOT** be submitted with the FRs. This **documentation must be maintained at the program** and be separated by each budget category with the amounts clearly identified. These records will be verified during a programmatic and financial site visit and must be available upon request.

4. Advances

In special circumstances, checks may be issued in advance, but not for more than ten percent (10%) of the VOCA funds awarded in the subaward. **Advanced funds must be spent within ten (10) days of receipt.** Please contact your fund coordinator if you believe this may be needed and be prepared to provide an explanation for requesting an advance.

5. Unliquidated Obligations (Cash or Accrual Basis)

Agencies may complete FRs 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 subaward period for which payment cannot be made until after the subaward 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 subaward period, but not yet paid, must be reported on a separate statement which details the encumbered, but unpaid, obligations charged to that subaward. Agencies will then have an additional 30 days to pay those obligations and report the expenditure on a final FR. DOJ CVSSD E-Grants allows sub-recipients to submit an additional final FR 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 subaward period but not yet paid. ***This procedure***

may not be used to retroactively charge off previously unreported expenses in order to fully expend the VOCA subaward.

6. Final (Closeout) FR

Agencies have 30 days after the end of the last or final reporting period for any VOCA subaward (no later than October 31st) to report expenses, request reimbursement and reconcile any discrepancies. If a sub-recipient determines that VOCA *Competitive* funds will not be spent by the end of the subaward period, a *request for an extension must be submitted prior to the end of the subaward period*; otherwise, funds will be automatically deobligated and will no longer be available to the sub-recipient. For more information on amendments and extensions see pages 44-45.

B. Performance Reports

1. Statistical Report

Federal regulations require VOCA sub-recipients to report statistical data on a quarterly basis. This report is completed in the [OVC PMT system](#). Sub-recipients report **data for all VOCA subawards in one statistical report each quarter**. Sub-recipients must be able to distinguish between new and ongoing clients, on at least a monthly basis, to make collection for the correct reporting period easier. It is essential that the proper data be collected and reported; this data is used to comply with both state and federal requirements.

Sub-recipients must carefully consider who their VOCA subaward 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 VOCA subaward budget.”

Pro-Rating Statistics: All statistical data must be as accurate as possible. If the agency collects program wide statistics, pro-rating the statistics by the FTE of direct service staff funded by a specific subaward may accurately represent the number of victims served and services provided by subaward.

Sub-recipients should take the following into account when determining how to collect VOCA statistics:

- Contacting the public individually, in groups, in person or otherwise, with information about the availability of services may be an important outreach activity, but does not constitute the actual provision of direct services; persons contacted in this way are not clients unless they actually receive the direct services offered through the VOCA subaward; and
- Clients must be individually identifiable in order to ensure that data is unduplicated and to collect the necessary civil rights compliance information.
 - Although VOCA allows sub-recipients to report anonymous victims and the services provided to them, this should represent a small portion of the victims served by a program.

The following information is required for the OVC PMT Statistics Report:

- **Population Demographics** includes: Total number of individuals served, total number of anonymous contacts, number of new individuals served, and demographic information for those served.
- **Victimization Types:** Victimization types of the individuals served. Multiple victimization types per individual are allowed; and
- **Direct Services:** Number of services provided to individuals. A service is counted each time an individual is provided a service during a given report period.

At year end, the PMT report will also require responses to two narrative questions regarding challenges faced, as well as services the program could not provide.

See the [OVC PMT Information section](#) of the DOJ CVSSD website for definitions and further information and online training regarding PMT reporting.

Note: If a project subaward has been extended, a final statistical report covering the duration of the extension must be submitted within 30 days of the subaward closing.

2. Narrative Report

Federal regulations require that each sub-recipient must submit an annual narrative summary. Narrative reports are not a substitute for other specifically required report information (i.e., reporting staff turnover, approval of specific expenditures, etc.). The narrative will be completed in DOJ CVSSD E-Grants and will include the following information.

