



Victims of Crime Act (VOCA) Procedures Manual

2017 – 2019 CONTRACTS

DIVISION OF FINANCE AND ADMINISTRATIVE SERVICES

Contents

VOCA Unit Procedures Manual.....	3
Purpose.....	3
VOCA Unit Contact Information.....	3
Governing Documents.....	3
Contracts/DFAS Procurement.....	4
VOCA Unit Operations.....	5
Staff Roles and Responsibilities.....	5
Time Submission.....	6
Electronic Grant File.....	6
Availability.....	7
Correspondence and Communication.....	7
Processing Invoices.....	7
Contract Adjustments and Amendments.....	8
Performance Management and Reporting.....	9
Audit Collection.....	10
Training and Technical Assistance.....	10
Match Requirements.....	10
Volunteer Requirements.....	10
Grant Closeout and De-obligation.....	12
Monitoring.....	12
Risk Assessments.....	12
Financial and Programmatic Monitoring.....	13
Appendices.....	18

VICTIMS OF VIOLENCE UNIT VOCA GRANT PROCEDURES MANUAL

Purpose

The Victims of Crime Act (VOCA) authorizes the Office for Victims of Crime (OVC) to award State Administering Agencies (SAAs) an annual formula grant to provide financial assistance to eligible crime victim assistance programs. The Missouri Department of Social Services' (DSS) VOCA Unit (Unit) will use this manual as a guide while administering the VOCA grant to subrecipients, particularly where federal legislation, rules, and guidelines, are silent.

Victims of Violence Unit - VOCA Contact Information

Mailing Address	P.O. Box 1082 Jefferson City, MO 65102-1082
Physical Location	Broadway State Office Building 221 W. High St., 3 rd Floor Jefferson City, MO 65101
Unit Phone	(573) 751-5775
Fax	(573) 751-7598
Email	DFAS.VOCAUNIT@dss.mo.gov

Governing Documents

All VOCA activity is governed by one or more of the following, but is not limited to:

34 USC 20101 et. al.	https://dss.mo.gov/dfas/victims-of-crime-act/files/34-USC-Chapter-201.pdf
28 CFR part 94 (VOCA Rules)	https://www.govinfo.gov/content/pkg/CFR-2009-title28-vol2/pdf/CFR-2009-title28-vol2-part94.pdf
DOJ Financial Guide (December 2017)	https://www.justice.gov/ovw/file/1030311/download
2 CFR part 200 (December 2017)	https://www.govinfo.gov/app/details/CFR-2014-title2-vol1/CFR-2014-title2-vol1-part200

Department of Social Services Financial and Administrative Guide for Subrecipient Agencies	https://dss.mo.gov/dfas/victims-of-crime-act/files/DSS-Financial-Guide.pdf
Department of Social Services Code of Professional Ethics for Subrecipient Agencies and Individual Service Providers	https://dss.mo.gov/dfas/victims-of-crime-act/files/DSS-Code-of-Ethics.pdf
Department of Social Services Program Standards and Guidelines for Subrecipient Agencies	https://dss.mo.gov/dfas/victims-of-crime-act/files/DSS-Service-Standards.pdf
Department of Social Services Travel Guidelines for Subrecipient Agencies	https://dss.mo.gov/dfas/victims-of-crime-act/files/DSS-Travel.pdf
MCADSV Sexual or Domestic Violence Service Standards for Provider Agencies	http://www.mocadsv.org/FileStream.aspx?FileID=418 https://www.mocadsv.org/FileStream.aspx?FileID=417
All other applicable Federal and State laws, and regulations	

Contracts/DFAS Procurement

The Division of Finance and Administrative Services (DFAS) Procurement Unit is responsible for overseeing the competitive process for soliciting and awarding VOCA grants to other governmental and non-profit agencies. This includes the solicitation, evaluation of applications, determination of conflicts of interest, and award and appeals processes. The Victims of Violence Unit - VOCA assists DFAS Procurement with the following:

Developing the VOCA subrecipient solicitation and application
Developing subrecipient criteria, including priority areas and service standards
Scoring potential subrecipient applications
Developing contract conditions and special conditions
Developing programmatic requirements
Any other activities agreed upon by the DFAS Procurement Manager and the VOCA Unit Manager

Victims of Violence Unit - VOCA Operations

After contracts are awarded, the Victims of Violence Unit - VOCA is responsible for day-to-day grant management. VOCA Unit Program Development Specialists serve as the primary point of contact for subrecipients.

