



Victims Services Grant Programs Monitoring Tool

Monitoring is the process of reviewing, with staff of a grant-funded project, the project’s implementation, activities, performance and expenditures to determine if it is operating as proposed in the approved grant application and in accordance with grant requirements, conditions, as well as any applicable regulatory requirements, and to identify any technical assistance needs of the grant recipient. Monitoring may include review of the fiscal and programmatic aspects of a grant-funded project. The term “monitoring” is used to describe both the broad overall system of reviewing and tracking the use of federal and state funds, **and** the more specific day-to-day review processes to assure that a particular sub-sub-recipient is in compliance with federal or state rules and regulations, and is meeting the goals and objectives of the grant.

Please note this tool is designed to be printed and used during the site visit along with additional materials including documents to support program activities. Prior to the visit, DCJS staff will provide staff with a list of documents that are required to be available upon request. Obtaining and reviewing documentation that supports program activities and expenditures is a requirement of conducting an on-site visit. Documentation consists of any hard copy or electronic documents, including invoices, policies and procedures, logs, timesheets, etc., that provide evidence that an activity or expenditure reported by the sub-recipient actually occurred. The length of a site visit varies and is based on many factors, including the number and complexity of awards being monitored, the nature of the program(s), and the analysis of variables that inhibit a grant program from being in compliance and auditable according to all appropriate federal and state grant provisions. DCJS advises that most site visits can be completed, on average, between three to five hours. The grant monitor will then have 90 days from the end of the site visit to complete site visit documentation, including post-site visit letters. If the grant monitor identifies findings during the site visit, the sub-recipient will be issued a Corrective Action Plan and an appropriate time frame to bring the program into compliance.

Instructions:

Section I. General Information

Site Visit Information: A single Monitoring Tool may be used for the review of multiple grants under a grant program or sub-recipient, or for a specific grant. If multiple grants are being reviewed in one site visit, all grants must be listed in **Section I** below under “Grant Information.”

Sub-recipient:	Site Visit Date:
Grant Monitor:	Staff Present: See Below

Grant Information: List each grant being reviewed during this on-site monitoring

Grant Number	Grant Program	Project Period	Award Amount

Section II. Interview

Record the names and titles of those attending the site visit as well as the date of the meeting in the table below.

Staff/Authorized Official Name	Title	Date

Interview Notes: Interview summaries can be inserted in this section of the tool. For organizations with a significant number of grant funded staff, please create an addendum (MS Word document) to the tool with the additional interviews.

Section III. Administrative Review

The administrative review consists of an analysis of the sub-recipient’s grant documentation and evidence of compliance with all applicable conditions and grant requirements. If documentation is missing or an issue is found in any grant under review, the grant number and issue should be noted under “Issues Found and Documentation Collected/Supporting Notes,” including issues that require further documentation or technical assistance.



Administrative Review: File Review	Yes	No	TA Provided	N/A	Documentation/Procedures to Review, if applicable	Issues Found and Documentation Collected/ Supporting Notes
<p>1. Are the sub-recipient's grant files complete with all of the required information? If electronic files are maintained, all information must be accessible upon request.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Review the sub-recipient's grant files for the current grant year and past 3 grant years to ensure they have record of the following documents. If the items are not maintained in accordance with the below, describe the sub-recipient's steps taken to adhere to this requirement.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Approved Grant Application <input type="checkbox"/> Signed Statement of Grant Award (SOGA) <input type="checkbox"/> Approved Encumbrances (if applicable) <input type="checkbox"/> Approved Budget Amendments (if applicable) <input type="checkbox"/> Approved Status Reports & Claims <input type="checkbox"/> Supporting Documentation for all reported expenditures and performance measures <input type="checkbox"/> Inventory Log of Grant Funded Equipment (if applicable) <input type="checkbox"/> Grant Related Correspondence with DCJS <input type="checkbox"/> Evidence of Compliance with Award Conditions (per funding source) 	
<p>2. Is the sub-recipient maintaining an inventory list of equipment and/or major supplies purchased with grant funds? Does the list contain all of the required information?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>For all equipment and/or major supplies purchased with grant funds, the sub-recipient must maintain property records which include all of the following information. Review the record of inventory and cross-reference the actual inventory onsite. Confirm that the equipment is properly labeled with the applicable grant number. Obtain a copy of the inventory log and disposition policy.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Description of the property <input type="checkbox"/> Serial number or other identification number <input type="checkbox"/> Funding source of the property <input type="checkbox"/> Identification of the title holder <input type="checkbox"/> Acquisition date <input type="checkbox"/> Cost of the property <input type="checkbox"/> Percentage of Federal participation in the cost of the property <input type="checkbox"/> Location, use, condition of the property 	



