

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

Grant Monitoring Policy



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TABLE OF CONTENTS

SECTION 1: INTRODUCTION TO MONITORING POLICY	3
A. INTRODUCTION	
B. MONITORING COMPONENTS	
SECTION 2: RISK ASSESSMENT	5
A. RISK ASSESSMENT OVERVIEW	
B. PROCESSING RISK ASSESSMENTS	
SECTION 3: POLICIES AND PROCEDURES REVIEW	6
A. POLICIES AND PROCEDURES REVIEW OBJECTIVES	
B. FINANCIAL POLICIES AND PROCEDURES REVIEW	
C. ADMINISTRATIVE POLICIES AND PROCEDURES REVIEW	
SECTION 4: FINANCIAL REPORT VERIFICATION.....	7
A. OVERVIEW	
B. GENERAL PROCESS	
C. EXPECTATIONS AND CRITERIA	
D. EXPENDITURE SOURCE DOCUMENTATION	
E. DETERMINATIONS	
F. NON-RESPONSIVE SUBRECIPIENTS	
SECTION 5: ON-SITE PROGRAMMATIC REVIEW.....	11
A. OVERVIEW	
B. PRE ON-SITE PROGRAMMATIC REVIEW ACTIONS	
C. ON-SITE PROGRAMMATIC VISIT EXPECTATIONS	
SECTION 6: MONITORING OUTCOMES	12
A. MONITORING OUTCOMES OVERVIEW	
B. FAILURE TO COMPLY WITH TERMS & CONDITIONS OF A GRANT	
SECTION 7: RECORD KEEPING & DOCUMENTATION	14
APPENDICES	
A. MONITORING PROCESS	15
B. DOCUMENTS FOR ADMINISTRATIVE & FISCAL REVIEW	16

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 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. Overview

Financial report verifications are conducted periodically to examine a subrecipient's specific financial activities for a given quarter. The process focuses on review of documentation supplied by the subrecipient to justify the expenses that are reported for that quarter, and to verify proper segregation of spending between various Federal awards and non-Federal expenditures. The verification functions as a 'point in time' review of the accuracy of the information submitted with a subrecipient's financial report. It is not intended to function as an audit of the entire organization.

CVSSD is responsible for making sure funds are obligated and spent as they were intended by the State or Federal award. The Fund Coordinator compares the expenses to the approved budget to ensure the subrecipient's spending follows what was approved for the award and is allowable. The Fund Coordinator examines expenditure source documents such as invoices and purchase orders, receipts, paid bills, payroll records, and canceled checks. The subrecipient may also be asked to provide bank statements, a description of the accounting system, a chart of accounts, and accounting reports (e.g., statements of activity and functional expenses). This is to ensure the expenses are true and properly accounted. Fund Coordinators conduct the reviews which result in final determinations of full, partial or no payment. In the case of partial or no payment determinations, CVSSD may conduct an out-of-cycle risk assessment of the subrecipient that may lead to a change in risk status. A partial or no payment determination may also warrant an immediate desk review procedure.

B. General Process

Financial report verifications are completed once every two years for each State and Federal award

CVSSD issues to its subrecipients. CVSSD issues combined or "joint" awards for most of its non-competitive funding. One award may contain up to three non-competitive funding sources. Some subrecipients have multiple non-competitive and competitive awards from CVSSD.

Reviews are scheduled by the CVSSD Compliance Team for the two-year period. Priority is placed on subrecipients who are considered high to moderate risk based on risk assessment evaluations provided by the subrecipient with the application for funds. Fund Coordinators are assigned to a portfolio of subrecipients and are responsible for the periodic reviews of those subrecipients' financial reports. The Compliance Team maintains a database that tracks due dates and completion dates of these reviews.

The Compliance Team schedules the financial report verifications, notifying both the Fund Coordinator and the subrecipient. Fund Coordinators notify the Compliance Team upon completion of financial report verifications no later than 45 days after submission of the financial report. The schedule for financial report verification is made available to the Fund Coordinators for planning purposes.

