

Required Uploads *VOCA*



Oklahoma District Attorney's Council

Required Uploads

Required Forms/Documentation

- Current Signed Certified Assurances
- Current IDC Rate (If negotiated directly with the federal government)
- Equal Employment Opportunity Plan or Exemption Certificate
- Audit single/independent
- Personnel Form (updated as needed)
- Employee Periodic Certification (for 100% VOCA Funded Persons due 2x year)
- Proof of Training (VAT and or Other)
- Determination of Suitability to Interact With Minors
- Civil Rights Training (Supportive Documentation due once per year)
- Personally Identifiable Information (PII) Breach Policy Agreement Form

Required Policies

(POLICIES MUST INCLUDE PROCEDURES)

- Determination of Suitability Policy
- Responding to Discrimination Complaints from Program *Participants* Policy
- Responding to Discrimination Complaints from *Employees* Policy
- Limited English Proficiency (LEP) Policy
- Personally Identifiable Information (PII) Breach Policy
- Confidentiality Policy

If Applicable:

Policies for Emergency Services, Transitional Housing, Relocation, Deposit Return, Gift Cards, Cell Phones, Vehicles, Teleworking, etc.



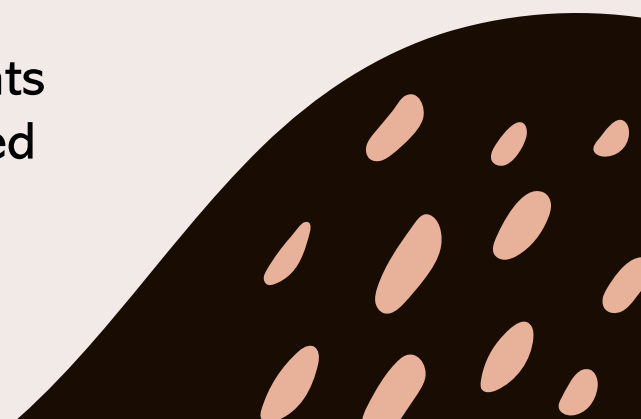
2024 Certified Assurances

CERTIFIED ASSURANCES ARE THE CONDITIONS OF
ACCEPTING A FEDERAL AWARD.

The 2024 Certified Assurances have been emailed out and must be signed and dated by the:

- Authorized Official
- Project Director
- Financial Officer

*2023 Certified Assurances have been uploaded to OKGrants please ensure the 2024 Certified Assurances are now signed and uploaded



Current Negotiated Indirect Cost Rate

If your agency has a federally negotiated IDC, documentation **MUST** be uploaded to OKGrants before any draw of IDC funds can be processed.

Please keep track of when the agreement expires. If current rate documentation is not uploaded at time of draw, MFRs will be returned to be amended to \$0.00 IDC.

Equal Employment Opportunity Plan (EEO Plan)

This is a 2-year plan that will need to be uploaded into OKGrants each year.

The Office for Civil Rights EEO Report Builder tool can be accessed here:
<https://eeop.ocr.ojp.gov/certsub/homepage>

This tool will provide a step-by-step method for preparing and completing your EEO Utilization Report and/or Verification Form.

Note: If you have questions regarding EEO Program requirements, visit the DOJ Office for Civil Rights (OCR) website at: <https://www.ojp.gov/program/civil-rights-office/equal-employment-opportunity-plans>. If you have problems navigating the system, please refer to the [EEO Report Builder Job Aid](#).

Non-profits and organizations with under 50 employees are EXEMPT and must provide a copy of their EEO Verification Certificate showing exemption reason.

Audits

If your agency receives \$1M or more in federal funds, a Single Audit is required and must be uploaded to OKGrants. All other subgrantees are required to upload their most recent Independent Audit.