					<input type="checkbox"/> Disposition information (if applicable)	
<p>If the approved award budget includes salary and fringe benefit costs, ensure that adequate payroll and time and attendance records are maintained. Review payroll and time and attendance records for each grant for the last three to six pay periods and determine if these documents adequately support the costs for salaries and fringe benefits charged to the grant. These records should clearly identify the specific project or programs worked on by each grant funded employee. If match is required, review all supporting documentation to verify reported matching funds.</p>						
Administrative Review/File Review	YES	NO	TA Provided	N/A	Documentation/Procedures to Review, if applicable	Issues Found and Documentation Collected/ Supporting Notes
3. Are key personnel performing duties as originally proposed? Are staff utilizing the required procedures to protect nondisclosure of confidential or private information, which includes creating and maintaining documentation of compliance, such as policies and procedures for release of victim information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Interview all grant funded staff and authorized officials. Through discussion, observations, and review of documentation, verify that grant funded staff are performing duties in accordance with the approved application and that any changes have been approved. Interview summaries can be inserted in the tool. For large organizations, please create an addendum to the tool with the additional interviews.</p> <p>Obtain copies of the following documents to verify compliance with applicable award conditions. If the sub-recipient does not have a copy of the following documents, describe what steps have been taken to protect victim information and obtain consent (if applicable).</p> <p><input type="checkbox"/>Confidentiality <input type="checkbox"/>Release of Information</p>	
4. Are actual hours worked accurately recorded on timesheets?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Obtain hard copies of timesheets from the most recent three to six pay periods for all grant-funded employees. The timesheets should report 100% of the employee's time, and actual hours worked on the award project. Grant funded	



					<p>employees should not enter hours based on the percentage of time allocated on the budget but should enter actual hours worked on grant funded activities (by source) within each pay period. If the employee is funded by multiple sources, time sheets should reflect distribution of time and include the name of each funding source. Timesheets should be signed (either in writing or electronically) by the employee and/or supervisor.</p> <p>If the sub-recipient is not maintaining timesheets, provide an explanation on the steps taken to adhere to this requirement or the technical assistance provided by DCJS.</p>	
5. Are personnel charges in line with the approved budget?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Review personnel timesheets and payroll allocations to ensure that charges related to staffing are in line with the approved budget using the following documents.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Personnel timesheets, payroll ledgers <input type="checkbox"/> Approved budget <input type="checkbox"/> Overtime approval documentation (if applicable) <p>If the sub-recipient's personnel charges do not align with the approved budget and supporting documentation, provide an explanation on the steps taken to adhere to this requirement or the technical assistance provided by DCJS.</p>	
6. Does the sub-recipient generate project income (funds generated as a direct result of DCJS grant-funded projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>If project income is generated from a direct result of DCJS grant-funded projects, has the sub-recipient reported the income to DCJS? Examples of project income might include service fees; client fees; usage or rental fees; sales of materials; and income received from sale of seized and forfeited assets (cash, personal or real property included).</p>	

Administrative Notes:



The following questions are developed to guide the financial review of the grant project. All sub-recipients are required to establish and maintain adequate accounting systems and financial records and to accurately account for funds awarded to them. They must have a financial management system in place that is able to record and report on the receipt, obligation, and expenditure of grant funds by source. Sub-recipients must properly track the use of award funds and maintain adequate supporting documentation including maintaining proper documentation for all paid grant and match staff and volunteer time reported. Further information is available in the DOJ Financial Guide at https://ojp.gov/financialguide/doj/pdfs/DOJ_FinancialGuide.pdf. If the sub-recipient is unable to provide evidence of compliance with this or the following administrative financial requirements, document technical assistance provided to the sub-recipient to bring the program into compliance.

