VOCA Financial & Administrative Training

2018
Oklahoma District Attorneys Council
Victims Services Division
Teleconference Information

➢ All teleconference participants are muted. Please reserve audio questions for the end of the presentation. If you would like to ask a question, please press *6 on your phone to unmute yourself so you may ask your question. When finished, please press *6 to re-mute your phone.
Webinar Information

You can ask a question of the host in the chat area:

Make sure you are sending to “everyone” so the monitor can see your question.
## VOCA at a Glance...

<table>
<thead>
<tr>
<th><strong>PURPOSE OF VOCA</strong></th>
<th><strong>PROGRAMS FUNDED</strong></th>
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</thead>
<tbody>
<tr>
<td>To provide funding to programs that provide direct service to victims of crime</td>
<td>175 VOCA projects funded in FY’18</td>
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<tr>
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<td>Total Awarded: $29,307,189 which is $4.47 million more than last year</td>
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</table>
VOCA: Victims of Crime Act

- Enacted into federal law in 1984
- Established the federal Crime Victims Fund
- Funding is generated entirely by federal fines, penalty assessments, forfeited appearance and bail bonds
- No taxpayer money is deposited into the Crime Victims Fund
DOJ Grants Financial Guide

- It is imperative that the Project Director and Financial Officer be familiar with the Department of Justice Federal Financial Guide

2018 DOJ Grants Financial Guide

- DAC has prepared a Financial & Administrative Guide for Subrecipients. Please review this document as well. [VOCA Financial & Administrative Guide](#)

- Note: VOCA does not allow for award adjustments without processing a GAN. The 10% rule in the DOJ guide does not apply
VOCA Federal Grant Program Rules

➢ In addition to the DOJ Federal Guidelines, DAC has prepared the following VOCA Federal Grant Program Rules for your use

Victims of Crime Act (VOCA Federal Grant Program Rules)

➢ It is imperative that the Project Director and Financial Officer be familiar with this document as well

KNOW THE RULES!
Reporting Waste, Fraud & Abuse

The subrecipient must promptly refer to DAC, and the Department of Justice (DOJ), Office of the Inspector General (OIG), any credible evidence that a principal, employee, agent, contractor, subcontractor, or other person has, in connection with funds under the subaward, 1) submitted a claim that violates the False Claims Act; or 2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.
Reporting Waste, Fraud & Abuse

Potential fraud, waste, abuse, or misconduct involving or relating to funds under the VOCA subaward should be reported to:

Office of Inspector General
U.S. Department of Justice
Investigations Division
425 New York Avenue, N.W., Suite 7100
Washington, D.C. 20530
Email: oig.hotline@usdoj.gov
DOJ OIG Hotline: 800-869-4499 (phone) or 202-616-9881 (fax)
Policies and Procedures

The following budget items require a detailed policy and must be uploaded in OKGrants (2017 policies must be updated).

- **Cell Phones**
- **Relocation (NEW)** – Security deposits must be returned to the VOCA Subrecipient program, NOT the client, to be used for other clients
- **Transitional Housing (NEW)** – Security deposits refunded by the landlord must be returned to the Subrecipient program NOT the client
- **Emergency Funds (NEW)**
  - **Gift Cards** – Clients and advocates must return receipts for the VOCA file (make copies as receipts fade over time). Any unused balance must be returned to the Subrecipient, this ensures the funds are used for allowable expenditures only. See the [2018 VOCA Financial & Administrative Guide](#) for more information
- **Vehicles** - Request the 13 item policy from DAC
Destruction of Records

- Record retention and access: Records pertinent to the subaward that the subrecipient at any tier must retain is 6 ½ years from the date of submission of the subrecipient’s final quarterly report. During such time, the subrecipient must provide access, including performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. 200.333.
Confidentiality

VOCA Victim Assistance Program Final Rule 94.115 Non-Disclosure of Confidential or Private Information

- Prior to 8/8/16, non-disclosure of confidential or private information only applied to client-counselor and research or statistical information. The new rule establishes confidentiality and privacy requirements to protect persons receiving services.

- The change requires State Administering Agencies and sub-recipients to reasonably protect the confidentiality and privacy of persons receiving services under this program and prohibits the release of personally identifying information or client information except in certain circumstances.

- The rule allows for information sharing of certain non-identifying data and court-generated information, law-enforcement generated information, and law enforcement- and prosecution-generated information in certain circumstances.

- Nothing in the rule prohibits compliance with legally mandated reporting of abuse or neglect.
Personally Identifiable Information (PII) Breach

- The subrecipient at any tier must have **written procedures** in place to respond in the event of an actual or imminent "breach" ([OMB M-17-12](https://www.whitehouse.gov/omb/m-17-12)) if the subrecipient creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "personally identifiable information (PII)" ([2 CFR 200.79](https://www.gpo.gov/fdsys/pkg/CFR-2021-title20-vol2/pdf/CFR-2021-title20-vol2.pdf)) within the scope of their VOCA-funded program or activity, or 2) uses or operates a "Federal information system" ([OMB Circular A-130](https://www.whitehouse.gov/omb/circulars)). The subrecipient's breach procedures must include a requirement to report actual or imminent breach of PII to DAC no later than **12 hours** of after an occurrence of an actual breach, or the detection of an imminent breach. **The written procedures to respond to an event of an actual or imminent breach should be uploaded in OKGrants.**

- The DAC has only 24 hours from the actual breach, or detection of an imminent breach, to report to our VOCA Program Manager in DC.
Allowable Services ....