- Information pertinent to the annual reporting period ending September 30th of each year;
- Any new issues that hinder victim assistance programs in assisting crime victims in applying for crime victim compensation;
- Efforts to promote coordinated services;
- Efforts to serve federal crime victims;
- Notable activities to improve the delivery of services (i.e., needs assessments, training, etc.);
- At least one anecdote or case history illustrating ways in which VOCA funds have been used to assist crime victims; and
- Emerging issues or trends.



GO AHEAD – BRAG A LITTLE!

Tell us about the great work you're doing!

Your fund coordinators find it interesting and love to share your work with our Federal grant monitors and others in the field.

3. Goals, Objectives and Performance Measures Report (*Competitive subawards only*)

Sub-recipients are required to report progress achieved on the performance measures. DOJ CVSSD E-Grants has a specific reporting form submission of progress on the *Competitive subaward* goals, objectives and performance measures.

When submitting the final goals, objectives and performance measures report, state the final performance measures achieved for the entire subaward period and, if any target outputs or short term outcomes are not achieved, provide an explanation.

Note: If a *Competitive* subaward has been extended, a final narrative and goals, objectives and performance measure report covering the duration of the extension must be submitted within 30 days of the subaward closing.

4. Client Feedback on Common Outcome Measures

All VOCA sub-recipients are required to collect feedback on services provided using the common outcome measures listed below. *The client feedback will not be tied to the specific, VOCA funded project, but rather to all victim services provided by the program.* Programs are expected to have at least a 10% response rate from clients who receive surveys with the goal of a 90% positive response rate.

Programs may use Client Feedback Forms already in use in their agency. However, **all programs** are required to include the following measure that will be common across all VOCA funded programs:

“The program provided me with services that helped me make informed choices about my situation.”

In addition, programs must ask the following **appropriate** two discipline specific measures:

For programs serving primarily Domestic Violence or Sexual Assault victims:

1. After working with this agency, I have some new ideas about how to stay safe.
2. After working with this agency, I know more about resources that may be available, including how to access them.

For programs serving all types of victims of crime (including Prosecutor-Based Victim Assistance Programs):

1. As a result of the information I received from the Victim Assistance Program, I better understand my rights as a victim of crime.
2. The information given to me by the Victim Assistance Program helped me better understand the criminal justice system process as it relates to my case.

For programs serving primarily victims of child abuse:

1. The program staff treated my family with sensitivity and respect.
2. The program staff was supportive in helping me to access recommended treatment services for my child and family.

Sub-recipients 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, clients receiving services through the criminal justice process, or clients receiving follow-up services may be more appropriate. Sub-recipients must provide the following five choices for client response: Strongly Agree, Agree, Disagree, Strongly Disagree, and No Opinion. The forms are due quarterly, at the same time as the PMT reports and FRs. **Please contact your fund coordinator if you are unsure of which set of questions to include on your client feedback form.**

III. NON COMPLIANCE WITH REPORTING

All DOJ CVSSD subaward agreements provide that sub-recipients who fail to meet any of the reporting requirements included in this section (financial, narrative, statistical, or outcome measures) shall be considered to be in default under the agreement. In such a case, DOJ CVSSD has the right to terminate the subaward. DOJ CVSSD may also reduce the award proportionately to the period for which reports were not submitted in a timely manner.

IV. OTHER REQUIRED COMMUNICATION

A. Request for Amendments

Sub-recipients must request an amendment for programmatic and/or financial changes associated with a subaward as they occur during the subaward cycle. Consider the following when requesting an amendment:

- At no time may a program or budget modification change the scope of the original subaward 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 subaward.
- If a sub-recipient determines that any modification of the approved budget or the **extension** (extensions **ONLY** apply to competitive subawards) of a subaward period is necessary, a request should be made in E-Grants using the “Amendment Request” page.
- **The sub-recipient must obtain approval from DOJ CVSSD for any amendment requests prior to the change being implemented.** All amendment requests must be submitted at least 45 days prior to the end of the award period to be considered during the final quarter of a subaward.
- Requests submitted after the project end date or those that would require retroactive approval will be denied, unless the DOJ CVSSD Grant Management Section Manager grants an exception based on extenuating circumstances.
- DOJ CVSSD will review each amendment request and will approve on a case-by-case basis.

