

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

Grant Monitoring Policy



Attorney General Ellen F. Rosenblum
Oregon Department of Justice
Crime Victim and Survivor Services Division
1162 Court Street NE
Salem, OR 97301-4096
503-378-5348

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SECTION 1 INTRODUCTION TO MONITORING POLICY

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

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

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

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

Through proactive monitoring, CVSSD Fund Coordinators will:

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

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

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

Monitoring Components

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

1. **Risk Assessment:** All subrecipients will complete an Administrative Risk Assessment and a Financial Risk Assessment. Assessments must be completed with an application every two years¹ for the subrecipient's assigned primary CVSSD funding stream (please see Appendix A, Grant Monitoring Process, for identification of the three assigned primary CVSSD funding streams), and prior to finalizing grant agreements.
2. **Policies & Procedures Review:** All subrecipients will receive an Administrative Policies & Procedures Review and a Financial Policies & Procedures Review at least every four years. Subrecipients who are categorized as High Risk will be prioritized for Policies & Procedures Reviews ahead of those identified as low risk.
3. **Financial Report Verification:** All subrecipients will receive a Financial Report Verification at least once every grant cycle. Subrecipients who are categorized as High Risk will be prioritized for a Financial Report Verification ahead of those identified as low risk.
4. **On-Site Programmatic Review:** All subrecipients will receive an On-Site Programmatic Review. All non-competitive subrecipients will have a minimum of one on-site review every 4 years. Competitive-only or one-time subrecipients will have an on-site review as necessitated by their risk assessment score or as designated by the Fund Coordinator.

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

In addition, every Subrecipient will receive pre-award and ongoing post-award monitoring that includes:

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

¹ May be every three years for subrecipients only receiving three-year competitive awards.

SECTION 2 RISK ASSESSMENT

A. Risk Assessment Overview

Completing Risk Assessments in conjunction with the grant application creates a proactive system to ensure programmatic and fiscal success of all subrecipients. It is an acknowledgement that some may need additional assistance to implement an effective project and remain in compliance with federal regulations. The assignment of risk can vary throughout the grant period, depending on changing circumstances. The risk assessment is a tool to that can be used to create a high functioning program. This risk assessment will indicate the urgency with which an on-site visit should be conducted.

The Administrative and Financial Risk Assessments:

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

B. Processing Risk Assessments

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

1. Current subrecipients complete both Risk Assessments and submit them with their assigned primary CVSSD funding stream grant application in the E-Grants system every two years. Prospective subrecipients complete both Risk Assessments and submit them with a new application in the E-Grants system.
2. CVSSD Grant Specialists formally score risk assessments and enter scores into database.
3. CVSSD Fund Coordinators review the assessments, discuss results with subrecipients by phone, as needed, and add comments to the Risk Assessment.
4. Level of risk may determine order of completion of monitoring process.
5. Risk Assessments must be completed prior to issuance of a grant award.

Administrative and Financial Policies and Procedures review will occur every four years for low risk subrecipients. Subrecipients identified as high risk will be prioritized for Administrative and Financial Policies and Procedures review ahead of those identified as low or moderate risk.

In cases of “unique circumstances” such as a mass violence incident, natural disaster, or pandemic, CVSSD may extend the time frame within which a review is conducted as is deemed necessary under the circumstances. Any reviews not conducted within the time frame described above, will be completed by the end of the calendar year following the “unique circumstances”.

In cases of “unique circumstances”, as described above, fund coordinators may conduct remote “on-site” reviews using ORDOJ-approved online meeting platforms.

SECTION 3 POLICIES AND PROCEDURES REVIEW

A. Policies and Procedures Review Objectives

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

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

B. Financial Policies and Procedures Review

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

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

1. CVSSD grant staff will email the subrecipient a Financial Policies & Procedures Review notification letter no less than 30 calendar days before the scheduled review.
2. Subrecipients will be instructed to submit a series of documents that verify the results of the Financial Risk Assessment and demonstrate compliance with grant requirements.
3. CVSSD Fund Coordinator will review the submitted documents and ask for further documents or explanations as needed. A phone interview may be arranged to supplement the review.
4. After thorough review of the supporting documents, the CVSSD Fund Coordinator will either:
 - a) Request a follow-up plan to meet grant requirements; or
 - b) Approve the Financial Policies and Procedures Review.

