

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

Grant Monitoring Policy



Attorney General Dan Rayfield
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 rules from the Office of Victims of Crime (OVC) and the Office on Violence Against Women (OVW) for State Administrative Agencies (SAA). As the SAA for OVC and OVW funding, these rules call for the Oregon Department of Justice, Crime Victim and Survivor Services Division (CVSSD) to develop and implement a plan for monitoring subrecipient awards and activities. For CVSSD this includes: 1) self-assessments of financial and administrative capacity, 2) Fund Coordinator risk assessments, 3) financial report verifications, 4) financial and administrative policies and procedures reviews, and 5) on-site programmatic reviews (i.e., in person site visit). CVSSD's plan for monitoring is consistent with 2 CFR §200.332 which permits SAAs to impose specific subaward conditions upon a subrecipient (2 CFR §200.208).

CVSSD is the designated SAA for the Child Abuse Multidisciplinary Intervention Fund (CAMI), the Children's Advocacy Center Fund (CACF), the Criminal Fine Account (CFA), funding through the Children's Justice Act (CJA), the Community Violence Intervention (CVI) Program, the Oregon Domestic and Sexual Violence Services (ODSVS) Fund, the Sexual Assault Services Program (SASP), the STOP Violence Against Women Act (VAWA) Program, the Survivor Housing Fund, and funding through the Victims of Crime Act (VOCA). These funds are derived from state and federal sources, and this CVSSD policy includes monitoring requirements from those sources. CVSSD monitors subrecipient awards for compliance with applicable federal and state guidelines. CVSSD also determines if subrecipients are providing services outlined in their grant applications and in accordance with the CVSSD Grant Agreement, CVSSD's fund specific grant management handbooks or guidance, and the subrecipient's own established program policies and procedures.

CVSSD Fund Coordinators monitor and assist subrecipients throughout the course of the subaward period to implement the goals, objectives, and activities of the grant funded project. For this reason, CVSSD's monitoring process includes technical assistance and support to:

- 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 plans for implementation.
- Identify and resolve problems that may impede effective project implementation.
- Collect fiscal and programmatic data from subrecipients to report to specified federal or state granting agencies.

CVSSD prioritizes monitoring for subrecipients who are assessed to be higher risk, where issues of non-compliance have been identified, when the grant funded project objectives and activities are not achieved, or the subrecipient has specifically requested technical assistance.

Monitoring Components

CVSSD conducts four levels of program and fiscal monitoring. Pre and post award monitoring includes the following components:

1. **Subrecipient Self-Assessment:** The capacity self-assessment is a tool for subrecipients to assess the strength and effectiveness of their administrative and financial management practices. Subrecipients complete self-assessments every two years with applications for non-competitive funding or with each application for competitive funding.
2. **Fund Coordinator Risk Assessment:** CVSSD is required to review and evaluate potential risks posed by subrecipients prior to awarding Federal funds (2 CFR § 200.205). CVSSD Fund Coordinators complete risk assessments every two years with applications for non-competitive funding or with each application for competitive funding.
3. **Policies & Procedures Review:** All subrecipients will receive an Administrative Policies & Procedures Review and a Financial Policies & Procedures Review at least every four years or as needed based on risk level. CVSSD will prioritize Policies and Procedures Reviews for subrecipients who CVSSD has identified as high risk.
4. **Financial Report Verification:** All subrecipients will receive a Financial Report Verification every two years or as needed based on risk level. CVSSD will prioritize Financial Report Verifications for subrecipients who CVSSD has identified as high risk.
5. **On-Site Programmatic Review:** All subrecipients will receive an On-Site Programmatic Review. All subrecipients of non-competitive funds will have a minimum of one on-site review an average of every four years. Competitive-only or one-time subrecipients will have an on-site review as necessitated by their risk assessment score or as determined by the CVSSD Fund Coordinator.

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

1. Review of applications for CVSSD funding which include project descriptions, project budgets, performance measures, and other information relevant to the project.
2. Review of legal documents, as appropriate, during the application process (e.g., organization or program financial balance sheet, IRS Form 990, IRS Determination Letter, articles of incorporation, and Board Bylaws).
3. Review of quarterly financial report(s) and progress report(s) to CVSSD.
4. Support, training, and technical assistance for any issues identified during any monitoring step.