Administrative Financial Review	Yes	No	TA Provided	N/A	Documentation/ Procedures to Review if Applicable	Issues Found and Documentation Collected/ Supporting Notes
7. Has the sub-recipient submitted a copy of the scheduled financial statement audit for the fiscal year that covers the grant award period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Review the most recent financial audit report and ensure that the audit has been submitted to DCJS. If the subrecipient is a local government or non-profit organization and expends \$750,000 or more in federal awards (from all sources) during its fiscal year, the subrecipient is required to submit the appropriate single or program specific audit in accordance with the provisions outlined in 2CFR Part 200 Subpart F.</p> <p>Review the auditor’s opinion and ask the sub-recipient to provide evidence of compliance with all audit recommendations.</p>	
8. Does the sub-recipient have a financial accounting system that can track the receipt, obligation and expenditure of funds by source? Does	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review the sub-recipient’s financial system, with the assistance of the finance officer or other staff responsible for financial accounting, to ensure that this requirement is met. The system should	



<p>the sub-recipient maintain documents supporting detailed expenditures made within each approved budget category?</p>				<p>properly account for all grant revenue and expenditures by source (i.e. federal, state, special, match). Review the report of accounting (cumulative budget to actual amounts for each approved budget category), as of the most recent quarter end. This will be in the form of a general ledger and trial balance or a financial statement of activities (non-profits) that provides a summary of the sub-recipient's revenues, expenses, and profits/losses over a given period of time. In some cases, this can also include a manual spreadsheet. Obtain a copy of the financial management protocol to include procedures for tracking and reporting grant funds.</p>	
<p>9. Are the sub-recipient's expenditures consistent with the approved application or subsequent budget amendments (if applicable)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><input type="checkbox"/> For each grant included in the compliance review, select one quarterly period per grant and review all supporting documentation. Request that the sub-recipient provide proper documentation for each expenditure in the form of purchase invoice, vendor receipt, payroll register, timecard, dates of training, description of training, travel authorization, etc. Cross-reference the supporting documentation with the total amount reported to DCJS on the quarterly claim.</p>	
<p>10. If the grant has a required match, is the sub-recipient using cash or in-kind funding? If in-kind, ask sub-recipient for supporting documents.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><input type="checkbox"/> If the sub-recipient is using cash match, the sub-recipient would be able to account for this in their accounting records and provide evidence of financial accountability. If in-kind match, documentation may include such things as a sign-in sheet that tracks volunteer hours, office space, and/or equipment space donated. Evidence of compliance of matching funds must be obtained and documented. If the sub-recipient accepted a match waiver, documentation of the approved waiver must be onsite.</p>	

Financial Review Notes:



Section IV. Programmatic Review

Programmatic monitoring includes reviewing the content and substance of the grant program. It also involves a qualitative and quantitative review to determine whether grant activities are consistent with the grant implementation plan and the grant goals and objectives stated in the original application. Programmatic monitoring also involves assessing technical assistance (TA) needs and assessing the implementation of projects and/or suggesting any necessary modifications.

In general, sub-recipients should be able to provide documentation for performance measures reported and for grant funded activities conducted, such as training offered or groups held, that support the program’s goals and objectives. In such instances, a log of attendees and date/location of training or group should be obtained. On occasion, grants may contain a special condition/encumbrance requiring that the sub-recipient fulfill a requirement, such as attending training. In such cases, sub-recipients should also provide documentation that the requirement was fulfilled.