Subrecipients are notified 14 days prior to the close of the quarter when they are selected for review. The Compliance Team sends a written notice by email to the subrecipient of the review and copies the Fund Coordinator. The notification informs the subrecipient what documentation to prepare and submit with the report, the general process for review and approval, and remedies CVSSD may pursue should the subrecipient fail to comply with requirements of the financial report verification. The CVSSD EGrants portal contains pages and fields in the financial report form for the subrecipient to upload documentation for the review. Only digital documentation is accepted. Subrecipients are expected to redact personally identifying and confidential information from the documentation prior to submission to CVSSD.

CVSSD allows for 30 days to complete the financial report verification following the submission of the financial report. The subrecipient must be prepared to answer questions from the Fund Coordinator about the documentation provided. Fund Coordinators may request an online meeting with the subrecipient to expedite the review of the materials. Subrecipients must demonstrate compelling reasons for any requests to postpone the financial report verification. The authorized official for the organization, program or agency must make and explain the request in writing within seven days of the notice sent by CVSSD. The Fund Coordinator and the Compliance Team will determine whether to approve postponement of the review by one quarter.

C. Expectations and Criteria

Financial report verifications are designed to examine expenses, including payroll and other financial transactions, for accuracy and completeness. CVSSD Fund Coordinators request and review expenditure source documentation like purchase orders, invoices, receipts, cancelled checks, paid bills, and payroll. It is important for the subrecipient to have bank statements, a description of the accounting system, a chart of accounts, and accounting reports (e.g., statements of activity and functional expenses) available should questions arise.

When performing a review, Fund Coordinators look for unusual fluctuations in balances or activity for the period, reasonableness of the activity and deficit spending. Reviews determine what expense activity may need further investigation. When Fund Coordinators identify errors or unusual activity, the **subrecipient has 7 days to resolve the concern.**

Subrecipients may draw on more than one fund to pay for expenses such as payroll, rent, and administrative costs. It is then the subrecipient's responsibility to demonstrate how those expenses are pro-rated and assigned to a specific funding source. Since salary and personnel expenses are typically the largest expense, payroll activity is first to be reviewed for accuracy to verify that salary expenses on the general ledger for the employee are correct. Subrecipients are responsible for self-investigating and correcting any inaccuracies or incomplete financial information identified in the review process.

D. Expenditure Source Documentation

Adequate expenditure source documentation must reflect sufficient detail to determine, 1) what the funds were spent on, 2) when the spending occurred, and 3) who made the purchase. For salary and personnel expenses, documentation must answer 1) what hours are assigned to state and federal awards, 2) when the work was done, 3) who worked on the award, and 4) the date the time was

reported. Adequate source documentation is the foundation used to support accounting and cost records.

Salary and Personnel Expenses

- A. Payroll service receipt – detail of funds withdrawn
- B. Employee pay stubs
- C. Employee payroll time sheet
- D. EFT deposit acknowledgement or canceled paycheck
- E. Payroll detail report or summary

Other Expenditures

- Purchase request approved and signed by the authorized individual
- Invoices/purchase orders
- Receipts
- Canceled checks
- Proof of attendance
- Mileage tracking detail

Additional documentation may be required for funds pass through as contracts or subawards. This may include materials such as invoices and expenditure source documentation supplied by the contractor or subawardee to the subrecipient. Additional documentation may also be required as reflected in the general ledger such as statements of activity (by program, payroll summary, budget vs. actual) and statements reflecting expenses by specific fund for the period.