The timing and frequency of the monitoring may be dependent on the subrecipient’s overall risk or concerns about the program brought to the attention of CVSSD (e.g., someone within the program, a person seeking services, or by other parties). The timing and frequency of monitoring may also vary for special projects like the Trauma Informed Response Training and Community Violence Intervention Program.

**SECTION 2
CVSSD INTERNAL RISK ASSESSMENT**

A. Subrecipient Self-Assessment Overview

The capacity self-assessment is a tool for prospective subrecipients to assess the strength and effectiveness of their administrative and financial management practices. Self-assessment allows subrecipients to rate themselves in areas of governance, program policy, budgeting, and financial

management. Self-assessment is an opportunity for subrecipients to identify key areas for capacity development and set priorities for ongoing improvement efforts. Subrecipients complete self-assessments every two years with CVSSD applications for non-competitive funding or with each CVSSD application for competitive funding.

B. Fund Coordinator Risk Assessment Overview

CVSSD Fund Coordinators complete internal risk assessments in conjunction with applications for CVSSD funding. This is a tool for Fund Coordinators to measure the likelihood of success based on the subrecipient's past performance with CVSSD awards.

1. For subrecipients of non-competitive funding, Fund Coordinators conduct internal risk assessments every two years with renewal applications.
2. When competitive funding becomes available, Fund Coordinators conduct internal risk assessments on applications for competitive funds.
3. The subrecipients' level of risk is based on a score assigned by the CVSSD Compliance Team after the Fund Coordinator completes the internal risk assessment.
4. The score assigned by the CVSSD Compliance Team indicates whether the subrecipient is considered low, medium or high risk. The subrecipient's risk level may determine the Fund Coordinator's timetable for and frequency of post-award monitoring.
5. The subrecipients' risk assessment results may be reason for the Fund Coordinator to attach supplemental conditions to the grant award(s).

C. Processing Risk Assessments

Fund Coordinators will complete an internal risk assessment as follows:

1. With each renewal or competitive application, the Fund Coordinator responds "yes" or "no" to questions on the internal risk assessment.
2. The CVSSD Compliance Team formally scores risk assessments and enter scores into a database.
3. Fund Coordinators review the assessment scores and results. Fund Coordinators may discuss these results with subrecipients and recommend changes to their policies, procedures, and practices.
4. Fund Coordinators may prioritize post-award monitoring of subrecipients with higher levels of risk.
5. CVSSD internal risk assessments must completed prior to issuance of a grant award.

SECTION 3 POLICIES AND PROCEDURES REVIEW

CVSSD will conduct a Policies and Procedures Review on average every four years. The timetable for conducting these reviews may be affected by CVSSD's internal risk assessment results and/or CVSSD's capacity to conduct the review.

A. Policies and Procedures Review Objectives

CVSSD awards are subject to requirements and conditions that the subrecipient expressly agrees to upon acceptance of the award. Subrecipients must be prepared to provide information and documentation called forward by CVSSD as a part of its Policies and Procedures Review. CVSSD may request documentation in the form of policies, procedures, written practices, and other records supporting the activities conducted with CVSSD grant funds. CVSSD will review this documentation for compliance with the requirements and conditions of the CVSSD grant awards that the subrecipient receives.

CVSSD will conduct a review of administrative and financial policies and procedures on an average of every four years for subrecipients assessed as low to medium risk. CVSSD will prioritize or increase the frequency of Policy and Procedure Reviews for subrecipients identified as high risk. CVSSD reserves the right to extend the time frame for when Policies and Procedures Reviews are conducted for cases of unique or unforeseen circumstances (e.g., mass violence incident, natural disaster, pandemic, sudden changes in leadership, death, extended illness). CVSSD Fund Coordinators may also opt to remotely conduct policies and procedures reviews in conjunction with programmatic reviews using Oregon DOJ-approved online meeting platforms.

B. Financial Policies and Procedures Review

The objective of the Financial Policies and Procedures Review is to review the subrecipient's management of funds and any required non-Federal contributions. The review is to determine whether the subrecipient has an established accounting system integrated with adequate internal fiscal and management controls to provide full accountability for revenues, expenditures, assets, and liabilities. This process should provide reasonable assurance that the subrecipient is managing federally funded programs in compliance with laws, regulations, and provisions of the grant award. CVSSD will follow these general steps for a Financial Policies & Procedures Review. These steps are subject to change during the review process based on findings that may arise.