REMEMBER! Before any service can be performed, that service must first be written in the VOCA grant, and approved by the VOCA Board.

Just because a service or costs is “allowable”, does not mean that service or cost will be funded, review your grant award. When in doubt, call DAC for guidance.
Allowable Services

Immediate Emotional, Psychological & Physical Health & Safety
- Crisis Intervention
- Hotline Counseling
- Safety Planning
- Emergency food, shelter, durable medical equip., RX (including treatment to prevent HIV/AIDS or other infectious disease), hearing aids, eyeglasses, doors, locks & windows
- Emergency Legal Assistance such as VPOs, Custody Orders, Visitation Rights

Mental Health Counseling & Care
- Out-patient therapy/counseling, includes referral to substance-abuse treatment, provided by a person who meets professional standards
Allowable Services (continued)

Personal Advocacy & Emotional Support
- Providing information, referral, advocacy & follow-up
- Identification of victim needs
- Traditional, cultural and/or alternative therapy/healing
- Resource identification
- Case Management

Facilitation of Participation in Criminal Justice & Other Proceedings Arising from Crime
- Advocacy & Accompaniment
- Child and respite care
- Travel, lodging and meals to allow victims who are NOT WITNESSES to participate in the criminal justice system
- Interpreters
- Property Recovery & Restitution Advocacy
Allowable Services (continued)

Legal Assistance
- Civil non-tort legal services to include, but are not limited to: divorce and child custody and support proceedings
- Motions to vacate or expunge the conviction of a victim, or similar actions, where the jurisdiction permits such an action based on a person’s being a crime victim

Legal Assistance (other)
- Protective Orders
- Campus Admin. Protection
- Family, custody, contract, housing
- Dependency matters for intimate partner violence, child abuse, sexual assault, and elder abuse
- Immigration assistance
- Intervention with creditors and others on victims behalf
Forensic Interviews
- Forensic Interviews for children and adults
- Interviews must be used not only for law enforcement, but to identify the victims need for additional services
- Interviews must be conducted in the context of a multidisciplinary investigation and diagnostic team or in a specialized child advocacy center setting

Forensic Medical Evidence Collection Examinations
- Medical Evidence Collection in domestic violence and child abuse cases only
- Due to the existence of a funding source available for forensic sexual assault exams (Sexual Assault Examination Fund), VOCA funds may not be used for individual sexual assault examinations
Allowable Services (continued)

Relocation Expenses
- When appropriate for the safety and well-being of a victim
- Moving expenses
- Security deposits
- Rental expenses (not mortgage expenses)
- Utility startup
- Agency policies that identify the criteria to be met for eligibility are required.

Transitional Housing
- Allowed for survivors who cannot safely return to their previous housing due to domestic violence, human trafficking, or abuse by a caregiver
- Travel related to moving
- Rental assistance
- Security deposits
- Utilities
- Other incidental costs
Costs Supporting Direct Services

Automated Systems & Technology
- E-mail Systems
- Information & Referral
- Case-tracking/Management
- Smartphones
- Computers
- Procurement of personnel & hardware if such procurement will enhance direct services

Contracts for Professional Services
- Must not be available within the organization (e.g., psychological or psychiatric consultation, legal services, interpreters)
- Rate must not exceed reasonable market rate
Costs Supporting Direct Svs. (cont.)

Coordination of Activities
- Coordination of victim notification systems
- Crisis response teams
- Multidisciplinary teams
- Coalitions to support and assist victims
- Salaries & expenses for such coordinators of these activities
- Volunteer training when services will be provided primarily by volunteers

Multisystem, Interagency, Multidisciplinary Response to Crime Victims
- Salaries and expenses of direct staff serving on child and adult abuse multidisciplinary investigation and treatment teams
- Coordination with federal agencies and Tribal programs
- Participation on statewide task forces and working groups
Costs Supporting Direct Svs. (cont.)

Restorative Justice
- Opportunities for crime victims to meet with perpetrators
- Safety & security of victim
- Appropriate support & accompaniment
- Debriefing opportunities for the victim
- Victim may withdraw from the process at any time.
- Prior approval from OVC may be necessary
Allowable Administrative Costs

Equipment and Furniture
- Procuring furniture and equipment to facilitate the delivery of direct services
- Mobile phones, computers, printers, video cameras, recorders for forensic interviews, two-way mirrors, colposcopes, digital cameras
- Furniture for shelters, workspaces and victim waiting areas

Indirect Costs
- Using negotiated rate with federal cognizant agency
- 10% de minimis rate based on organization’s modified total direct costs (MTDC)
- Guidance for requesting and spending indirect costs should be sought through the organization’s accountant
Administrative Costs (cont.)

Leasing Vehicles
- Vehicle must be essential to the provision of direct services
- Lease of a vehicle must comply with regulations found in the DOJ Federal Financial Guide and the Leased Vehicle Special Condition

Maintenance, Repair, or Replacement of Essential Items
- Maintenance, repair, replacement of items to maintain a healthy & safe environment for crime victims
- Routine maintenance and vehicle insurance on leased vehicles, if other funding sources are not available
Administrative Costs (cont.)