C. Administrative Policies and Procedures Review

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

1. CVSSD grant staff will email an Administrative Policies & Procedures Review notification letter no less than 30 calendar days before the scheduled review.

2. Subrecipients will be instructed to submit a series of documents that verify the results of the Administrative Risk Assessment and demonstrate compliance with grant requirements.
3. CVSSD Fund Coordinators will review the submitted documents and ask for further documents or explanations as needed. A phone interview may be arranged to supplement the review.
4. After thorough review of the supporting documents submitted, CVSSD Fund Coordinators will either:
 - a) Request a follow-up plan to meet grant requirements; or
 - b) Approve the Administrative Policies & Procedures Review.

SECTION 4

FINANCIAL REPORT VERIFICATION

All subrecipients will receive a Financial Report Verification during an award period; however, timing may be based upon the Risk Assessment results.

A. Steps for a Financial Report Verification:

CVSSD staff will complete the following general steps for a Financial Report Verification. These steps are subject to change during the verification process based on findings that may arise.

1. CVSSD grant staff will email a Financial Report Verification notification letter approximately 30 calendar days before the end of the current reporting period, unless circumstances, as determined by the fund coordinator, necessitate a shorter notice period.
2. CVSSD grant staff will instruct subrecipients to initiate a quarterly financial report and upload in the attachments section a copy of their General Ledger for the current reporting period for each open grant award.
3. CVSSD Fund Coordinators will review the General Ledger(s) to determine which supporting documents they need for review. The requested supporting documents will pertain to at least one open grant award but may pertain to any or all open grant awards. Documents may include, but are not limited to check stubs, cancelled checks, timesheets, invoices, procurement documentation, and any other evidence to support grant expenditures. Subrecipients may be asked for additional documentation at any time during this review process. This request will be communicated in the Modifications section in the relevant quarterly financial report in E-Grants.
4. After a thorough review, CVSSD Fund Coordinators may request additional documentation or explanation for the documentation submitted.
5. Upon satisfactory conclusion of the Financial Report Review, subrecipients will be prompted to complete and submit their Financial Report.

B. Important information regarding uploading documents for Financial Report Verification

In order to expedite the Financial Report Verification process, it is imperative that subrecipients follow the guidelines outlined in their notification letter and communication in the modifications section of the financial report. All communication and sharing of supporting documents will take place in the

modifications page of the Financial Report in E-Grants, unless otherwise requested by a CVSSD Fund Coordinator.

C. Timing of the Financial Report Review

The CVSSD Fund Coordinator will ask subrecipients to upload their general ledger when they initiate their quarterly financial report. The quarterly financial report will not be approved until the completion of the Financial Report Verification process. This means that their quarterly payment will be held until the completion of the verification. Therefore, it is in the subrecipient's best interest to initiate the Financial Report Verification process immediately upon receipt of their notification letter.

In cases of "unique circumstances" such as a mass violence incident, natural disaster, or pandemic, CVSSD may extend the time frame within which a financial report verification is conducted, and may affect the order of process described above as is deemed necessary under the circumstances. Any financial report verifications not conducted within the time frame described above, will be completed by the end of the calendar year following the "unique circumstances".

SECTION 5 ON-SITE PROGRAMMATIC REVIEW

A. Overview

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

B. Pre On- Site Programmatic Review Actions

CVSSD Fund Coordinators will contact Program Directors to arrange dates and times for the phone interview and the On-Site Programmatic Review. Anticipate up to 2 hours for the phone interview and 3 ½ to 4 hours for the in-person site visit. Larger, more complex programs, programs with multiple grants, and/or programs with problems may warrant longer visits. Senior management, financial, business, accounting, and program officials should be available for discussions, as needed.

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

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

The CVSSD Fund Coordinator will provide subrecipients with instructions for the visit including a list of items to have available for review. The Fund Coordinator may ask for some documents to be sent via email for review prior to the on-site visit.