Administrative Review/File Review	YES	NO	TA Provided	N/A	Documentation/Procedures to Review, if applicable	Issues Found and Documentation Collected/ Supporting Notes
11. Is the project site where one or more activities/deliverables are being performed? If no, note where activities are being performed.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Briefly document all locations where services and grant funded activities take place (do not include confidential/un-disclosed addresses for shelters).	
12. Can the sub-recipient identify the performance measures they are required to collect? Is the sub-recipient consistently reporting in	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	This information can be determined after interviews with grant funded staff or persons responsible for managing the award. If the sub-recipient responds no, document the steps taken to increase their awareness of the approved performance measures and reporting requirements to include technical assistance offered by DCJS.	



accordance with the grant requirements?						
13. As a result of your observations or discussions with the sub-recipient, are you able to validate that project goals and objectives (activities) are being implemented as planned? Has the sub-recipient reported progress with the established goals and objectives? Please note delays in implementation and reasons cited by the sub-recipient.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Verify that the grant-funded staff understand the goals and objectives of their funding stream(s). If the project is not being implemented as planned, describe the reasons why and explain if the sub-recipient advised DCJS of the delays in implementation. If the sub-recipient reported issues or barriers to achieving established goals and objectives, document the steps the sub-recipient has taken to address the challenges or explain the technical assistance provided by DCJS to mitigate these issues.	
14. Did you observe or were you made aware of changes in the grant project (i.e. changes in grant funded staff, authorized officials, budget modifications, project scope, address)? If so, were these changes allowable? Did the sub-recipient follow procedures to request the change?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All sub-recipients are required to report changes in grant funded staff or authorized officials within 30 days of the change. No amendments to the budget can be made without prior approval from DCJS. Further, changes in project activities or project scope must be approved by DCJS. If the sub-recipient did not adhere to the requirement, document technical assistance provided by DCJS to ensure compliance.	
15. Can the sub-recipient explain how their performance measurement data is collected? What type of data is collected, who provides the data, who collects it and how often,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Verify that the sub-recipient has an adequate method for collecting performance measurement data. Adequacy can be assessed by ensuring that consistent procedures are used, whether they are based on a proven model, and whether safeguards are in place to protect performance data integrity (i.e. internal validation of reports prior to submission to DCJS). For each service/activity described in submitted progress reports, the sub-recipient must provide evidence that	



<p>and where is it stored? (In other words, what is the sub-recipient's system for collecting and reporting data?) Can you verify that the reported performance data is valid and is being collected properly?</p>				<p>supports the information reported. Evidence of compliance can include redacted client worksheets, case management reports and/or statistical reports. Select a sample reporting period within the scope of the compliance monitoring review. Cross-reference the DCJS status report with the sub-recipient's internal performance data (i.e. VAdat reports, reports from other case management systems) to ensure that the data aligns with the information reported to DCJS. Obtain a copy of the performance data used to validate reported grant funded activities.</p>	
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Programmatic Review Notes:

Section V. Promising Practices

Briefly describe any innovative programs, initiatives or activities considered to be successful models for others to follow. Include any documentation if so desired.

Section VI. Federal Civil Rights Compliance Checklist (Federal Grants Only)

Complete the below checklist for federal grant programs.



Federal Civil Rights Review	YES	NO	TA Provided	N/A	Documentation/Procedures to Review, if applicable	Issues Found and Documentation Collected/ Supporting Notes
<p>16. If the sub-recipient is required to prepare an Equal Employment Opportunity Plan (EEOP) in accordance with 28 C.F.R. pt. 42, subpt. E, does the sub-recipient have an EEOP on file for review? (If a sub-recipient is unsure as to whether they are required to prepare an EEOP, they can find out at https://ojp.gov/about/ocr/eeop.htm, where they can also prepare and file their EEOP electronically).</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>If yes, on what date did the sub-recipient complete the EEOP? Provide the name, title, and date that the person responsible submitted this information to the Office of Civil Rights.</p>	
<p>17. If the sub-recipient is required to submit an EEOP Utilization Report to the Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) in accordance with 28 C.F.R. pt. 42, subpt. E, has the sub-recipient done so?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>If yes, on what date did the sub-recipient submit the EEOP Utilization Report? Provide the name, title, and date that the person responsible submitted this information to the Office of Civil Rights.</p>	
<p>18. Has the sub-recipient submitted a Certification Form to the OCR certifying compliance with the EEOP requirements?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>If yes, on what date did the sub-recipient submit the Certification Form? Provide the name, title, and date that the person responsible submitted this information to the Office of Civil Rights.</p>	
<p>19. How does the sub-recipient notify program participants and beneficiaries (e.g., through brochures, postings, or policy statements) that it does not</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Describe the process in which the sub-recipient notifies program participants and obtain any necessary supporting documentation verifying compliance with this award condition. Obtain a copy of any applicable policies or procedures.</p>	