Operating Costs
- Supplies & Equip. use fees
- Property insurance
- Printing, copying, postage
- Courier service
- Brochures showing services
- Books and other victim-related materials
- Computer backup storage
- Security systems
- Websites and social media
- Telephone, web hosts & mobile device services

Organizational Expenses
- Prorated cost of rent
- Prorated cost of utilities
- Local travel for service providers
- Minor building adaptations to comply with ADA
- Other minor building modifications to improve program’s ability to provide services to victims
- Prorated share of audit costs
Administrative Costs (cont.)

Personnel Costs
- Staff and coordinator salaries and fringe
- Salaries and expenses of supervisory staff in a project, if VOCA Board determines staff is necessary to facilitate the provision of direct services.

VOCA Administrative Time
Cost of administrative time spent:
- Completing VOCA-required time/attendance sheets & programmatic documentation, reports, and statistics
- Collecting & maintaining crime victims’ records
- Conducting victim satisfaction surveys and needs assessments to improve services
Administrative Costs (cont.)

Project Evaluation
- Costs of evaluation of specific VOCA project in order to determine the effectiveness within limits set by DAC

Public Awareness
- Development of presentation materials, brochures, newspaper notices, PSAs for public awareness and education presentations
- Schools, community centers, and other public forums designed to inform crime victims of specific rights and services, and provide with referral to services
Administrative Costs (cont.)

Skills Training for Staff
- Exclusively for developing skills of direct service providers
- Includes paid staff and volunteers both VOCA-funded and not
- Manuals and books
- Videoconferencing
- Electronic training resources
- Other materials and resources

Training-Related Travel
- In-state training
- Regional training
- National training
- Registration fees
- Lodging (at federal rate)
- Per diem (at federal rate)
- Airfare
- Travel (at federal rate)

Remember: Only training-related travel approved in the grant is allowable.
Direct vs. Indirect Costs

- **Direct** costs are those for activities or services that benefit specific projects, e.g. salaries for project staff and materials required for a particular project. Because these activities are easily traced to projects, their costs are usually charged to projects on an item-by-item basis.
Direct vs. Indirect Costs

- **Indirect** costs are generally the expenses associated with doing business that are not readily identified with a particular grant, contract, or project, but are necessary for the general operation of the organization. Indirect costs are those for activities or services that benefit more than one project. Their precise benefits to a specific project are often difficult or impossible to trace. For example, it may be difficult to determine precisely how the activities of the director of an organization benefit a specific project.
It is possible to justify the handling of almost any kind of cost as either direct or indirect. Labor costs, for example, can be indirect, as in the case of maintenance personnel and executive officers; or they can be direct, as in the case of project staff members. Similarly, material such as miscellaneous supplies purchased in bulk - pencils, pens, paper—are typically handled as indirect costs, while materials required for specific projects are charged as direct costs.
Examples

Costs usually charged directly:
- Project Staff
- Consultants
- Project supplies
- Publications
- Travel

Costs either charged directly or allocated indirectly:
- Telephone charges
- Computer use
- Clerical and financial staff working with all agency programs
- Postage and printing
- Miscellaneous office supplies
Examples cont.

Costs usually allocated indirectly:

- Utilities
- Rent
- Audit and legal
- Administrative staff
- Equipment rental
Unallowable Costs

- Unallowable costs are costs that are not awarded in the grant application, and those costs specifically unallowable in the DOJ Grant Financial Guide.

- To manage unallowable costs, separate accounts must be established for these types of expenses.
Unallowable Costs cont.

Active Investigation and Prosecution Activities

- Direct involvement in investigating the crime and prosecuting an offender
- Witness notification and management activities
- Expert testimony at trial
- Expenses associated with testifying in court (victims and witnesses)
Unallowable Costs cont.

- Capital Expenses
- Construction
- Compensation to Victims (unless identified as an immediate health needs, as defined under allowable costs)
- Fundraising

- Lobbying
- Mortgage payments
- Property Losses and expenses
- Real estate purchases
- Research / Studies
- Management Salaries

ANY EXPENSE NOT APPROVED BY THE BOARD IN THE GRANT IS UNALLOWABLE. CONTACT DAC VICTIMS SERVICES IF A GRANT ADJUSTMENT IS NEEDED
COMMON SPECIAL CONDITIONS FOR 2018 GRANTS

- The VOCA Board approved several special conditions
- Special Conditions can be found on the Award Notice
- Please read special conditions of the grant and share that information with all who are working on the VOCA-funded project, including match personnel
- Not all grants have the same special conditions
**Award Notice with Special Conditions**

**AWARD NOTICE**

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<tr>
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<th>DUNS Number:</th>
<th>DAC CONTACT:</th>
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<tbody>
<tr>
<td></td>
<td>(405) 264-5006 or <a href="mailto:VODAhelp@dac.state.ok.us">VODAhelp@dac.state.ok.us</a></td>
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<th>CFDA:</th>
<th>Program Director:</th>
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| Grant Amount:      | $176,495          |
| Match Amount:      | $44,124           |

**Special Conditions:**

1) Mandatory Victim Assistance Training (VAT) online or equivalent training for newly hired victim advocates, should be obtained within 6 months of hiring, with certificates upload into OKGrants;
2) Advocates employed less than 12 months, with no formal victims services training or education, will attend trauma-informed domestic violence training and upload verification into OKGrants;
3) Personnel will help victims seek victims compensation.