Staff Roles and Responsibilities

Victims of Violence Unit - VOCA Manager

The Victims of Violence Unit - VOCA Manager is responsible for maintaining and tracking the following:

- Federal VOCA Administrative expenditures: Up to five (5) percent of the total federal award amount
 - Travel, training, and other expenses: E&E or F designations in the state's system
 - Salaries and benefits: PS or (P) designations in the state's system
- State project expenditures: Up to 10 percent of the total federal award amount
- Discretionary Grant Tracking: Track all expenditures related to discretionary grants
- State Fiscal Year Spending Authority: Track all VOCA expenditures to ensure State Fiscal Year (SFY) spending authority is not exceeded
- Ensures all Federal reporting is completed and submitted
- Other management responsibilities outlined in the Manager Procedure Manual

Program Development Specialists

The Victims of Violence - VOCA Program Development Specialists manage the day-to-day tasks of assisting subrecipient agencies with programmatic and financial operations. Specific duties include:

- Researches, interprets and applies federal and state laws, rules, regulations and guidelines to applicable federal grant programs and situations that may arise
- Performs onsite programmatic monitoring
- Drafts and submits the onsite programmatic monitoring report to the subrecipient via email. The Management Analysis Specialist will be copied on this email.
- Provides technical assistance to subrecipients
- Process subrecipient invoices
- Enters subrecipient performance data into OVC's Performance Management Tool and ensures accuracy
- Day-to-day contact with subrecipients
- Provides grant training, technical assistance, etc.
- Evaluates potential subrecipient applications and makes funding recommendations
- Completes risk assessments for all applicants that are recommended to be awarded VOCA funding

Management Analysis Specialist

The DFAS Compliance Services Unit (CSU) will assist the Victims of Violence Unit - VOCA in completing subrecipient fiscal monitoring. Specifically, Management Analysis Specialists will perform the following duties:

- Implements the VOCA subrecipient risk-based monitoring plan of internal and contracted operations
- Provides desk and onsite fiscal monitoring by reviewing VOCA subrecipient accounting policies and procedures, accounting systems, invoice supporting documentation, and match
- Drafts and submits the desk and onsite fiscal monitoring report to the subrecipient via email. The Program Development Specialist will be copied on this email.
- Provides input, and assist when requested, to VOCA Unit Program Development Specialists when completing risk assessments

Time Submission

Victims of Violence Unit - VOCA Staff, including the Victims of Violence Unit - VOCA Manager and Program Development Specialists, who are 100 percent allocated to working on the VOCA grant do not submit timesheets.

Compliance Unit staff who work on VOCA-related projects must complete and submit a timesheet to the Compliance Unit Manager on the Monday following the pay period.

All other staff who are loaned to or are working on VOCA projects must complete the VOCA timesheet. The timesheet must be submitted to the Victims of Violence Unit - VOCA Manager on the Monday following the end of the pay period.

Electronic Grant File

The Victims of Violence Unit - VOCA drive houses all federal and subrecipient VOCA grant documents, agency correspondence, monitoring documents, and any other document related to the VOCA grant. At the beginning of each federal grant award period, the VOCA Unit Manager will create an electronic folder in the VOCA Unit drive for the new VOCA award. The folder will contain the following two subfolders: 1) Federal Award, and 2) Subrecipients. The Federal Award Subfolder will contain all documents and correspondence associated with the Federal award, such as DSS's application and grant award notice. The Subrecipient subfolder will house the Master Spreadsheet and subfolders for each of the subrecipients, including any special projects. Each subrecipient folder will contain documents pertaining to that agency's award, including, but not limited to award documents, invoices, and performance data. It is the Program Development Specialist's responsibility to create and maintain their subrecipient electronic folders.

Federal VOCA Award FFY19	
Subfolder	Subfolders/Documents
Federal Award	Award Documents
	Application
	Grant Award Notice
	Contract
	Grant Adjustment
	Change of Information Notices
	Correspondence with Federal Point of Contact
Subrecipients	Master Spreadsheet
	Subrecipient Folders
	Award Documents
	Invoices
	Performance Data
	Monitoring
	Correspondence

All financial monitoring files will be maintained on the Compliance Unit drive. A copy of the report will be emailed to Victim of Violence Unit - VOCA program staff to be retained in the VOCA subrecipient electronic grant file.

Naming Conventions

Each saved document will follow the same naming convention. The VOCA Unit Manager and Program Development Specialists will determine a standard naming convention.

Availability

Each Program Development Specialist will have assigned subrecipients for which they are responsible for day-to-day grant management tasks, including responding to subrecipient emails and phone calls within 24 hours. If the Program Development Specialist is out of the office or unavailable for more than four (4) hours, an email Out of Office notification and voicemail recording must be created to state when the Program Development Specialist will return and whom to contact should there be an immediate need.

Correspondence and Communication

Program Development Specialists must save all subrecipient email correspondence pertaining to the following: agency change of information and/or staffing structure, allowable costs, grant adjustment questions, and budget questions. All phone conversations must be summarized and logged into the Notes section in the subrecipients' individual workbooks.