Personnel Form

- List all employees funded with VOCA dollars.
- 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
- Must have an Effective Date

OKLAHOMA DISTRICT ATTORNEYS COUNCIL
Victims Services Division
PERSONNEL FORM

Grant Program: Victims of Crime Act (VOCA)

Subgrant Number: _____

Subgrantee Name: _____

Please list the names of the personnel within your agency whose salaries are funded with VOCA dollars. Also, please state the person's title, FTE, salary, and the percentage of their time that is paid with VOCA dollars. For example, if they are working full-time and their entire salary is paid only with VOCA funds, the FTE is 1 and VOCA percentage would be 100%.

<u>NAME</u>	<u>TITLE</u>	<u>SALARY</u>	<u>FTE</u>	<u>% OF TIME PAID WITH VOCA</u>

Explanation for the changes made above:

Effective Date _____

Oklahoma District Attorneys Council VOCA Grant - Periodic Certification



Agency Name: _____

Federal Award or Subgrant Number: _____

Certification

The person whose signature appears below hereby certifies for the period of

_____ (mm/dd/yy) through _____ (mm/dd/yy), _____ (employee name) worked solely on the above

award or subgrant with salary and wages 100% supported by the federal award or subgrant number listed above.

Employee Signature _____ Date _____

or

Supervisor Signature _____ Date _____

Only the Supervisor having first-hand knowledge of the work performed by the employee may sign instead of the employee.

This form meets the requirements of Title 2 Code of Federal Regulations (CFR) Part 225, *Cost Principals for State, Local, and Indian Tribal Governments*, Appendix B, *Selected Items of Costs*, for documenting time and effort reporting.

Periodic Certifications must be signed and filed after each six month period of employment. One form is required for each 100% VOCA funded employee.

After completion of each form, please upload into OKGrants for the Subgrant Number listed above.

Periodic Certification

- ❖ In addition to the Personnel Form, this form is to be uploaded in OKGrants every 6 months ONLY for employees who are 100% VOCA funded for an entire 6-month period.
- ❖ Please complete and upload in OKGrants as follows:

Oct.-March – Upload by 4/30

Apr.-Sept. – Upload by 10/31

PLEASE SET A CALENDAR REMINDER!



Proof of Training (VAT or other)

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

Upload Proof of Training(s) into OKGrants.



Determination of Suitability to Interact with Participating Minors

- The subrecipient must determine and document, in advance, the suitability of all persons who may interact with participating minors, including volunteers who may interact with minors.
- Background checks must be done no earlier than 6 months before the determination regarding suitability and then every 5 years thereafter.
- Certain individuals are prohibited from interacting with minors receiving services in the VOCA-funded program. The link below will guide programs on what must be checked and documented in order to comply with this Federal mandate. DAC is required to monitor documentation for compliance.

Click here to view the guidelines directly from OJP: <https://ojp.gov/funding/Explore/Interact-Minors.htm>

Determination of Suitability

Public sex offender and child abuse websites/registries including:

- The Dru Sjodin National Sex Offender Public Website (www.nsopw.gov)
- The website/public registry for each state and/or tribe in which the individual **lives, works, or goes to school**, or **has** lived, worked, or gone to school at any time during the past five years; and
- Record databases where the individual **is expected to, or reasonably likely to**, interact with a participating minor in the course of activities under the award.
- State/tribal Criminal record Databases.
 - A name-based search
 - Fingerprint search

This link will guide programs on what must be checked and documented in order to comply with this Federal mandate.

DAC is required to monitor documentation for compliance.

<https://ojp.gov/funding/Explore/Interact-Minors.htm>

Subgrantees must maintain background checks as well as a written policy describing the process of how your organization conducts them.

OKLAHOMA DISTRICT ATTORNEYS COUNCIL

Federal Grants Division

DETERMINATION OF SUITABILITY TO INTERACT WITH PARTICIPATING MINORS IN VOCA-FUNDED PROJECT

Subgrant Number: _____

Subgrantee Name: _____

All VOCA-funded personnel, match personnel, volunteers, consultants and contractors who interact with minors must have a criminal background check **every five years**. All of the requirements for this Certified Assurance can be found at <https://ojp.gov/funding/Explore/Interact-Minors.htm>. Please read the entirety of this Certified Assurance before completing this form and performing the criminal background checks.