This grant is subject to the terms and conditions set forth in the application which was submitted to the District Attorneys Council. The award is authorized by the District Attorneys Council (DAC). The subgrantees shall administer the project for which this subgrant is awarded in accordance with the applicable rules, regulations, and conditions as set forth in the federal guidelines, the Administrative Guide published by DAC, and the effective edition of the Department of Justice (DOJ) Office of Justice Programs, Financial and Administrative Guide for Grants. The subgrantee shall also administer the project in accordance with the Certified Assurances and Special Conditions of the award.

The subgrantee shall maintain separate accounts and accounting records for the subgrant funds, and shall maintain and furnish to DAC and DOJ upon request, detailed accounting and supportive records. The subgrantee shall file such reports relating to the subgrant as are required by DAC and DOJ.
Training Special Condition on All 2018 VOCA Subgrants

- Mandatory Victim Assistance Training (VAT) online or equivalent training for newly hired victim advocate, to be obtained within 6 months of hiring.

- Mandatory training every three years for non-attorneys providing direct victim services, unless there is already a mandatory continuing education requirement established for that profession (e.g. a victim advocate working in a DAs Office).
SPECIAL CONDITION ON GRANTS FUNDING ATTORNEY POSITIONS

• Applies only to VOCA-funded attorneys and those used as match for the VOCA grant
• Special condition requires attorneys attend trauma-specific training during the grant period, provided no such training has been previously attended
• Verification of training should be uploaded into OKGrants
DAC Training Team Contact

The District Attorneys Council Training Team:

- Coordinates free, quality training for VOCA subrecipients and law enforcement agencies
- Publishes a newsletter monthly listing all training available in the state. To see the list of trainings or to request a training, go to DAC Training Page
- To request training for your organization, contact the DAC Training and Outreach Team: DACTrainingandPublications@dac.state.ok.us
How Do I Show Training Completion?

- Scan completion certificates and save to desktop. When naming the document to save to your computer, reference employee name and type of training (e.g. JSmithVAT)

- In OKGrants Forms Menu, scroll to “Grant Correspondence” and use first “Uploads” link. Browse and paste training confirmations
Saved Files

- Files are now saved into a repository and cannot be deleted.
- Please create a folder on your desktop and save all of your VOCA documents as a backup.
Travel

- IRS Standard Mileage rate: 54.5 cents

- Current State Mileage rate: 47 cents (less than IRS standard mileage rate)

- Use map programs, such as Google Maps or MapQuest to document map miles for all in-state travel. Keep documentation and travel reimbursement claims in the VOCA binder

- Rates may be found at the GSA website
**Match**

- Subgrantees who have not been approved a Match Waiver are required to match grant funds by 25% of total award (divide award amount by 4). American Indian Tribes no longer have to match VOCA grants.

- Matching funds are considered the same as grant funds they must be used for allowable direct victims services.

- Match may be cash or in-kind or combination of both.

- If the match requirement cannot be met, the proportional share of grant funds must be returned to DAC and put back into the VOCA fund.

- It is not necessary to match in all funded categories.
Cash Match

*Any non-federal funds can be used to meet a cash match.*

CANNOT BE federal funds, VAWA funds for a VOCA grant or vice versa, TANF funds, etc.

CAN BE any other unobligated funding source such as: city, county, state, foundation funds, business/corporation funds, civic/church funds, United Way, individual gifts, or fundraiser proceeds.

Note: Personnel used as match would be an example of a cash match.
IN-KIND MATCH

*Budgeted items DONATED whose fair market value total your match*

Donations by an individual, group or business

- Donations must be:
  - relevant and integral to the project
  - prorated appropriately
  - documented as if a cash purchase

- Donations cannot be:
  - space owned by the subgrantee
Volunteers

- Utilizing volunteers is a requirement of receiving VOCA funds
- A waiver may be requested if all efforts to use volunteers have been exhausted

**IF USED AS MATCH:**
- Time sheets/activity logs must be kept
- Volunteer hours are calculated at minimum wage unless otherwise approved
- Current Paraprofessional Volunteer Rate is $24.69/hour ([www.independentsector.org](http://www.independentsector.org))
- Fall under same guidelines as VOCA funded employees
Reporting Match

- Do not report cash match on the Monthly Financial Report unless that match has been expended.
- All cash and in-kind match MUST be reported monthly. Do not wait until the end of the grant period and report all of your match for the entire project.
What's new for our VOCA team?
VOCA Compliance Officer- Amy Dunn

Why is this important?

Not only is it important to make sure that each of our subgrantees is compliant with their grants, we have to make sure we are compliant when administering the VOCA grant.
VOCA Compliance Purpose

The VOCA Compliance Officer ensures that all documents required by VOCA are submitted on time:

• MFRs, QFRs, SAR, & PMTs
• EEOP, Certified Assurances, Periodic Certification, SAM
• Monthly expenditures and Match to ensure the funds are being expended in a timely manner
• Ensuring subgrantees are compliant with special conditions
• Tracking of audit requests and final audit reports
Late Reports

- IMPORTANT: You must submit all MFRs, QFRs (even if there are no expenses to report) and quarterly PMT Reports, as required by DAC

- VOCA Board members receive a list of all subgrantees that have submitted 3 or more late reports throughout the grant year

- The initiation of a monthly request for funds (MFR) will not be permitted in OKGrants after the due date
Late Reports cont.

