

**Missouri Department of Department of  
Social Services, Division of Finance and  
Administrative Services, VOCA Unit**



***VOCA Program Standards and  
Guidelines for Subrecipient Agencies***

## ***About the VOCA Unit***

The Victims of Crime Act (VOCA) Unit serves as the State Administering Agency for VOCA funds from the Department of Justice (DOJ), Office of Justice Programs (OJP), Office for Victims of Crime (OVC). The VOCA unit provides pass through funding, training, and consultation to help subrecipient agencies develop programs to serve crime victims. The VOCA Unit also provides guidance and technical assistance to funded subrecipient agencies which are local and state governments as well as not-for-profit agencies on practices and policies that impact the VOCA grant program and the provision of services to crime victims.

## ***About the Program Standards and Guidelines***

These Program Standards and Guidelines were developed as a guide to assist Missouri crime victim service agencies and providers with the development and sustainability of crime victim service programs throughout the state. This guide is meant to serve as a tool in effort to implement and employ the provision of best practices. Furthermore, the purpose of this document is to provide agencies that serve victims, such as, prosecuting attorney offices, law enforcement agencies, child advocacy centers, courts, as well as agencies that serve a specific or general population of victims, with principles that are attainable and crucial for providing services to victims of crime.

***Please Note:*** For grant related purposes, if the subrecipient agency's mission is to primarily serve victims of domestic and/or sexual violence, the subrecipient agency will be required to continue to be in compliance with the MCADSV Service Standards and Guidelines and therefore is not required to comply with the VOCA Program Standards and Guidelines. ***However, ALL sub-grantees will be required to adhere to the Missouri Department of Social Services Code of Professional Ethics for Subrecipient Agencies and Individual Service.***

## ***Subrecipient Agency Structure Guidelines***

### ***Subrecipient agencies shall:***

1. Have a statement of purpose or mission statement that directly relates to victim services.
2. Have procedures which govern agency operations in accordance with applicable government laws and regulations.
3. Have organizational administration policies and procedures for the entire agency or institution.
4. Written guidelines specifically describing the policy on nondiscrimination and on the procedures for assessing and maintaining equal access to service for victims of crime.
  - a) Programs must comply with the non-discrimination requirements of the Omnibus Crime Control and Safe Streets Act of 1968, as amended, 42 USC 3789 (d), or the Victims of

Crime Act (as applicable) which prohibits discrimination in federally funded programs on the basis of race, color, national origin, religion or sex; Title VI of the Civil Rights Act of 1964, as amended which prohibits discrimination on the basis of race, color, or nation of origin (includes limited English proficiency – LEP) in federally funded programs; Section 504 of the Rehabilitation Act of 1973, as amended which prohibits discrimination in federally funded programs on the basis of disability; Subtitle A, Title II of the Americans with Disability Act (ADA (1990) which prohibits discrimination on the basis of disability; Title IX of the Education Amendments of 1972 which prohibits discrimination in federally funded programs on the basis of sex; the Age Discrimination Act of 1975 which prohibits discrimination in federally funded programs on the basis of age; Department of Justice Non-Discrimination Regulation, 28 CFR part 42, Subparts C, D, E, and G; and Department of Justice regulations on disability discrimination 28 CFR part 34 and Part 39.

- b) If any federal or state court or federal or state administrative agency makes a finding of discrimination after a due process hearing on the grounds of race, color, religion, national origin (including limited English proficiency), age, disability or sex against a recipient of federal funds, the recipient will forward a copy of the finding to the Office of Civil Rights (OCR) of the Office of Justice Programs, U.S. Department of Justice.

5. Review program policies and procedures regularly.
6. If a non-profit entity, be governed by a board of directors or guided by an advisory board, must have bylaws and maintain compliance with local, state and federal laws/regulations. \
7. Have written procedures for the review/revision of bylaws.
8. Comply with the Federal Fair Labor Standards Act.
9. Have written policies and procedures for data collection in compliance with grants/contracts, federal and state law.
10. Have standard operating procedures that are in compliance with fiscal and audit requirements, maintenance of appropriate insurance policies, and maintenance of a bookkeeping system.
11. Have written guidelines that describe a plan for regular program evaluation, including:
  - a) Collecting aggregate data on victims served and services rendered;
  - b) Performance-based assessments of staff service delivery;
  - c) Measures of victim satisfaction with services (victims must have the option of anonymity);
  - d) Periodic assessment of community service needs; and/or
  - e) Outcome-based assessment of victim services used
12. Communicate and collaborate with other service providers. This may be in the form of:
  - a) Policies;
  - b) Memorandums of agreement and/or interagency contracts/agreements;
  - c) Protocols; and
  - d) Cross-training