discriminate in the delivery of services or benefits based on race, color, national origin, religion, sex, disability, and age (as well as sexual orientation and gender identity if the sub-recipient receives funding from the Office on Violence Against Women (OVW) or under the Violence Against Women Act (VAWA) of 1994, as amended)?						
20.How does the sub-recipient notify employees and prospective employees (e.g., through advertisements, recruitment materials, postings, dissemination of orders or policies) that it does not discriminate on the basis of race, color, national origin, religion, sex, and disability (as well as sexual orientation and gender identity if the sub-recipient receives funding from OVW or under VAWA)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Describe the process in which the sub-recipient notifies employees and prospective employees and obtain any necessary supporting documentation verifying compliance with this award condition. Obtain a copy of any applicable policies or procedures.	
21.Does the sub-recipient have written policies or procedures for notifying employees on how to file complaints alleging discrimination by the sub-recipient?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If yes, obtain a copy of the policies and procedures. If no, document efforts taken to adhere to the award condition.	
22.Does the sub-recipient have written policies or procedures for notifying program participants and beneficiaries on how to file complaints alleging discrimination by the sub-recipient, including how to file complaints with the Virginia Department of Criminal	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If yes, obtain a copy of the policies and procedures. If no, document efforts taken to adhere to the award condition.	



Justice Services (DCJS) and the OCR?						
23.If the sub-recipient has fifty (50) or more employees and receives DOJ funding of \$25,000 or more, has the sub-recipient taken the following actions:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>a. Adopted grievance procedures that incorporate due process standards and provide for the prompt and equitable resolution of complaints alleging a violation of the DOJ regulations implementing Section 504 of the Rehabilitation Act of 1973, found at 28 C.F.R. pt. 42, subpt. G, which prohibit discrimination on the basis of disability in employment practices and the delivery of services? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>b. Designated a person to coordinate compliance with the prohibitions against disability discrimination contained in 28 C.F.R. pt. 42, subpt. G? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>c. Notified program participants, beneficiaries, employees, applicants, and others that the subrecipient does not discriminate on the basis of disability? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
24.If the sub-recipient operates an educational program or activity, has the sub-recipient taken the following actions:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>a. Adopted grievance procedures that provide for the prompt and equitable resolution of complaints alleging a violation of the DOJ regulations implementing Title IX of the Education Amendments of 1972, found at 28 C.F.R. pt. 54, which prohibit discrimination on the basis of sex? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>b. Designated a person to coordinate compliance with the prohibitions against sex discrimination contained in 28 C.F.R. pt. 54? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	



					<p>c. Notified applicants for admission and employment, employees, students, parents, and others that the sub-recipient does not discriminate on the basis of sex in its educational programs or activities? <input type="checkbox"/> Yes <input type="checkbox"/> NO</p>	
25. Has the sub-recipient complied with the requirement to submit to the OCR any adverse findings of discrimination against the sub-recipient based on race, color, national origin, religion or sex that are the result of a due process hearing conducted by a federal or state court or a federal or state administrative agency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If yes, ask the sub-recipient to provide supporting documentation of adverse findings submitted to OCR.	
26. What steps has the sub-recipient taken to provide meaningful access to its programs and activities to persons who have Limited English proficiency (LEP)? Note: Meaningful access is defined as language access that results in timely, and effective communication at no cost to the LEP individual that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individual.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Briefly explain the steps taken to provide meaningful access and obtain a copy of the policy/procedure.	
27. Does the sub-recipient have a written language-access policy on providing services to LEP persons?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Obtain a copy of the policy or document steps the sub-recipient is taking to adhere to the award condition.	