1. Budget Amendments

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

- Movement of funds:
 - i. For subawards totaling \$500,000 or less: Movement of funds that total more than \$3,000 in the Personnel, Services and Supplies, and/or Other Services categories;
 - ii. For subawards totaling more than \$500,000: Movement of funds that total more than \$5,000 in the Personnel, Services and Supplies, and/or Other Services categories; OR
- Adding a budget category or line item that did not exist in the original budget; OR
- Deleting an existing category; OR
- Extension of the project period (*ONLY applicable to **competitive** subawards*).

* 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 Personnel budget amendment request form and/or
- A Services and Supplies and Other Costs Budget Amendment Request form.

Both the Personnel and Services/Supplies and Other Costs amendment forms can be downloaded from the Amendment Request form in E-Grants and must be uploaded back on to the Amendment Request form once completed.

If approved, DOJ CVSSD staff will make the requested changes to the sub-recipients budget in the E-Grants system and the sub-recipient will be notified of the approval via a system notification in E-Grants.

Once approved, all subsequent FRs will automatically contain the amended subaward budget. Sub-recipients will not be able to submit FRs while an amendment request is in process so DOJ CVSSD encourages sub-recipients to pay attention to the timing of submission in relation to upcoming reporting deadlines.

2. Program Amendments

While not an all-inclusive list, the following changes 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 goal, objective or performance measure.

When requesting a *program amendment*, sub-recipients must provide a detailed explanation and justification on the Amendment Request form in E-Grants. The explanation must include a complete description of the requested change and the effect the change will have on the project.

Upon receipt of written DOJ CVSSD approval for a program amendment, a sub-recipient must reflect any revised goals, activities, and/or performance measures in all future progress reports submitted.

Deobligated Funds: DOJ CVSSD will deobligate any remaining funds not expended by the end of the subaward period. DOJ CVSSD will send a letter to the sub-recipient informing them that funds have been deobligated and the subaward is closed.

For Competitive Subawards ONLY: Sub-recipients have the option to extend the original subaward period by completing the amendment process described in this section should *competitive* subaward funds not be expended.

B. Achievement of Operational Status/Subaward Commencement

All sub-recipients are required to implement their federally funded project within sixty (60) days of the beginning date of their subaward. Any sub-recipient not meeting this deadline must submit a letter to DOJ CVSSD describing: steps taken to initiate the subaward; reasons for the delay; and the projected operational date. If the project is not operational within ninety (90) days of the beginning of the subaward period, the sub-recipient must submit a second letter explaining the additional delay in implementation. The DOJ CVSSD may, after reviewing the circumstances, elect to terminate the subaward and redistribute the funds.

The sub-recipient must establish and maintain program records that document that subaward activities are in compliance with the approved budget narrative. These records must be readily available for review at the time of a site visit. This requirement is included in the VOCA subaward agreement(s).

C. Termination of a Subaward

A sub-recipient must immediately notify DOJ CVSSD if they need to terminate their subaward agreement (i.e., program closure). Sub-recipients can review more information on termination by sub-recipient or grantor (DOJ CVSSD) in the sample subaward agreement. This sample can be found on the DOJ CVSSD website at: <https://www.doj.state.or.us/crime-victims/grant-funds-programs/victims-of-crime-act-voca-assistance-fund/>