## *Personnel Administration*

### *Subrecipient Agencies shall:*

1. Have written personnel policies and procedures developed, adopted, and maintained by the program in accordance with state and federal requirements. The personnel policies shall include but are not limited to:
  - a) Unbecoming conduct;
  - b) Use of alcohol and/or other drugs;
  - c) Acceptance of gratuities, bribes or rewards;
  - d) Abuse of authority;
  - e) Proper care and maintenance of equipment;
  - f) Ethical behavior of the staff of the program;
  - g) Orientation and staff development;
  - h) Problem solving procedures;
  - i) Evaluation for performance and conduct;
  - j) Sexual harassment;
  - k) Confidentiality related to crime victim's records;
  - l) Response to impact of vicarious trauma upon service providers; and
  - m) Response to employees and volunteers who are victims of crime.
2. Have written personnel policies that comply with employment law and prohibit discrimination on the basis of race, color, religion, sex, ethnicity, national origin, age, economic status, social status, marital status, sexual orientation, gender, gender identity or ability.
3. Have written job descriptions for all staff (paid and volunteer), including criteria for training/experience (when applicable) as well as an organizational chart.
4. Have written policies regarding employee benefits, considerations for advancement and salary increases.
5. Have written policies for performance evaluations for both paid staff and volunteers
6. Have written policies and procedures for staff and volunteer disciplinary action and/or termination of staff and volunteers.
7. Have written policies and procedures for grievances filed by staff and volunteers (if applicable).
8. Have written policies for supervision of staff, including, as applicable:
  - a) Chain of supervision;
  - b) Required hours to be worked; and
  - c) Varying levels of supervision depending on work experience, training, and position in the program.
9. Have written policy that prohibits sexual and other forms of unlawful harassment in the workplace and provides a means by which harassment can be reported, including how it

can be reported if the perpetrator of the harassment is a supervisor.

10. Have all subrecipient agency policies explained and given to each employee with a signed and dated acknowledgement of receipt.
11. Adhere to the Missouri Department of Social Services Code of Professional Ethics for Subrecipient Agencies and Individual Service Providers.
12. Maintain a confidential file for each staff and volunteer that shall include, but not be limited to, application, resume, background check with the Children's Division of the Department of Social Services, criminal background check, licensures and certifications if applicable, reference checks, a signed confidentiality statement and a record of all trainings completed by the individual.

## **Staff Development**

### ***Subrecipient Agencies shall:***

1. Have training requirements for program staff providing direct services (paid and volunteer), including but not limited to:
  - a) A minimum of 20 hours of training for new staff, documented within the first calendar year of service in the program,
  - b) A minimum of 6 hours of ongoing professional development/continuing education each calendar year of service; and
  - c) Criteria for documenting completion of training requirements.
  - d) Training and ongoing professional development/continuing education topics may include:
    - An overview of the community's victim service programs;
    - Crime victims' rights;
    - History of victims' movements;
    - Theories of victimization;
    - Mental, physical, financial, social, emotional and spiritual concerns of victims;
    - Crisis intervention; intermediate and long-term services;
    - Victim trauma, grief and loss;
    - Crime and justice systems;
    - Victims' state and federal rights;
    - Prosecution;
    - Probation and parole;
    - Law enforcement response;
    - Advocacy;
    - Civil and criminal law;
    - Coordinated community response;
    - Victim expectations and involvement in justice;
    - Compensation, restitution, and civil preparations;
    - Ethics;
    - Documentation;
    - Confidentiality;
    - Diversity and values;
    - Personal Safety;

- Communication and conflict management;
  - Criminal offenses including but not limited to: property crime; identity theft; robbery; burglary; theft; assault; domestic violence; sexual offenses; stalking; human trafficking; drunk- driving death and injury; homicide/suicide; offenses related to children;
  - Victim notification;
  - Death notification;
  - Child victims;
  - Working with the media;
  - Burnout, compassion fatigue, vicarious trauma, secondary victimization;
  - Case management;
  - Interagency roles and referral;
  - Prevention, outreach and social change advocacy; and
  - Supervised internship.
2. Have written policies for volunteer management, including:
- a) The program’s philosophy on volunteer participation;
  - b) Recruitment, screening, dismissal and/or placement;
  - c) Job descriptions;
  - d) Training and supervision;
  - e) A system of recognition and reward;
  - f) Recordkeeping on volunteer participation; and
  - g) Evaluation of the volunteer program and volunteers.