Inadequate expenditure source documentation may include:

- Credit card receipts that are not itemized and list only the total amount of the purchase
- Timesheets that do not provide sufficient detail to determine what hours were worked for which award
- Items without a receipt or source documentation, but listed on the financial report

E. Determinations

Determinations of the Fund Coordinators are recorded as notes in the EGrants financial report that is under review. Fund Coordinators may end a financial report verification with one or more actions, including:

- 1. Complete Approval:** Approve the financial report and its source documentation as submitted. Review is closed within 30 days.
- 2. Partial Approval:** This option allows for approval based on what documentation is available and adequate. Review is closed within 45 days. It requires the following steps:
 - Inform the subrecipient by email what can and cannot be approved based on the documentation provided, and the reasons why. This may include submission of additional documentation, revisions to the expenses reported, and other modifications as requested by the Fund Coordinator. Subrecipients have 7 days to resolve concerns from the time the financial report is returned for modifications in the EGrants system.
 - Fund Coordinators have 8 days to review the modifications made to the financial report, including a review of any new materials that are submitted.
 - Financial reports with complete and substantiated documentation are approved for full payment.

- Financial reports with incomplete and/or unsubstantiated documentation are approved for partial payment in the EGrants system.
- Unapproved expenses can be resubmitted with complete and proper documentation in a supplemental report marked for the same period. The same process and timelines apply to the supplemental report.

3. **Non-Approval:** A determination not to approve a full or partial payment is made when the financial report contains wholly incomplete and/or unsubstantiated documentation, and all attempts to communicate with the subrecipient and/or efforts to remedy concerns are unsuccessful. Review is closed within 45 days and the Fund Coordinator rejects the financial report in the EGrants system. Unapproved expenses can be resubmitted with complete and proper documentation in a supplemental report marked for the same period. The same process and timelines apply to the supplemental report.

Note: Completion of each step in the review process is marked by a status change of the financial report in EGrants. Should a financial report be rejected, CVSSD may conduct an out-of-cycle risk assessment of the subrecipient, which may lead to a change in risk status. See 2 CFR 200.206 and .332 for further risk assessment standards. Special areas of concern that are identified during verification or a change in risk status may warrant an immediate desk review by the Fund Coordinator. Significant concerns identified by the Fund Coordinator are referred to the CVSSD Compliance Team. For non-profit organizations operating in the State of Oregon, the Compliance Team will determine if concerns rise to the level of informing the DOJ's Charitable Activities Section.

F. **Non-Responsive Subrecipients and Remedies for Non-Compliance**

There are occasions when a subrecipient is non-responsive to the financial report verification requirements or otherwise non-compliant. At these times the State of Oregon, as a pass-through of Federal funds, is obligated to apply the 2 CFR 200 Uniform Guidance standards of remedies for noncompliance. See 2 CFR 200.339 and .340 for further remedy standards.

When a subrecipient is non-responsive to monitoring, specifically a financial report verification, CVSSD is obligated to apply the appropriate remedy for non-compliance. Remedies, as described in 2 CFR 200, may include, but are not limited to, temporarily withhold payments until action is complete, disallowed cost, and wholly or partially suspend or terminate award. CVSSD may also notify DOJ Charitable Activities Section or the Criminal Justice Division for further investigation. See also standard termination, default, no implied waiver, and cumulative remedies language in CVSSD's grant award agreements with all subrecipients.

The procedures for responding to a non-responsive subrecipient are:

1. Document the details of the nature of the non-responsiveness of the subrecipient, including steps taken to try to get responses and actions taken;
2. Coordinate the following remedy steps with the Compliance Team, section supervisor and/or other parts of DOJ as required;
3. Notify the subrecipient that remedies for non-compliance shall be taken by a set date unless specified actions are taken;
 - a. If subrecipient responds in a timely and appropriate manner, establish a corrective action plan that outlines the who, what and when of the required actions;

- b. If subrecipient remains non-responsive, take the appropriate remedy action as determined by the Fund Coordinator, Compliance Team and the section supervisor. See the CVSSD grant agreement and 2 CFR 200 for specific remedies for non-compliance.

Note: Initial remedy may not be the final remedy, as there may be escalating steps needed per 2 CFR 200.339 and .340 and the CVSSD grant agreement. Remedies taken may be associated with a change in risk status of the subrecipient. 2 CFR 200.332 should be consulted to see if an out of cycle risk assessment is warranted. A case of a non-responsive subrecipient may warrant the additional action of a Desk Review or on-site monitoring visit.