28. Does the sub-recipient conduct any training for authorized officials and grant funded staff on the requirements of applicable federal civil rights laws?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The sub-recipient agrees to meet the Civil Rights training requirements through viewing the online training modules offered through the Office on Civil Rights at https://ojp.gov/about/ocr/assistance.htm. The sub-recipient (all authorized officials) must review these training modules at least once per grant cycle and must view the civil rights overview, standard assurances modules, and the module on the obligations to provide services to limited English proficient (LEP) individuals.</p> <p>Obtain a copy of records that verify compliance with this requirement or document steps the sub-recipient is taking to adhere to the award condition.</p>	
29. Does the sub-recipient provide federally funded services to eligible beneficiaries regardless of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>If the sub-recipient engages in explicitly religious activities, does it do the following:</p> <p>a. Separate the explicitly religious activities in either time or location from the federally funded activities? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>b. Ensure that participation in the explicitly religious activities is voluntary for participants in the federally funded program? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
30. If the sub-recipient receives funding under VAWA or from OVW, does it serve male victims of domestic violence, dating violence, sexual assault, and stalking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Comments:	
31. If the sub-recipient receives funding under VAWA or from OVW, does the sub-recipient	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If yes, describe how the services are sex-segregated or sex-specific and explain if the sub-recipient has determined that providing services that are sex-	



<p>provide sex-segregated or sex-specific services? Note: Programming is “sex-segregated” when males and females receive services in separate settings. Programming is “sex-specific” when a recipient designs it differently for males and females. Both “sex-segregated” and “sex-specific” programming places individuals in a position to “choose” to identify with a particular sex. Emergency shelter for domestic violence victims is an example of a service that victim service providers historically have segregated by sex. An example of sex-specific programming is the bystander intervention component of some educational programs on college campuses. Often, these campus educational programs teach different violence prevention skills to male and female students.</p>					<p>segregated or sex specific is necessary to the essential operation of the program and obtain any relevant policies or procedures.</p> <p>Comments:</p>	
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Section VII. Special Conditions Compliance

Complete the below checklist for compliance with applicable award conditions.

32. Does sub-recipient ensure that, as part of the hiring process for	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As part of the recordkeeping for the award (including pursuant to the Part 200 Uniform Requirements),	
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<p>any position within the United States that is or will be funded (in whole or in part) with award funds, the recipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1) and (2)?</p>					<p>maintain records of all employment eligibility verifications pertinent to compliance with this award condition in accordance with Form I-9 record retention requirements, as well as records of all pertinent notifications and trainings.</p> <p>Obtain a copy of the policy or document steps the sub-recipient is taking to adhere to the award condition.</p>	
<p>33. Does the sub-recipient have written procedures in place to respond in the event of an actual or imminent "breach" of personally identifiable information or PII?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The sub-recipient's breach procedures must include a requirement to report actual or imminent breach of PII to DCJS no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach. Note: Sub-recipients might have policies that prevent the breach procedures from being disseminated to the public for security purposes. In the event that the policy cannot be obtained, document the sub-recipient's procedures in the space provided.</p> <p>Obtain a copy of the policy or document steps the sub-recipient is taking to adhere to the award condition.</p>	
<p>34. Does the sub-recipient make determinations of suitability before certain individuals may interact with participating minors?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Determination of suitability required, in advance, for certain individuals who may interact with participating minors), and are incorporated by reference here. The details of this requirement are posted on the OJP web site at https://ojp.gov/funding/Explore/Interact-Minors.htm. A sample policy can be viewed here.</p> <p>Does the sub-recipient have written policies and procedures for determining suitability to work with minors? Obtain a copy of the policy and compare with award conditions.</p> <p>If a fingerprint-based search of criminal history registries is not legally available, has the subrecipient documented the legal prohibition?</p>	