## **Service Provision**

### ***Subrecipient agencies shall:***

1. Have a general list of individual victim services provided by the program. General program services may include but are not limited to (if applicable):
  - a) General information on victimization and victims’ rights;
  - b) Safety planning;
  - c) Crisis Intervention;
  - d) Case management;
  - e) Support groups;
  - f) Counseling/Therapy;
  - g) Education;
  - h) Information on prevention and risk reduction;
  - i) Advocacy or support on behalf of crime victims;
  - j) Assistance with victim compensation applications and/or restitution;
  - k) Intervention and advocacy with creditors, landlords, and employers;
  - l) Intervention with medical and mental health providers;
  - m) Assistance with transportation to services;
  - n) Assistance with protective relocation or shelter;
  - o) Assistance with referral for crime scene cleanup;
  - p) Assistance with identification and transportation of body and with funeral arrangements;
  - q) Information on administrative or justice- related case proceedings;
  - r) Referrals to mental health services, substance abuse services, social services, and legal

- services;
  - s) Assistance with document replacement; and
  - t) Assistance with arrangement for property repair.
2. Have written procedures for:
    - a) Providing information on criminal and civil proceedings;
    - b) Addressing victim crisis situations;
    - c) Addressing imminent danger, stalking and intimidation of victims/witnesses; and
    - d) Providing informed consent.
  3. Have written information to be provided to the victim on initial contact and throughout the service process. Information should include but is not limited to:
    - a) Victim rights;
    - b) Crime Victims' Compensation;
    - c) Confidentiality policies and procedures;
    - d) Services;
    - e) Subsequent steps of case processing and handling;
    - f) The case number and contact person;
    - g) Contacts for future crisis or emergency;
    - h) What to do if threatened or intimidated; and
    - i) Safety planning
  4. Have written procedures for documenting service provision, including:
    - a) Dates and time of service provision;
    - b) Staff member providing service;
    - c) Individuals to whom services were provided;
    - d) Types of services or referral provided;
    - e) Content of interaction;
    - f) Provisions for future or ongoing service; and
    - g) Policies and procedures to ensure that all services provided are documented in written form and that those records are maintained in a manner that protects the confidentiality and privacy rights of individuals, groups and/or families receiving services.

## **Program Accessibility**

### ***Subrecipient agencies shall:***

1. Not deny service on the basis of race, ethnicity, color, national origin, residency, language, sex, gender, gender identity, age, sexual orientation, ability, social class, economic status, immigration status, education, marital status, religious beliefs or HIV status.
2. Have sufficient training, supervision, materials, and outreach to provide competent service delivery based on characteristics of the victims. This includes—as appropriate to program goals—services for males and female victims as well as for children, the elderly, ethnic minorities, gay/lesbian/bisexual and transgender persons, people with disabilities, and others

with special needs (e.g., non-English speaking, homeless, etc.)

3. Refer individuals seeking to other programs when specific services are not available to be provided to that person.
4. Have written procedures on how advocates will respond to non-English speaking and Limited English Proficiency (LEP) persons.
  - a) In accordance with Department of Justice Guidance pertaining to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000(d), recipients of Federal financial assistance must take reasonable steps to provide meaningful access to their programs and activities for persons with limited English proficiency (LEP). “Meaningful access” will generally involve some combination of oral interpretation services and written translation of vital documents.
5. Provide auxiliary aids and services for persons with vision, hearing or speaking impairments (e.g. sign language interpreters, brailled texts, TDD, augmented phones or written information) at no cost to the victim to ensure that communications with persons with disabilities are as effective as communications with others.
  - a) Programs should require signed confidentiality agreements with all who provide interpretation, signing, Braille or taped materials.
6. Have written documentation of procedures for assessing safety, security, and maintenance of service premises. Components to be addressed include, as applicable:
  - a) Maintenance of physical premises;
  - b) Safety and security of grounds and interior for those served and staff;
  - c) Safety of transportation (if any) provided by staff to those served; and
  - d) Safety and security of phone, mail and electronic communications with those served.