1. The CVSSD Fund Coordinator will email the subrecipient notice of a Financial Policies & Procedures no less than 30 calendar days before the scheduled review (unless CVSSD and the subrecipient agree upon a different timetable for notification).
2. Subrecipients must submit documentation demonstrating compliance with grant requirements and proof of adequate financial management and internal controls. The CVSSD Fund Coordinator will provide written guidance on what documentation is required.
3. The CVSSD Fund Coordinator will review the submitted documents and ask for further documentation or explanations as needed. Typically, a meeting with the subrecipient is arranged to discuss the documentation under review.
4. After thorough review of the documentation, the CVSSD Fund Coordinator will either:
 - a) Make recommendations for improvement of the subrecipient's financial policies and procedures; or
 - b) Require action on the part of the subrecipient to comply with requirements of the grant award; or
 - c) Approve the Financial Policies and Procedures Review.

C. Administrative Policies and Procedures Review

The objective of the Administrative Policies and Procedures Review is to review the subrecipient's administration of the grant funded program including its governing and operating policies and procedures. This process should provide reasonable assurance that the subrecipient is managing federally funded programs in compliance with the laws, regulations, and provisions of the grant award and that the required performance goals are being achieved. CVSSD will follow these general steps for an Administrative Policies & Procedures Review. These steps are subject to change during the review process based on findings that may arise.

1. The CVSSD Fund Coordinator will email the subrecipient notice of an Administrative Policies & Procedures Review no less than 30 calendar days before the scheduled review (unless CVSSD and the subrecipient agree upon a different timeline for notification).
2. Subrecipients must submit documentation demonstrating compliance with grant requirements and proof of adequate administrative functions. The CVSSD Fund Coordinator will provide written guidance on what documentation is required.
3. The CVSSD Fund Coordinator will review the submitted documents and ask for further documentation or explanations as needed. Typically, a meeting with the subrecipient is arranged to discuss the documentation under review.
4. After thorough review of the documentation, the CVSSD Fund Coordinator will either:
 - d) Make recommendations for improvement of the subrecipient's administrative policies and procedures; or
 - e) Require action on the part of the subrecipient to comply with requirements of the grant award; or
 - f) Approve the Administrative Policies and Procedures Review.

SECTION 4 FINANCIAL REPORT VERIFICATION

All subrecipients will participate in a Financial Report Verification every two years. The timing of these verifications may be affected by CVSSD's internal risk assessment results, and/or CVSSD's capacity to conduct the review.

A. Overview

CVSSD will conduct financial report verifications 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 CVSSD 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 and

credit card 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 for. 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

CVSSD completes financial report verifications once every two years for open awards that 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. CVSSD will conduct a verification on one federal award per subrecipient once every two years unless otherwise determined by the Fund Coordinator. If the subrecipient has only state awards, CVSSD will conduct a verification on the state award once every two years unless otherwise determined by the Fund Coordinator. CVSSD may select additional federal and state awards on which to verify expenses if there are risk factors or concerns present.

The CVSSD Compliance Team schedules reviews for the two-year period. Priority is placed on subrecipients who are considered high to moderate risk based on CVSSD’s internal risk assessments. CVSSD 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.

The Compliance Team makes the schedule for financial report verification available to the Fund Coordinators for planning purposes. **The Compliance Team notifies subrecipients 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 subrecipient uploads their supporting documentation into the CVSSD EGrants portal, which contains pages and fields within the financial report form for upload. Only digital documentation is accepted. CVSSD instructs subrecipients to redact personally identifying and confidential information from the documentation prior to submission to CVSSD.

CVSSD Fund Coordinators should complete financial report verifications no later than 45 days after the subrecipient submits 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 subrecipient 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 and credit card statements, a description of the accounting system, a chart of accounts, and accounting reports (e.g., statements of activity and functional expenses) available.

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.

Subrecipients may draw on more than one fund to pay for expenses such as payroll, rent, and administrative costs. It is 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 identifying 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 show 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. Employee pay stubs
- B. Employee payroll time sheet
- C. EFT deposit acknowledgement or canceled paycheck
- D. Payroll service receipt – detail of funds withdrawn
- E. Payroll register or journal

Other Expenditures

- Purchase request approved and signed by the authorized individual
- Invoices/purchase orders
- Receipts
- Proof of payment (e.g., canceled checks, credit card statement)
- Proof of attendance
- Mileage tracking detail

Additional documentation may be required for funds that 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 to substantiate expenses 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