- First Year following late reporting
  Special Condition language:

  The subgrantee will submit all reports on time and understands that failure to do so may jeopardize future funding and/or result in grant suspension.

- Second Year following late reporting
  Special Condition language:

  The subgrantee will submit all reports on time and understands that failure to do so one time will immediately result in grant suspension and funds forfeited for the remainder of the grant year.
Roles in OKGrants

<table>
<thead>
<tr>
<th>Security Roles</th>
<th>Controls Access to Organization</th>
<th>Controls Access to Application</th>
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VOCA: Reimbursement Only

VOCA IS A REIMBURSEMENT GRANT!

Expenses on VOCA projects will be paid with another funding source and then “reimbursed” with VOCA funds each month.
Monthly Request for Funds

- Submitted electronically in OKGrants
- Due by the 15th of every month at 11:59 pm even if it is on a weekend or a holiday
- Report previous month’s expenses (even if $0)
- Request for funds will self-populate in OKGrants and will EQUAL the total amount of the previous month’s expenses

*Note: Be sure to change the status to “Submit”*
DA’s Offices

- VOCA 18 ledgers will run in the negative each month and “reimbursed” with VOCA funds
- Funds for County level purchases and Indirect costs can be requested using the Check Request Form
- Computer and Travel expenses are paid through DAC - please reference VOCA

### Request for Check Form

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<td>District Attorneys Council</td>
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<tr>
<td>ADDRESS</td>
<td>FACILITIES/EQUIPMENT RENTAL</td>
<td></td>
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<tr>
<td>421 NW 13th Street Suite 290</td>
<td></td>
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<tr>
<td>CITY, STATE, ZIP</td>
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<tr>
<td>Bud Webster</td>
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<td>SIGNATURE OF AUTHORIZED OFFICIAL</td>
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<td>TOTAL REQUEST</td>
<td>701.58</td>
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INVOICE APPROVED BY: 

Suzanne Breedlove, Victims Division Director

Date of Approval
Quarterly Financial Reports

- Submitted electronically in OKGrants.
- Due dates:
  - 1st quarter: 10/1 - 12/31 Year 1 due 1/15/19
  - 2nd quarter: 1/1 - 3/31 Year 1 due 4/15/19
  - 3rd quarter: 4/1 - 6/31 Year 1 due 7/15/19
  - 4th quarter: 7/1 - 9/30 Year 1 due 10/15/19

- Review Quarterly Reports and compare with your own ledger.
- Unlike other federal agencies, if the 15th falls on a weekend or holiday the report is still due on the 15th
OKGrants Demonstration
To initiate a MFR or a QFR, go to My Applications, Select Victims of Crime Act (VOCA) Application 2018 and hit the search button.
Scroll to Financial Documents and click on View Related Items
Select the item you wish to initiate or view the list of items already initiated and their status.
Grant Adjustment Notice (GAN)

- Revision of Approved Subgrant Budget
- Personnel Change
  - Authorized Official, Project Director, Finance Officer
- Grant Period Change (rare)
- Revisions to Goals and Objectives
Monitoring

- 2 Types of Monitoring
  - On-site visit (every other year or as needed)
  - Desk Review (every other year or as needed)

- On-Site Visit
  - Scheduled in advance
  - Includes both financial and programmatic review

- Desk Review
  - Financial only - records are requested to be sent to DAC for a specific time period
Risk Assessment

- VOCA Staff has established a Risk Assessment to help determine a monitoring schedule. The following criteria are considered on each grant:
  - Total amount of award
  - Years of previous grant experience
  - Frequent turnover of staff
  - Financial management issues
  - Significant findings or questioned costs
  - Recurring or Unresolved Findings
  - Programmatic Noncompliance
  - Forfeiture of funds
Risk Assessment Results

The risk level determines the frequency of monitoring in both on-site and desk reviews.
Top Monitoring Findings

- Goals and Objectives are not measurable
- Not indicating split in funding sources for split funded employees on timesheets
- Lack of timesheets/activity logs for volunteers and VOCA funded match staff
- VOCA funded staff are not familiar with the goals and objectives of the grant and their expectations
- Submission of late reports
- Lack of proper documentation
- Grant funds were used for expenses that were not awarded by the VOCA Board
Top Monitoring Findings cont.

- Failure to upload requested documents, such as VAT confirmation, personnel form and inventory forms
- Failure to have proper policies and procedures
- Failure to keep separate accounting of VOCA funds
- VOCA funded staff performing unallowable activities
- Unallowable expenditures
  - (non-emergency food, giveaways etc.)
Top Monitoring Findings cont.