				<p>Do the subrecipient’s policies or procedures describe how it determines which individuals are covered individuals consistent with the definition of “covered individual” in the subaward condition? If the subrecipient does not have written polices or procedures, ask the subrecipient to describe its practice for determining which individuals are covered consistent with the definition in the subaward condition.</p> <p>Ask the subrecipient to provide a list of its covered individuals. Select 5 or 5 percent of all covered individuals, whichever is greater, and request to see their written determinations of suitability. Add rows as needed. Do not request documents that include personally identifiable information beyond the name of the covered individual and his/her position/role. The subrecipient should redact any other personally identifiable information or sensitive information prior to providing the written determinations of suitability for review.</p> <p>Were selected determinations made within 6 months of the required searches, and renewed every 5 years, if applicable? Has the subrecipient re-examined determinations upon learning of information that reasonably may suggest unsuitability?</p> <p>Did the subrecipient pass the subaward condition to its subrecipient(s) and monitor the condition?</p> <p>Note: Grant monitors can reference Suitability Determination Checklist here: https://ovc.ojp.gov/sample-suitability-determination-for-subrecipient-monitoring-checklist.pdf</p>	
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35. Does the sub-recipient have a written conflict of interest policy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The sub-recipient certifies that it will disclose in writing any potential conflict of interest to DCJS in accordance with applicable federal awarding agency policy as required in 2 C.F.R. Part 200, Subpart E § 200.112.</p> <p>Obtain a copy of the policy or document steps the sub-recipient is taking to adhere to the award condition.</p>	
36. OVW Award Condition: Does the sub-recipient have a policy for response to workplace-related incidents of sexual misconduct, domestic violence, and dating violence?					<p>This policy is specific for sub-recipients that receive SASP funding. The recipient, and any subrecipient at any tier, must have a policy, or issue a policy within 270 days of the award date, to address workplace-related incidents of sexual misconduct, domestic violence, and dating violence involving an employee, volunteer, consultant, or contractor. The details of this requirement are posted on the OVW web site at https://www.justice.gov/ovw/award-conditions. The following link provides a model policy that was developed by Workplacesrespond.org specific to this OVW special condition: https://www.workplacesrespond.org/resource-library/model-guidelines/</p> <p>Obtain a copy of the policy or document steps the sub-recipient is taking to adhere to the award condition.</p>	
37. VAWA Award Condition: Does the sub-recipient provide legal assistance services?					<p>This condition is specific for sub-recipients that receive VAWA funding for VSTOP projects. The requirements are as follows: Any person providing legal assistance through a program funded under this grant program (1)any person providing legal assistance through a program funded under this section— (A)(i)is a licensed attorney or is working under the direct supervision of a licensed attorney; (ii)in immigration proceedings, is a Board of Immigration Appeals accredited representative; (iii)in Veterans’ Administration claims, is an accredited representative; or (iv) is any person who functions as an attorney or lay advocate in Tribal court</p>	



				<p>or (B) (i) is partnered with an entity or person that has demonstrated expertise described in subparagraph (A); and (ii) has completed or will complete training in connection with domestic violence, dating violence, stalking, or sexual assault and related legal issues, including training on evidence-based risk factors for domestic and dating violence homicide; (2) any training program conducted in satisfaction of the requirement of paragraph (1) has been or will be developed with input from and in collaboration with a state, local, territorial, or tribal domestic violence, dating violence, sexual assault, or stalking victim service provider or coalition, as well as appropriate state, local, territorial, and tribal law enforcement officials; (3) any person or organization providing legal assistance through this grant program has informed and will continue to inform state, local, territorial, or tribal domestic violence, dating violence, stalking, or sexual assault programs and coalitions, as well as appropriate state and local law enforcement officials of their work; and (4) the recipient's organizational policies do not require mediation or counseling involving offenders and victims physically together, in cases where sexual assault, dating violence, domestic violence, or child sexual abuse is an issue. The recipient also agrees to ensure that any subrecipient (“subgrantee”) at any tier will comply with this condition.</p>	
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Final Recommendation(s):