SECTION 6

FINANCIAL REQUIREMENTS

I. OFFICE OF JUSTICE PROGRAMS (OJP) FINANCIAL GUIDE

The Oregon Department of Justice, as State Administrative Agency of VOCA, and the VOCA sub-recipient, have an ongoing responsibility throughout the subaward period to faithfully uphold the public trust which accompanies the authority to expend public funds. Sub-recipients will therefore establish and maintain fiscal control and accounting procedures which assure that funds available for subawards are properly disbursed, adequately controlled and accounted for in a separate account. All organizations that receive VOCA victim assistance funds must adhere to the financial and administrative provisions set forth in the *OJP Financial Guide* as implemented by DOJ CVSSD. The guide is available via OJP's website at: https://ojp.gov/financialguide/doj/pdfs/DOJ_FinancialGuide.pdf

II. OMB CIRCULARS/CODE OF FEDERAL REGULATIONS PERTAINING TO FISCAL REQUIREMENT

It is the responsibility of the sub-recipient to comply with the federal guidelines contained in the appropriately relevant Circulars. Sub-recipients may obtain copies of the Office of Management and Budget (OMB) circulars from the address and link shown below.

The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

<https://www.whitehouse.gov/omb/information-for-agencies/circulars/>

Administrative Requirements

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

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

Cost Principles

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 subawards and contracts with educational institutions.

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

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 subawards and contracts with state, local and Indian tribal units of government.

Audit Requirements

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 subawards 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.

Sub-recipients shall also adhere to any fiscal procedures established by DOJ CVSSD.

The federal CFDA number for VOCA funded programs is 16.575.

III. AWARD REQUIREMENTS

A. Standards for Financial Management Systems

All sub-recipients are required to establish and maintain subaward accounting systems and financial records to accurately account for awarded funds. When applicable, these records shall include both federal funds and all matching funds of state, local, and private organizations. Sub-recipients shall expend and account for subaward funds in accordance with state laws and procedures for expending and accounting for their own funds.

1. Accounting Systems

Each sub-recipient is responsible for establishing and maintaining an adequate system of accounting and internal controls. Each sub-recipient is also responsible for ensuring that an adequate system exists for any subcontractors, when applicable. The sub-recipient is free to use any accounting system that they have established if the system meets the following minimum criteria:

- **Each subaward should be accounted for separately.** Each subaward is regarded as coming from a separate fund source and should be accounted for as such. All subaward records should reflect the subaward number listed on the award documents;
- **Entries in the accounting records should refer to manual documentation** that supports the entry and which can be readily located;
- **Receipts should be classified by source of funding** (i.e., the name and number of the subaward to which the associated costs have been charged). As a matter of

convenience, sub-recipients are encouraged to use the subaward number assigned by DOJ CVSSD, unless currently existing agency coding structures prevents this practice. If costs attributable to the subaward program include those from sources other than the federal subaward, such as match, donations, income earned by the subaward, or funds from other sources, this should be clearly noted on receipts;

- **Expenditures should be classified by the budget categories** included in the subaward application. All expenditure documents, regardless of type, must include the assigned subaward number. Non-federal matching funds required at the subaward level must be classified in these same budget categories;
- **The accounting system must provide adequate information** for the prompt and accurate submission of FRs;
- The accounting system should be integrated with an **adequate system of internal controls** to safeguard the funds and assets covered, check the accuracy and reliability of accounting data, promote operational efficiency and encourage adherence to prescribed management policies. **The internal controls should be documented in written procedures** and be followed consistently;
- The accounting system should include a **system of property records** for all equipment. At a minimum this should include information on the acquisition date, serial numbers, equipment value and funding source(s) used to obtain the items. For more information please see [Property and Equipment Requirements](#) on the DOJ CVSSD website.
- All required **financial records shall be maintained for six (6) years** from the date of the end of the federal subaward period. If questions from audits cannot be resolved within six years, records shall be maintained until all questions arising from audits have been resolved; and
- A file shall be kept on each VOCA subaward. The file should reflect the subaward number and should at least contain any items not contained in E-grants. These items should include:
 - a. Supporting documentation of any expenditures pertaining to this subaward (i.e., original receipts, invoices, etc.);
 - b. Documentation of employee and volunteer timesheets as pertains to the subaward;
 - c. Signed copies of any contract supported by the subaward;
 - d. Documentation for subaward match;
 - e. Documentation of received VOCA reimbursement checks;
 - f. Property records of equipment purchased with VOCA subaward funds, including serial numbers; and
 - g. Other pertinent information (i.e., correspondence with fund coordinator, memos from DOJ CVSSD, training information, etc.)