In order for a contract to be adequate and allowable, both consulting and subcontracting agreements should:

- Include a description of the service(s) to be performed
- Detail the performance period and associated costs
- Indicate the method and timeline for invoicing
- Include termination provisions
- Invoices from consultants and subcontractors should describe the dates work was performed, the work completed, and the VOCA grant number
Documentation

- Binder system is suggested, but not required
- Financial ledgers
- Timesheets: VOCA grant and match hours MUST be noted on timesheets
- Travel vouchers
- Receipts
## Sample Timesheet

| Month: | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | TOTAL |
|--------|---|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|
| CAMA   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| STATE  |   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| VOCA   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| Undesig|   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| TOTAL  |   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| FLEX Accrued |   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| Sub-Total |   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| Sick Leave |   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| Annual |   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| FLEX Used |   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |

### Sick Leave
- Weekend
- Holiday
- Weather
- Annual
- Comp

### CASA Fiscal Use Only
- Sick leave available: ___ hrs.
- Sick leave used: ___ hrs.
- Vacation available: ___ hrs.
- Vacation used: ___ hrs.
- Comp leave available: ___ hrs.
- Comp leave used: ___ hrs.

---

Employee Signature

Executive Director/Board President
Ledgers

- Ledgers must be kept tracking monthly VOCA deposits, expenditures, and cash match
- A separate ledger should be maintained for indirect costs
- Must match figures reported in monthly/quarterly reports
- Ledgers will be closely reviewed during monitoring visits/desk reviews
Other Forms Required for VOCA

Forms Contained in this presentation can be found online at the DAC Website
Property Inventory Form
(found on DAC website)

 Submitted for each piece of equipment purchased with VOCA or matching funds

This form is to be uploaded in OKGrants no later than 30 days after purchase of equipment.
Project Income Form

- Send form monthly to report any income earned as a result of the VOCA funded project.

- Examples: billing of clients, insurance and Medicaid

- Project Income must be used to further enhance the VOCA project and MUST be spent before drawing VOCA funds. The request for funds should be reduced if project income is not expended.
Personnel Form

- This form is to be completed within 30 days of the start of the grant period.

- List all employees funded with VOCA dollars regardless of percentage of time paid.

This form is to be uploaded within 30 days of ANY change in VOCA paid staff. All employees (not just the new person) need to be listed on the form each time.
Periodic Certification

- In addition to the DAC Personnel Form, this form is to be uploaded in OKGrants every 6 months only for employees who are 100% VOCA funded.

- Please complete and upload in OKGrants as follows:
  - Oct.-March - Upload by 4/30
  - Apr.-Sept. - Upload by 10/31

SET A CALENDAR REMINDER!
Goals, Objectives, Activities, and Evaluation
Where to Begin

- Mission Statement
- Narrative
- Job Description
- Performance Measurement Tool
# Goals and Objectives: A Comparison

<table>
<thead>
<tr>
<th>GOALS</th>
<th>OBJECTIVES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are broad</td>
<td>Are narrow</td>
</tr>
<tr>
<td>Are general intentions</td>
<td>Are precise</td>
</tr>
<tr>
<td>Are intangible</td>
<td>Are tangible</td>
</tr>
<tr>
<td>Are abstract</td>
<td>Are concrete</td>
</tr>
</tbody>
</table>
Sample Goal and Objective

To assure that proper services are available to underserved crime victims in order to increase their participation in the criminal justice system

- Provide information for five (5) Assistant District Attorneys regarding cultural sensitivity and issues relevant with specific underserved populations
Sample Goal and Objectives

Improve Court Advocacy services and support for victims of domestic violence and sexual assault through direct services and a formal Court Advocacy Program

- The Lead Court Advocate will provide 150 victims assistance with Court Advocacy services during the 12 months of the project by Sept. 30, 2018
- The Lead Court Advocate will provide supervision over the four county Court Advocacy program and Court Advocates for the 12 month project by Sept. 30, 2018
- The Lead Court Advocate will participate in 12 monthly CCR meetings within the four counties by Sept. 30, 2018
- The Lead Court Advocate will participate in 12 monthly MDT Meetings within the four counties (total of 36 meetings) by Sept. 30, 2018
Sample Goal and Objectives

CASA Program

Goal: To increase the number of deprived children served by a CASA advocate by recruiting, screening, training and assigning cases to new volunteer advocates.

Measurable Objectives

- CASA Volunteer Coordinators will recruit and screen 40 new CASA volunteers by July 31, 2017.
- CASA Volunteer Coordinators will conduct 5 CASA training classes and train 30 new CASA advocates by August 30, 2017.
- CASA Volunteer Coordinators will assign a case to 30 new CASA advocates by September 30, 2017.
Activities

Activities describe the steps that will be taken to achieve the objectives.
Example of Activities

- The Lead Court Advocate will assist victims with seeking Protective Orders, accompany them to hearings and trials, liaison with law enforcement and the District Attorneys office on their behalf; and provide referral and collaboration with the agency's Staff Attorney.

- The Lead Court Advocate will supervise the agency's four county Court Advocacy Program and supervise the Court Advocates.
Evaluation

* A new customer satisfaction measurement device.*
Where to Begin

- Surveys
- Focus Groups
- Outside Source
Why is all this important?