CVSSD Fund Coordinators record their determinations as notes within 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.
2. **Partial Approval:** This option allows for approval based on what documentation is available and adequate. It requires the following steps:
 - Fund Coordinator informs 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.
 - Fund Coordinators review the modifications made to the financial report, including a review of any new materials that are submitted.
 - Fund Coordinator approves the financial report for full payment after validating the documentation supports the expenses.
 - Fund Coordinator requires the subrecipient to modify the financial report by removing expenses that lack appropriate or complete documentation. Fund Coordinator approves the financial report after the expenses in question are removed.
 - Subrecipients may resubmit unapproved expenses 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 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. Identification of special areas of concern during verification or a change in risk status may warrant an immediate desk review by the CVSSD Fund Coordinator. Fund Coordinators refer significant concerns they have identified 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 Oregon DOJ's Charitable Activities Section.

SECTION 5 ON-SITE PROGRAMMATIC REVIEW

All subrecipients will receive an On-Site Programmatic Review on an average of every four years regardless of CVSSD funding source. Timing of reviews may be affected by the CVSSD's internal risk assessment results, and/or CVSSD's capacity to conduct the review.

A. Overview

The objective of the On-Site Programmatic Review is to learn how the subrecipient is implementing the grant award, to observe grant activities, to discuss specific issues the program is experiencing, to review relevant on-site materials and systems, and to assess the subrecipient's planned versus actual progress. The on-site review is also an opportunity for the CVSSD Fund Coordinator to meet with staff, volunteers, Board members, and authorized officials. Most On-Site Programmatic Reviews are routine. Some may be prompted by a high score on the risk assessment, or by CVSSD's concerns about the subrecipient's management of the grant award, or as requested by the subrecipient. Prior to the scheduled on-site review, the Fund Coordinator may convene one or more structured pre-interviews online or by phone with the subrecipient.

B. Prior to the On- Site Programmatic Review

The CVSSD Fund Coordinator will contact the subrecipient to arrange dates and times for the On-Site Programmatic Review. Subrecipients may anticipate anywhere from 4 to 8 hours of time for the on-site review. Subrecipients with multiple CVSSD grant awards or those managing larger, more complex programs may warrant longer visits.

The On-Site Programmatic Review will include review of the following:

- Administrative activities not included in the Policies and Procedures Review
- Financial systems and internal controls not included in the Policies and Procedures Review
- Delivery of services
- VOCA PMT data (if relevant)
- VAWA STOP Annual Progress Report data (if relevant)
- ODSVS Domestic and Sexual Violence Statewide data (if relevant)
- Performance and outcome measures connected with a CVSSD grant award
- Procedures for client intake, safety, accessibility, grievances/complaints, and maintaining confidentiality, and if applicable, advocate/victim privilege
- Activities of the governing body, staff, and volunteers
- Community outreach, partnerships, and engagement (including plans required by CVSSD)
- Program evaluation activities
- Compliance with federal and state laws and regulations
- Compliance with grant award conditions

C. On- Site Programmatic Review Expectations

1. The CVSSD Fund Coordinator will provide subrecipients with instructions and materials to prepare for the on-site review. The Fund Coordinator may ask the subrecipient to submit additional

documentation after the Policies and Procedures Review and before the On-Site Programmatic Review.

2. The subrecipient will provide a meeting time, location, and address to the CVSSD Fund Coordinator. The subrecipient will arrange for the program director, project manager, and/or fiscal manager to participate in the on-site review for the purpose of answering questions related to their responsibilities.
3. A member of the governing board or designee, and/or authorized official for the subrecipient are requested to meet briefly with the CVSSD Fund Coordinator in person. The Fund Coordinator may elect to conduct online or phone interviews with members of the governing board and/or authorized officials who require other arrangements, as needed.
4. All CVSSD grant funded staff are requested to meet with the CVSSD Fund Coordinator. The Fund Coordinator may ask to interview staff privately as a group or individually. The Fund Coordinator may elect to conduct online or phone interviews with staff in field offices or who require other arrangements, as needed.
5. If applicable, one or more volunteers are requested to meet with the CVSSD Fund Coordinator. The Fund Coordinator may ask to interview volunteers as a group or individually. The Fund Coordinator may elect to conduct online or phone interviews with volunteers who require other arrangements, as needed.
6. The CVSSD Fund Coordinator may require seeing certain documentation, signage, or operating systems during the visit. Equipment and other purchases made by the subrecipient with CVSSD grant funds should be made available for inspection.
7. The CVSSD Fund Coordinator may discuss any findings and/or observations made, as well as preliminary corrective actions that must be taken, prior to concluding the visit.