Additionally, sub-recipients might consider retaining the following items in addition to those listed above (these can be found in E-Grants): program application submitted for VOCA funds, VOCA subaward amendments or any changes to the subaward, VOCA Subaward Management Handbook, reporting requirements, monthly revenue and expenditure reports, correspondence, DOJ CVSSD reports such as site visits and

DOJ CVSSD Request for Application (RFA). **All subaward documentation must be retained for six (6) years past the end of the subaward.**

2. **Commingling of Funds**

All sub-recipients must maintain accounting systems that ensure that VOCA funds are not commingled with funds from any other source. Funds specifically budgeted and/or received for one subaward project may not be used to support another. Revenues and expenditures for each subaward should be separately identified and tracked within the sub-recipient's accounting system or records. Where a sub-recipient's accounting system cannot comply with this requirement, the sub-recipient shall establish a system to provide adequate fund accountability for each subaward.



- Funds **should not be commingled** on a program-by-program or project-by-project basis.
- **Individual accounts or cost centers** should be established to control the funds for each subaward.

Proof of this will be requested as part of a site visit or desk audit.

3. **Sub-recipient Accounting Responsibilities**

a. **Audit Requirements**

Sub-recipients must meet the necessary audit requirements contained in the OJP Financial Guide: https://ojp.gov/financialguide/doj/pdfs/DOJ_FinancialGuide.pdf. Non-federal entities that expend \$750,000 or more in federal funds (from all sources including pass-through sub-awards) in the organization fiscal year shall have a single organization-wide audit conducted in accordance with the provisions of OMB Circular A-133 (codified at 28 CFR Parts 66 and 70). Audits are due no later than nine (9) months after the close of each fiscal year during the term of the award. Non-federal entities that expend less than \$750,000 a year in federal awards are exempt from federal audit requirements for that year.

Audit costs for audits not required or performed in accordance with OMB Circular A-133 are unallowable. If a sub-recipient did not expend \$750,000 or more 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 subaward. Sub-recipients are not required to send copies of audits to DOJ CVSSD unless they are required to conduct single organization-wide audits.

b. **Reporting of Irregularities**

Sub-recipients are responsible for promptly notifying DOJ CVSSD of any illegal acts or irregularities and of proposed and actual actions, if any. Illegal acts and irregularities include conflicts of interest, falsification of records or reports, and misappropriation of funds or other assets.

B. Program Income

Any revenue generated by VOCA subaward activities is considered program income. DOJ CVSSD must give prior approval for a sub-recipient to apply the addition method to program income. *Sub-recipients do not need DOJ CVSSD permission to earn program income if they choose to apply the deduction method.* Please see the [CVSSD Program Income Policy](#) on the DOJ CVSSD website for further explanation of program income and DOJ CVSSD procedures and policies.

C. Property and Equipment

Inventory information on equipment purchased with VOCA funds must be kept in the sub-recipient's VOCA file. Sub-recipients shall establish a control system to ensure adequate safeguards to prevent loss, damage or theft to nonexpendable personal equipment. Any loss, damage or theft of nonexpendable personal equipment shall be investigated, fully documented and made part of the subaward file. DOJ CVSSD uses the federal definition of equipment: Tangible personal property having a useful life of more than one year and a per-unit acquisition cost of \$5,000 or greater.

At a minimum, property records must be maintained with the following:

- a description of the property,
- a serial number or other identifying number;
- source of the property, including the federal award identification number,
- identification of title holder,
- the acquisition date; the cost and the percentage of VOCA funds supporting the purchase,
- the location, use, and condition of the property, and
- any disposition data, including the date of disposal and sale price.