List Criminal Background Website(s) utilized to determine suitability to interact with participating minors in the VOCA-funded Project:

Individual(s) Names	Identify Relationship to VOCA Project	Date of Criminal	Date Next Background
<u>Suitable to Interact With Minors</u>	<u>Employee/Match/Volunteer/Consultant/Contractor</u>	<u>Background Check</u>	<u>Check Will Be Due</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

I, _____ (Executive Director or Authorized Official), certify that criminal background checks have been performed on the above named individual(s) and the above named individual(s) associated with the VOCA-funded project are designated as suitable to interact with participating minors within the VOCA-funded project pursuant to the condition found at: <https://ojp.gov/funding/Explore/Interact-Minors.htm>. Note: Criminal background checks should be checked for all aliases provided by the individual. In addition, criminal background checks should be done for all states in which the individual lived, worked or went to school the 5 years prior to the background check.

Those receiving background checks should receive written notification in order to give the individual the opportunity to provide the required information for the criminal background check, pursuant to the subrecipient's written policies and procedures.

I understand that criminal background checks are required every five years and individuals will not be found suitable to interact with minors in the course of activities under the VOCA award if an individual:

- a) Withholds consent to a criminal history search required by this certified assurance;
- b) Knowingly makes (or made) a false statement that affects, or is intended to affect, any search required by this condition;
- c) Is listed as a registered sex offender on the National Sex Offender Public Website;
- d) To my knowledge, has been convicted whether as a felony or misdemeanor under federal, state, tribal or local law for any of the following crimes:
 - 1) Sexual or physical abuse, neglect, or endangerment of an individual under 18 at the time of the offense;
 - 2) Rape/sexual assault, including conspiracy to commit rape/sexual assault;
 - 3) Sexual exploitation, such as through child pornography or sex trafficking;
 - 4) Kidnapping;
 - 5) Voyeurism; or
 - 6) Is determined by a federal, state, tribal, or local government agency not to be suitable

Note: DAC is required to monitor compliance with this grant condition.

Signed this _____ day of _____, 20_____.

Signature of Executive Director or Authorized Official

Upload this Designation Form in OKGrants (preferred) or

Fax: (405) 264-5097

Mail: DAC, 421 NW 13th # 290, OKC, OK 73103

E-mail: VOCAhelp@dac.state.ok.us

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 (ADA) 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, JJDP, VAWA)
- (race, color, national origin, sex, religion, disability, sexual orientation, gender identity)

Civil Rights Training

Federal Civil Rights training is required for ALL agency employees, VOCA-funded staff, AND Volunteers.

Supportive training documentation is due once a year, must be completed within the grant period, and uploaded to OKGrants.

Office for Civil Rights – [Civil Rights Pre-Bid Training for Grantees](#)



**CIVIL
RIGHTS**

Procedures for Responding to Discrimination

Complaints from *Program Participants*

Discrimination on the grounds of race, color, national origin, religion, sex, disability, sexual orientation, or gender identity:

Your agency should have written policies or procedures in place for notifying participants on how to file complaints alleging discrimination by the agency.

This policy should include

- Your organizations name and contact information (only DA's Offices can use DAC policies for submitting a discrimination complaint)
- Procedures for handling a complaint
- Submitting the finding to the DAC as well as the Office of Civil Rights.
- DAC contact information should be provided should participants choose to report discrimination directly to VOCA.

Procedures for Responding to Discrimination

Complaints from *Employees*

Discrimination on the grounds of race, color, national origin, religion, sex, disability, sexual orientation, or gender identity:

Your agency should have written policies or procedures in place for notifying employees on how to file complaints alleging discrimination by the agency.

This policy should include

- Your organizations name and contact information (only DA's Offices can use DAC policies for submitting a discrimination complaint)
- Procedures for handling a complaint
- Submitting the finding to the DAC as well as the Office of Civil Rights.
- DAC contact information should be provided should employees choose to report discrimination directly to VOCA.