- Goals/Objectives are closely reviewed during a grant monitoring visit
- Evaluating whether goals/objectives are being met measures the effectiveness, efficiency, use, quality, and purpose of why federal funds are being expended
- It can help you!
The Office for Civil Rights Enforces

- Title VI of the Civil Rights Act of 1964 (race, color, national origin)
- Section 504 of the Rehabilitation Act of 1973 (disability)
- Title II of the Americans with Disabilities Act of 1990 (disability)
- Age Discrimination Act of 1975 (age)
- Title IX of the Education Amendments of 1972 (sex in educational programs)
- Program Statutes (e.g. Safe Streets Act, VOCA, JJDPA, VAWA) (race, color, national origin, sex, religion, disability, sexual orientation, gender identity)
Civil Rights Obligations
Civil Rights Non-Discrimination

- Does the agency notify program participants and beneficiaries that it does not discriminate on the basis of race, color, national origin, religion, sex, disability, age, sexual orientation, or gender identity, in the delivery of services?

- If so how? Is it included in posters, brochures or other program materials?

- Does the agency notify employees, prospective employees, & volunteers that it does not discriminate on the basis of race, color, national origin, religion, sex, disability, sexual orientation, or gender identity, in employment practices?

- If so how? Is it included on posters, dissemination of relevant orders or policies, inclusions in recruitment materials?
Civil Rights Discrimination Complaints

- Does the agency have written policies or procedures in place for notifying employees and participants on how to file complaints alleging discrimination by the agency? [Click here for DACs Procedures for Responding to Discrimination Complaints from Clients, Customers, Program Participants, or Consumers of the DAC or any DAC Subrecipient Organization.]

- Has agency had a finding of discrimination by a federal or state court or a federal or state administrative agency on the grounds of race, color, religion, national origin, or sex during the last three years?

- If yes, has agency complied with the requirement to submit the finding to the Office of Civil Rights? If so, what date was the finding submitted?

- If yes has the agency reported the finding to DAC?
Civil Rights Questions

- Does agency have 50 or more employees and receive DOJ funding of $25,000 or more?

- If yes, has the agency designated a person to coordinate compliance with the prohibitions against disability discrimination?

- If yes, has agency adopted grievance procedures that incorporate due process standards and provide resolution of complaints alleging discrimination based on disability in employment practices and the delivery of services? Click here for DAC’s Procedures for Responding to Discrimination Complaints from Employees of Sub-recipients.
Civil Rights- Religious Activities

- Does agency conduct religious activities as part of its programs or services?
- If yes, does agency ensure that it does not use federal funds to conduct inherently religious activities, and that such activities are kept separate in time or place from federally funded activities?
- If yes, does agency provide services to everyone regardless of religion or religious belief?
Civil Rights- Limited English Proficiency

- Has your agency taken steps to provide meaningful **access** to its programs and activities to persons who have limited English proficiency (LEP)?

- Does your agency have a written policy on providing language access services to LEP persons?

- At what point(s) might an LEP person interact with your agency?

- Is language assistance available at these points?
Limited English Proficiency

To avoid discrimination against LEP persons, subgrantees must:

- Take **reasonable steps** to ensure **meaningful access** to the programs, services, and information the subgrantee provides, **free of charge**

- Establish and implement **policies and procedures** for language assistance services that provide LEP persons with meaningful access

- **Click here** for DACs Policies & Procedures to use as a sample.

5 elements of a written LEP Policy:

- A process for identifying LEP Persons who need language assistance
- Information about the available language assistance measures
- Training for staff
- Notice to LEP persons
- Monitoring and updating the LEP policy
What are language services?

Provide oral language services and Provide translation of written materials.

Insure Interpreter Competency
Usually family members, friends, and uncertified co-workers are not appropriate.

Safe Harbor Provision
If 5% or 1,000 (whichever is less) of population is LEP, **VITAL** documents must be translated.

However, if 5% represents fewer than 50, then written notice of free written translation upon request must be provided.
Civil Rights Training

- Does agency conduct any training for its employees on the requirements under federal civil rights laws?

- DAC will be providing training this fall

- Office for Civil Rights – [Civil Rights Pre-Bid Training for Grantees](#)
What is an Equal Employment Opportunity Plan (EEOP)?

- Is a 2 year plan that will need to be uploaded into OKGrants each year the plan is valid
- If you do not have a current EEOP, you can find the instructions in OKGrants under the EEOP tab

Note: We do not have access to the EEOP website. Please contact the EEOP helpdesk with assistance in filling out the EEOP form. [Click here for an FAQ regarding the EEOP.](#)
Does an agency have to prepare an EEOP?

Depends on . . .

- Funding (Safe Streets Act, VOCA, or JJDPA)
- Status of Organization (e.g., nonprofit)
- Amount of single award
- Number of employees
<table>
<thead>
<tr>
<th>If</th>
<th>Does the recipient need to submit a Certification Form to OCR?</th>
<th>Does the recipient need to develop an EEOP?</th>
<th>Must the recipient submit an EEOP Utilization Report to OCR?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recipient is a Medical or Educational Institution, Indian Tribe, or Nonprofit</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>Largest individual grant received is less than $25,000</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>Recipient has less than 50 employees</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>None of the above</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
</tr>
</tbody>
</table>

Prepare and Submit EEOP and Certification at [EEOP Reporting Tool Website](#)
In all materials publicizing or resulting from award activities, you must acknowledge awarding agency assistance. An acknowledgement of support shall be made through use of the following or comparable footnote:

“This project was supported by Award No.XXXXX awarded by the Department of Justice, Office for Victims of Crime.”
Reminders!