## **Records and Confidentiality of Victim Information**

### ***Subrecipient agencies shall:***

1. Have written procedures for storing and maintaining records, including:
  - a) Types of records to be maintained;
  - b) Time limits for storage of records;
  - c) Destroying records; and
  - d) Written and electronic records of services must be maintained in a secure, locked storage area that is accessible only by paid staff members employed to provide direct services, authorized volunteers, administrative personnel directly responsible for billing for services provided, and administrative or executive staff members responsible for supervision and/or internal review of service records for quality-assurance purposes.
2. Have a written procedure for maintaining confidentiality of records, including:
  - a) Clearly defined terms/limits of confidentiality;
  - b) Disclosure of these terms to those served and to paid and unpaid staff;
  - c) Confidentiality agreement forms between those served and providers (if applicable);



- d) Confidentiality agreements between staff and the program;
  - e) Release of information policies and procedures; and
  - f) As applicable, policies/forms on confidentiality of interagency communications.
3. Have written procedures to ensure compliance with applicable provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA), as amended by the Health Information Technology for Economic and Clinical Health Act (HITECH) (PL-111-5) (collectively, and hereinafter, HIPAA) and all regulations promulgated pursuant to authority granted therein.
  4. Have written policies and procedures for service recipients to lodge complaints and/or grievances.
  5. Have a written policy on providing service recipients access to their records.

# **Missouri Department of Social Services Code of Professional Ethics for Subrecipient Agencies and Individual Service Providers**

*Victims of crime and the Missouri Department of Social Services expect every Subrecipient Agency and Provider, paid or volunteer to act with integrity, to treat all victims and survivors of crime-their clients-with dignity and compassion, and to uphold principles of justice for accused and accuser alike.*

*For these purposes, a victim service provider is defined as any individual, paid or volunteer, who works directly or indirectly with victims and survivors of crime.*

*To these ends, this Code will govern the conduct of Missouri Victim Service Providers and the Subrecipient Agencies:*

- I. *With every victim*, the victim service provider shall:
  1. Recognize the interests of the victim as a primary responsibility;
  2. Foster maximum self-determination on behalf of the victim;
  3. Respond respectfully to each victim with personalized services;
  4. Respect and protect all applicable civil and legal rights of the victim including, but not limited to, Article I, Section 32 of the Missouri State Constitution and the Missouri Revised Statutes section, 595.209;
  5. Protect and maintain the victim's rights to privacy and confidentiality in accordance with state and federal law, funding requirements, professional licensing standards, and program policy;
  6. Refrain from behaviors that communicate:
    - a) victim blame;
    - b) suspicion regarding victims accounts of the crime;
    - c) condemnation for past behavior; or
    - d) other judgmental, anti-victim sentiment.
  7. Respond to the victim's stated needs without regard to personal convictions and within the rules of the victim service provider's host agency;
  8. Adhere to legal, ethical, and behavioral standards of conduct, avoiding impropriety and the appearance of impropriety, or engaging in any conduct that would adversely affect his or her ability to provide services;
  9. Assist victims in identifying and accessing resources, as needed; and
  10. Not discriminate against any victim or deny services to any victim based on the victim's race, ethnicity, color, national origin, language, sex, gender, gender identity, age, sexual orientation, social class, ability, economic status, education, marital status, immigration status, religion, substance abuse, health status or HIV status.
  
- II. *With colleagues, other professionals, and the public*, the victim service provider shall:
  1. Act in a way that promotes mutual respect, dignity, and improvement of service;

2. Communicate in an ethical and constructive manner;
3. Encourage proficiency and excellence in victim assistance among colleagues (paid and volunteer) and allied professionals;
4. Provide professional support, guidance, and assistance to victim service providers who are new to the field in order to promote consistent quality and professionalism in victim services;
5. Seek to ensure that volunteers in victim service programs have access to the training, supervision resources, and support required to enhance their efforts to assist clients; and
6. Not discriminate against any employee, colleague, or allied professional on the basis of race, ethnicity, color, national origin, language, sex, gender, gender identity, age, sexual orientation, social class, ability, economic status, education, marital status, religion, substance abuse, health status or HIV status.

III. *In her or his professional conduct*, the victim service provider shall:

1. Maintain high personal and professional standards and competence in the delivery of services;
2. Maintain a high level of skill in the delivery of services;
3. Continue to improve upon their skills and professional knowledge;
4. Maintain client confidentiality in accordance with state and federal law, funding requirements, professional licensing standards and program policy unless clear permission has been given or legal requirements permit the victim service provider to do otherwise;
5. Represent their organization's policies and procedures in accordance with federal and state law without imposing and/or stating one's personal views and biases;
6. Accurately represent his/her professional title, qualifications, and/or credentials;
7. Not use her or his official position to secure gifts, monetary rewards, or special privileges or advantages; and
8. Know and uphold the ethical standards and legal requirements of the profession which she or he is a member (when applicable).