C. On- Site Programmatic Review Visit Expectations

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

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

In cases of "unique circumstances", such as mass violence incident, natural disaster, or pandemic, fund coordinators may conduct remote "on-site" reviews using ORDOJ-approved online meeting platforms.

SECTION 6 MONITORING OUTCOMES

A. Overview

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

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

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

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

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

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

CVSSD may, after reasonable notice, terminate or suspend funding for a subrecipient organization that fails to conform to the requirements or objectives of the grant funding, and/or that fails to comply substantially with the CVSSD grant agreement. In that event, the subrecipient shall be entitled to receive equitable compensation for satisfactory, authorized services completed as of the termination date.

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

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

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

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

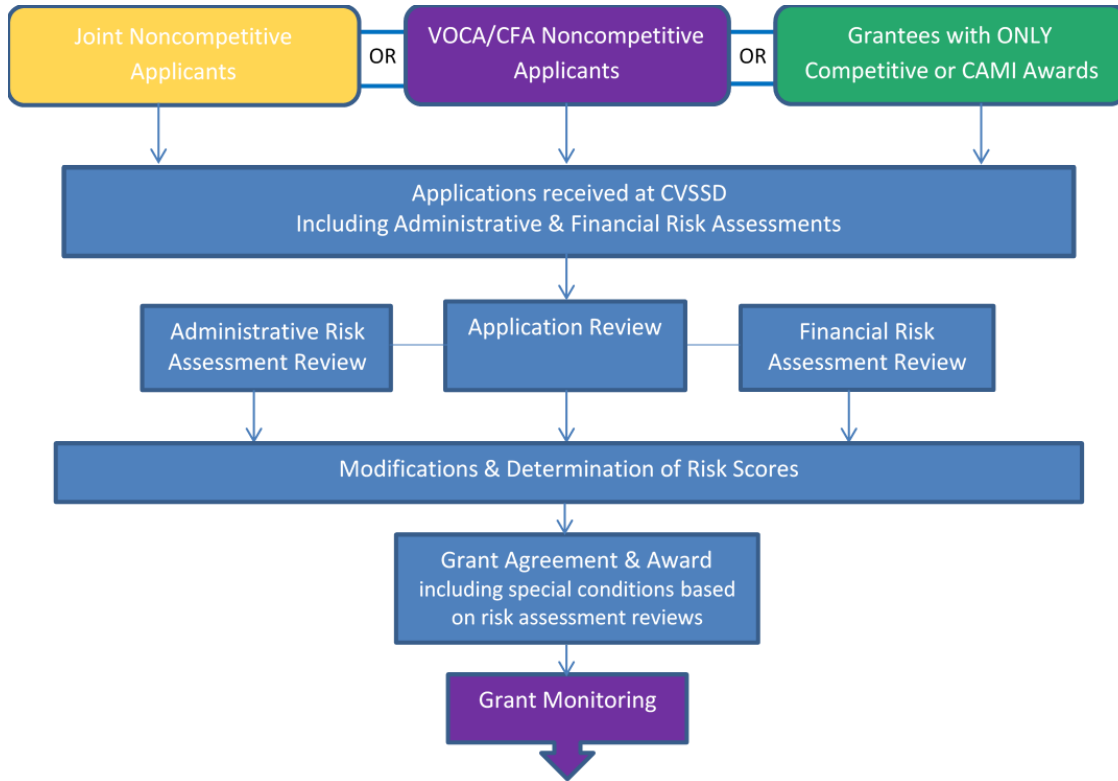
SECTION 7 RECORD KEEPING & DOCUMENTATION

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

The procedures developed by each grant must provide for the accurate and timely recording of the receipt of funds, expenditures and unexpended balances. Adequate documentation of each transaction shall be maintained to permit the determination, through a site visit or desk review, of the accuracy of the records and whether expenditures charged to grant funds are allowable. All records relating to each grant must be retained and available for inspection for a period of six (6) years following the end of the federal grant period (the grant end date).