- Signed Grant Award Contracts due: September 30\textsuperscript{th}
- Subgrant Award Report (SAR) due: November 30\textsuperscript{th}
- First Drawdown (Oct. Reimbursement) due: November 15\textsuperscript{th}
- Special Conditions due: October 31\textsuperscript{st}
  - Requested MOUs
  - Leased Vehicle Special Condition
  - Revised Policies and Procedures (Gift Cards and transitional housing deposit returns)
  - Revised Goals and Objectives
Upcoming VOCA Schedule

- **December 3, 2018** - Open 2019 Grant Solicitation (grant period will be 10/1/19 - 9/30/20)
- **March 1, 2019** - Grant Due Date
- **March - June, 2019** - Analyze VOCA requests and work on Grant Adjustments (existing grants)
- **May - July, 2019** - Prepare staff recommendations and Board meeting documents
- **July 12, 2019** - Last date to submit GAN (if needed)
- **July 31 - Aug. 2, 2019** - VOCA Board meeting
- **August-September 2019** - Prepare award documents, conduct financial training, subgrantees advertise for new staff (if applicable) and prepare to close out 2018 grants.
- **October 1, 2019** - New Grants Begin
Subgrant Award Report (SAR)

- We will be going over the SAR page by page this afternoon
- If you are a new subgrantee, you must attend the afternoon session
- If you are not a new subgrantee, but have questions you are welcome to come back for the afternoon session
Quarterly Performance Measurement Tool (PMT)

- Monitors will be reviewing your data collection method at on-site visits as required by OIG
- New subgrantees must attend the afternoon session
- We will be covering the end of the grant period narrative questions during the afternoon session
- Effective October 1, 2017, the VOCA Board voted to include the PMT on the late reporting list

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**VOCA Performance Measures**

**Urgent:** E-mail complaint report to: VOCAMipients@state.ok.us within 30 days of the end of each quarter. The subject line of the e-mail should read: VOCAPMT-[2017-VOCAPMTCATEGORY-NAME]. Please use current form. All noncompliant forms will be sent back and asked to be re-submitted with current forms.

**District Attorneys Council**
421 N.W. 12th, Suite 290
Oklahoma City, OK 73103
405-252-5000
405-222-5020 (fax)
E-mail: VOCAMipients@state.ok.us

**My Subgrant Number:** 2017-VOCA-______ (e.g. 2017-VOCA-AGENCY NAME-198)
**Agency Name:**
**Person Completing Report:**
**Title:**
**E-mail:**
**Telephone number:**

1. **TOTAL number of individuals who received services during the reporting period.**
   **INSTRUCTIONS:** Count all individuals served by your organization with the use of VOCA plus match funds during the reporting period. This number should be an unduplicated count of people served during a single reporting period, regardless of the number of services they received or victimization types with which they presented. DO NOT count anonymous contacts here. They should be reported in question 2. If your organization only had anonymous contacts, enter zero (0).

2. **TOTAL number of anonymous contacts received during the reporting period.**
   **INSTRUCTIONS:** Count all anonymous contacts received by your organization through a hotline, online chat, or other service where the individuality of each contact cannot be established. If your organization did not have any anonymous contacts enter zero (0).

3. **Of the individuals entered in Question 1, how many were NEW individuals who received services from your agency for the first time during the reporting period?**
   **INSTRUCTIONS:** Report the number of NEW individuals served with the use of VOCA plus match funds for the first time during the reporting period. This number should be an unduplicated count of identified VOCA clients served during a single reporting period, regardless of the number of services they received or victimization types with which they presented.
   **For the first quarter of the 12-month grant period, all individuals that are continuing to receive services from the previous subgrant period should be counted as NEW.**

If your organization cannot track new individuals, please check the box below indicating such.

- We cannot track new individuals.

**Definitions:**
- Reporting period = Quarter for which data is being reported
- Subgrant period = 12-month project period

**Effective 9/10/2018**
Informing victims on the availability of crime victims compensation is a VOCA requirement. Direct victims to the Crime Victims Compensation Program Website for a claim form.

Contact DAC at (405)264-5006 for brochures, claim forms, posters (also available in Spanish); and Victims Compensation Program training for your organization.

Get to know the Victim Witness Coordinator in your local DA’s Office.
- Twitter: Username: OCVCSocial
- Facebook: Oklahoma Crime Victims Compensation
- LinkedIn: Oklahoma Crime Victims Compensation
- YouTube: Oklahoma Crime Victims Compensation Social
Contact

District Attorneys Council
421 N.W. 13th Street, Suite 290
Oklahoma City, OK  73103
405-264-5006 phone
405-264-5097 fax

VOCAhelp@dac.state.ok.us*

*Important: When emailing anyone at DAC or VOCA help regarding your grant, please put your grant number (e.g. 2018-VOCA-DAC-001) in the subject line and your agency name and contact information in your signature line
Suzanne Breedlove
Director of Victims Services
Suzanne.Breedlove@dac.state.ok.us

Joy Reeves
VOCA Administrative Assistant
Joy.Reeves@dac.state.ok.us

Amy Dunn
VOCA Compliance Officer
Amy.Dunn@dac.state.ok.us

Michelle Naylor
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Tina Harman
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Tina.Harman@dac.state.ok.us