Limited English Proficiency Policy

5 elements of a written LEP Policy:

1. A process for identifying LEP Persons
2. Information about available language assistance (services/apps/staff)
3. Training for staff
4. Notice to LEP persons
5. Monitoring and updating the LEP policy

To avoid discrimination against LEP persons, subgrantees must:

- Take reasonable steps to ensure meaningful access
- Establish and implement policies and procedures for language assistance services



(PII)
***Breach Policy
Agreement
Form***

STATE OF OKLAHOMA

DISTRICT ATTORNEYS COUNCIL

421 NW 13th Street, Suite 290 • Oklahoma City, Oklahoma 73103

EXECUTIVE 405-264-5000 FAX 405-264-5099	FINANCE 405-264-5004 405-264-5099	GRANTS 405-264-5008 405-264-5099	VICTIMS 405-264-5006 405-264-5097	IT 405-264-5002 405-264-5099	TRAINING 405-264-5000 405-264-5099	UVED 405-264-5010 405-429-4274
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Requirement to report actual or imminent breach of personally identifiable information (PII)

The subgrantee must have written procedures in place to respond in the event of an actual or imminent breach (as defined in OMB M-17-12) if it –

- 1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of personally identifiable information (PII) (as defined in 2 C.F.R. 200.79) within the scope of an OVC grant-funded program or activity, or
- 2) uses or operates a Federal information system (as defined in OMB Circular A-130). The subgrantee's breach procedures must include a requirement to report actual or imminent breach of PII to the DAC or an OVC Program Manager no later than 12 hours after an occurrence of an actual breach, or the detection of an imminent breach.

Signature of Authorized Official

Date

Signature of Project Director

Date

Personally Identifiable Information

(PII) Breach Policy

- 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](#)) if the subrecipient creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "personally identifiable information (PII)" ([2 CFR 200.79](#)) within the scope of their VOCA-funded program or activity, or uses or operates a "Federal information system" ([OMB Circular A-130](#)).
- Policy 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. Once DAC is notified, we will send you the proper form to complete.
- This policy requires an agreement to report PII Breaches

Confidentiality Policy

VOCA Victim Assistance Program Final Rule 28 C.F.R. 94.115 Non-Disclosure of Confidential or Private Information

Elements of a compliant Confidentiality Policy:

- a) **Confidentiality.** Subgrantees, to the extent permitted by law, should describe how they will reasonably protect the confidentiality and privacy of persons receiving services under this subaward and shall not disclose, reveal, or release any personally identifying information (PII).
- b) **Release.** If release of information is compelled by statutory or court mandate, the recipient of VOCA subaward funds policy shall describe how they will make reasonable attempts to provide notice to victims affected by the disclosure of the information and what reasonable steps or procedures are utilized to protect the privacy and safety of the persons affected by the release of the information.
- c) **Information sharing.** Subgrantees policies should describe circumstances in which they may share— (1) Non-personally identifying data of demographic information in order to comply with reporting requirements; (2) Court-generated, prosecution-generated, and law-enforcement-generated information contained in secure governmental registries for protection order enforcement purposes or law enforcement and prosecution purposes.
- d) **Mandatory reporting.** Nothing in this section prohibits compliance with legally mandated reporting of abuse or neglect.

In no circumstances may a crime victim be required to provide a consent to release PII as a condition of eligibility for VOCA-funded services neither should any PII be shared in order to comply with reporting requirements

Other Policies

If applicable

- Teleworking
- Emergencies
- Transitional Housing
- Relocation
- Deposit Return
- Gift Cards
- Cell Phones
- Vehicles,
- etc.

Have Questions?

Please contact your grant monitor or email
VOCAhelp@dac.state.ok.us

We are happy to answer any questions you have and provide examples of policies that are relevant to your organization.

Thank you for all your hard work!