In the event the subaward recipient no longer receives a VOCA subaward, federal policies and procedures on the acquisition and disbursement of the equipment will apply. Please refer to the [Property and Equipment Requirements](#) document for more information.

Consistent with the national goal of expanding the opportunities for women-owned and minority-owned business enterprises, sub-recipients must take all necessary affirmative steps to ensure that women's business enterprises, minority businesses and labor surplus area firms are used when possible.

D. Procurement Standards

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. *Sub-recipients shall follow their own established procurement procedures and regulations, provided they minimally adhere to applicable federal and state guidelines and standards.* If a sub-recipient's established procurement procedures are less competitive than the federal requirements, the sub-recipient must adhere to the following more competitive procurement requirements:

- For small procurements of **\$10,000 or less**, sub-recipients may **solicit goods or services in any manner deemed practical or convenient**. A procurement may not be artificially divided or “split” so as to constitute a small procurement.
- For procurements **exceeding \$10,000 but not exceeding \$250,000**, sub-recipients should solicit **quotes or bids from at least three sources**.
- For procurements **over \$250,000**, sub-recipients must **formally advertise** the proposed procurement through an **Invitation for Bids (IFB) or a Request for Proposals (RFP)** process.

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

Sub-recipients must submit all IFBs and RFPs over \$250,000 that involve the use of federal or matching funds to DOJ CVSSD for review and approval prior to their issuance. Interagency agreements between units of government are excluded from this provision.

Sub-recipients must have written procurement procedures and these procedures must be made available to DOJ CVSSD for review during monitoring to assure adherence to applicable federal guidelines.

For more detailed information about federal procurement requirements refer to the [Guidance on the Procurement Process](#) document.

SECTION 7

SUB-RECIPIENT MONITORING

I. OVERVIEW

DOJ CVSSD monitors each subaward to ensure the sub-recipient is operating the project as agreed, that the sub-recipient is working toward its objectives, and that the sub-recipient is following appropriate federal fiscal procedures. Fund coordinators also provide technical assistance, offer program development guidance, and observe program activities while visiting programs. DOJ CVSSD monitoring includes financial and administrative risk assessments, one or more financial report verifications, policy and procedure reviews, and on-site visits. 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. On-site visits may be prompted by one or more of the following: routine time for a visit based on the risk assessment score (even though no programmatic concerns), concerns within the agency, or a request for a site visit by the sub-recipient. For more detailed information please refer to the [CVSSD Grant Monitoring Policy](#) and the [program monitoring checklist](#). In addition, the process flow chart is available [here](#).

II. FAILURE TO COMPLY WITH THE TERMS AND CONDITIONS OF A VOCA SUBAWARD

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

- Temporarily withhold cash payments pending correction of the deficiency by the sub-recipient;
- 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 subaward;
- Withhold further subawards for the agency or program; and
- Take other remedies that may be legally available.

DOJ CVSSD may, after reasonable notice, terminate or suspend funding for a sub-recipient organization that fails to conform to the requirements or objectives of the Victims of Crime Act, and/or that fails to comply substantially with the DOJ CVSSD subaward agreement. In that event, the sub-recipient is entitled to receive equitable compensation for satisfactory, authorized services completed as of the termination date.

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

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

In the event of a formal allegation or a finding of fraud, waste and/or abuse of VOCA funds, DOJ CVSSD must be immediately notified. DOJ CVSSD will then notify the Office for Victims of Crime. Suspension or termination of funds may be lifted when the subaward recipient organization has demonstrated substantial compliance. ***Termination or suspension action will only be taken as a last resort.***

**we can
help**

DOJ CVSSD is committed to assisting sub-recipients to realize the success of any given subaward and will utilize all reasonable means to resolve problems or address potentially critical issues.

Whenever possible, and when it is in the best interest of victims, DOJ CVSSD will provide assistance to sub-recipient agencies to prevent termination.