CVSSD reserves the right to extend the time frame for when On-Site Programmatic Reviews are conducted for cases of unique or unforeseen circumstances (e.g., mass violence incident, natural disaster, pandemic, sudden changes in leadership, death, extended illness). Fund Coordinators may also opt to conduct programmatic reviews remotely using Oregon DOJ-approved online meeting platforms.

SECTION 6 MONITORING OUTCOMES

A. Monitoring Outcomes Overview

CVSSD will inform subrecipients of all findings throughout the monitoring process. Subrecipients may use this as an opportunity to ask follow-up questions and request technical assistance. The CVSSD Fund Coordinator will provide the subrecipient with a written summary of the monitoring activities and any findings, including strengths and areas of concern. A copy will be uploaded into E-Grants to become part of the grant award record.

The Fund Coordinator's written summary will demonstrate one of three possible outcomes to the monitoring process:

1. **Satisfactory Compliance:** This is reserved for subrecipients without findings of noncompliance. This means that CVSSD did not identify any areas (financial, administrative, or programmatic)

which were out of compliance with criteria found in relevant state or Federal statutes, rules or regulations, CVSSD grant award agreements, and CVSSD grant management handbooks, or contrary to good business practice.

2. **Observation:** This is reserved for subrecipients who are without findings of non-compliance but are observed to have areas of potential concern or weaknesses. CVSSD may offer recommendations for improvement, suggest resources for training and technical assistance, or request a follow-up meeting to gauge progress.
3. **Non-compliance:** This is reserved only for subrecipients who have findings of non-compliance. This may include findings of non-compliance with the criteria found in relevant state or Federal statutes, rules or regulations, CVSSD grant award agreements, or CVSSD grant management handbooks. The Fund Coordinator will summarize the findings of non-compliance, outline any timelines for corrective action, and describe other possible outcomes should the concerns go unresolved in the time provided.

B. Subrecipients Non-Responsive to CVSSD's Monitoring Requirements

There are occasions when a subrecipient is non-responsive to CVSSD's monitoring requirements or are 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 non-compliance. See 2 CFR 200.339 and .340 for further remedy standards.

When a subrecipient is non-responsive to monitoring, 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 Oregon's 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.

CVSSD Fund Coordinators will follow these procedures for responding to a non-responsive subrecipient:

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 CVSSD Section Supervisor or Compliance Team. The Section Supervisor or Compliance Team will determine if concerns rise to the level of informing the Oregon DOJ's Charitable Activities Section or other parts of Oregon 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. Specific conditions may be placed on current or future subawards as described in 200 CFR 200.208. A case of a non-responsive subrecipient may warrant the additional action of a desk review or on-site monitoring visit.

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

If a subrecipient significantly fails to comply with the general or specific terms and conditions of the CVSSD grant award agreement, CVSSD may take one or more of the following actions in accordance with 2 CFR Part 200:

- Place additional project monitoring.
- Establish corrective action plan(s) to address areas of concern.
- Require the subrecipient obtain technical or management assistance.
- Place special conditions on the subrecipient.
- Require payments as reimbursements rather than advance payments.
- Perform monthly check-ins with the CVSSD Fund Coordinator.
- Require monthly financial or progress reporting, or supplemental reports as requested.
- Temporarily withhold cash payments pending correction of the deficiency by the subrecipient.
- Disallow all or part of the cost of the activity or action not in compliance.
- Wholly or partially suspend or terminate the grant award.
- Withhold further grant awards for the project or program.
- 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 to what extent other grant funds may be affected, because of failing to comply with the terms and conditions of any awarded grant. For example, if something is a violation of a VOCA specific policy only, other funding may or may not be in jeopardy, but if there is financial mismanagement, presumably all funds could be at risk.

While CVSSD will not terminate funding 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, subrecipient must immediately notify CVSSD. CVSSD may lift suspension or termination of funds when the subrecipient 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. CVSSD will aid subrecipient agencies whenever possible, and when in the best interest of victims, 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 effective monitoring by CVSSD.

The procedures developed for 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 termination or expiration of the corresponding grant award agreement.

APPENDIX A: CVSSD MONITORING PROCESS

Overview



Monitoring Steps



Possible Monitoring Outcomes