APPENDIX A: MONITORING PROCESS

CVSSD Grant Monitoring Process



Administrative Policies & Procedures Review	Financial Policies & Procedures Review	Financial Report Verification	On-Site Programmatic Review
<ul style="list-style-type: none"> • Timing of each review based upon Administrative or Financial Risk Assessment and discretion of fund coordinator. • 30 day prior notice to subrecipient. • Subrecipient submits requested documents. • Fund coordinator reviews documents and may have conversation with subrecipient regarding documentation. • Fund coordinator approves administrative policies/financial policies or works with subrecipient to develop plan to meet requirements. 	<ul style="list-style-type: none"> • Timing of verification based upon Risk Assessment outcomes and discretion of fund coordinator. • Approximately 30 day prior notice to subrecipient. • Subrecipient initiates quarterly financial report (FR) in E-grants. • Subrecipient submits copy of general ledger with FR. • Fund coordinator reviews ledger to determine supporting documentation needed • Subrecipient submits requested supporting documents. • Fund coordinator reviews information & upon satisfactory conclusion, instructs subrecipient to complete and submit financial report. 	<ul style="list-style-type: none"> • Timing of review based on routine time for visit, risk assessment outcomes, concerns with agency, or request by subrecipient. • Fund coordinator contacts program to arrange dates and time for phone interview and on-site visit. • Fund coordinator conducts phone interview • Fund coordinator conducts site visit (in person or remotely). • Fund coordinator conducts exit conference after review complete to discuss outcome. • Fund coordinator sends summary letter. 	

Monitoring outcomes include: Satisfactory Compliance, Observations, Findings of Noncompliance

APPENDIX B: DOCUMENTS FOR ADMINISTRATIVE & FISCAL REVIEW

Below is an example of documents that will be requested during the CVSSD monitoring process. This is not an all-inclusive list. Additional documents may be requested as determined by the fund coordinator. *Subrecipients might consider utilizing a tabbed binder to organize their materials.*

PROGRAM

- Organization/Program Mission Statement
- Organization/Program Brochure

PERSONNEL – STAFF, VOLUNTEERS & INTERNS

- Organizational Chart with funding source(s), including vacancies
- Staff timesheets demonstrating how time is tracked per funding source
- Employee Handbook or Personnel Policy Manual
- Job descriptions for each staff position, regardless of funding source
- Job description for volunteers & interns
- Criminal Background check policy for staff, volunteers & interns
- Conflict of Interest policy for staff, board, volunteers & interns
- Volunteer application
- Volunteer training schedule with number of hours trained per topic
- Volunteer training manual (for viewing)
- All staff has met the required training criteria for their job title
- Staff & Board rosters in E-Grants is current, including job title & trainings

SERVICES

- Emergency Service policy of how expenditures are tracked
- Confidentiality Policy and Agreements
- Release of Information Form regarding confidentiality
- Written procedures for collecting CVSSD Common Outcome Measures
- Common Outcome Measure survey/form/card
- Sample of efforts made by organization/program to increase public awareness & community outreach, including tribes, rural and homeless population

OPERATIONAL POLICIES

- Breach of Personally Identifiable Information
- Grievance policy (including process for staff, volunteers, and clients to file complaints)
- Civil Rights policy and statement of non-discrimination
- Procurement policy & procedures
- Whistleblower policy
- Travel policy
- Records Retention policy
- Limited English Proficiency (LEP) policy
- Equal Employment Opportunity Plan (EEO) (if applicable)
- Disability Discrimination policy
- Drug Free Workplace policy
- Mandatory Child Abuse Reporting policy (if applicable)
- Policy regarding handling of Petty Cash in the office (if applicable)

VEHICLE, if purchased or leased using CVSSD funding

- Vehicle Insurance Certificate
- Vehicle Maintenance & Use policy
- Vehicle Maintenance & Use Record/Log

ASSESSMENTS (completed during application process or as requested by CVSSD Fund Coordinator)

- Administrative Risk Assessment
- Financial Risk Assessment

While subrecipients are not required to provide written documentation for the following list of services, they should be prepared to discuss how services are provided, to include:

- Intake
- Safety planning & assistance with basic needs
- Referrals for community resources
- Case management