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.

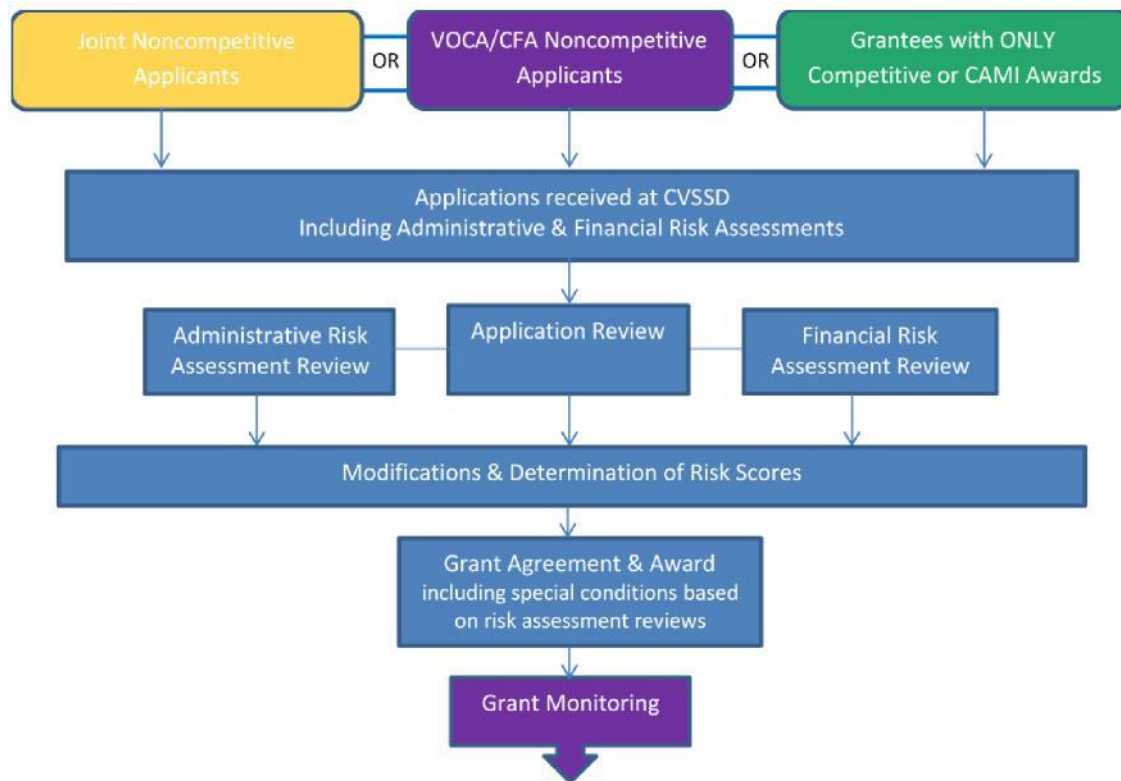
SECTION 7
RECORD KEEPING & DOCUMENTATION

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 Risk Process



Administrative Policies & Procedures Review	Financial Polices & 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. • 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. • Subrecipients notified 14 days prior to close of quarter. Notification informs subrecipient what documentation to prepare and submit. • Subrecipient initiates quarterly financial report (FR) in E-grants. • Subrecipient uploads supporting documentation in E-grants with quarterly financial report. • Within 30 days of submission, fund coordinator reviews information. • Subrecipient has 7 days to resolve any concerns resulting from the review. • Upon satisfactory submission, fund coordinator will approve 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 virtual) • Fund coordinator conducts exit conference after review complete to discuss outcome. • Fund coordinator sends summary letter.
<p align="center">Monitoring outcomes include: Satisfactory Compliance, Observations, Findings of Noncompliance</p>			

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

This policy and procedure is approved and implemented as of the date of this signature and has been distributed to staff responsible for managing Federal award funds.



Shannon Sivell

Director

Oregon Department of Justice, CVSSD

01/30/2023

Date