If communication is inhibited due to a language barrier, Language Link may be used by calling 1-888-338-7394. DSS's account number is 26214. If interpreters are needed for live meetings, monitoring, video calls or other situations, coordinate with the DSS Office of Civil Rights and follow DSS policy regarding meaningful access to subrecipients and clients. The phone number for the DSS Office of Civil Rights is (573) 751-9090. Additional information regarding Limited English Proficiency (LEP) is located in the VOCA drive and in Appendix...

Grant Solicitation and Application

The solicitation, evaluation, determination of conflicts of interest, awards and appeals of contracts are the responsibility of the DFAS Procurement Unit. Competitive process(es) are available to non-profit and governmental services providers that assist crime victims. The Victims of Violence Unit - VOCA will assist DFAS Procurement with the following:

- RFP/Solicitation development
- Criteria development
- Scoring applications
- Identifying contract conditions/special conditions
- Outlining programmatic requirements
- Determining eligible activities
- Other activities agreed upon by the DFAS Procurement Unit Manager and the VOCA Unit Manager

The following awards will be made directly rather than through a competitive process at the discretion of the Department:

- Awards to state agencies
- Awards to entities in areas of crisis
- Awards to entities in instances in gaps in service
- Other special circumstances as defined in the agreement

Processing Invoices

Subrecipients can submit monthly invoices by either emailing their Program Development Specialist or mailing it to:

DSS/DFAS VOCA Unit
P.O. Box 1082
Jefferson City, MO 65102-1082

Program Development Specialists are responsible for processing subrecipients' invoices. To determine whether a subrecipient's expense may be reimbursed, the following four-pronged test must be used:

- **Allowable:** The expense must be allowable under all applicable rules, regulations, and guidelines.
- **Allocable:** The expense must be allocated to an approved grant category.
- **Reasonable:** The expense must be reasonable in accordance with the grant program’s purpose and financial accountability standards.
- **Necessary:** The expense must be necessary for the subrecipient to carry out the grant’s program and purpose.

If the Program Development Specialist determines the invoice is completed correctly, the expenses are reimbursable, and the second page of the invoice is complete, the Program Development Specialist must sign and date the invoice and complete a SAM II Request Form with the below information. A copy of the SAM II Request Form is attached as *Appendix B: SAM II Request Form*.

Division	DFAS
Unit/Office	VOCA
Contact Person	Program Development Specialist’s Name
Phone Number	Program Development Specialist’s Phone Number
Vendor Name	Name of Subrecipient
Amount of Payment	Invoice Amount
Contract, ER, or PG Number	ER130
Organization Code(s) to be Charged	4171

After the SAM II Request Form is completed, the Program Development Specialist will enter the following information into the subrecipient’s tab of the Master Spreadsheet:

- Invoice Date
- Invoice Number
- Amount invoiced in each budget category
- Match amount

In addition, the Program Development Specialist will enter the data provided on the second page of the invoice into the appropriate spreadsheet.

A copy of the invoice and SAM II Request Form must be saved in the subrecipient’s electronic file. Either the original invoice (if mailed) or a printed copy of an emailed invoice will be attached to the SAM II Request Form and sent to DFAS – Accounts Payable by inter-office mail. The address is:

DFAS – Accounts Payable
615 Howerton Ct.
Jefferson City, MO

Once Accounts Payment issues reimbursement, the Program Development Specialist must enter the EFT number and date into the subrecipient’s tab of the Master Spreadsheet.

Contract Adjustments and Amendments

Any adjustments between existing budget categories, shifts in programmatic functions, and adding or deleting budget categories requires a contract adjustment. When this occurs, the subrecipient must submit a Contract Amendment Request form. The Program Development Specialist will review the request to ensure that all adjustments are allowable, allocable, necessary, and reasonable. If so, the Program Development Specialist will forward the request to the VOCA Unit Manager for approval. A copy of the Contract Amendment Request form is located in *Appendix C: Contract Amendment Request Form*.

When a subrecipient seeks to adjust funds between categories for an amount exceeding 10 percent of the total contract, or the subrecipient wishes to add or delete budget categories, the subrecipient must submit a Contract Amendment Request form. In addition to being approved by the Program Development Specialist and Victims of Violence Unit - VOCA Manager, -the DFAS Procurement Unit must be notified of the change to edit the appropriate budgets.

Performance Management and Reporting

Progress/program reports are to be submitted throughout the course of the grant award to provide data regarding the subrecipient’s plan, program, or project. Program Development Specialists are responsible for ensuring that all required performance measures and reports are accurate and submitted into the OVC’s PMT. The following three reports are required: 1) Subgrant Award Report (SAR), 2) Subgrantee Performance Measures Report, and 3) Grantee Report.

The SAR must be completed within 90 days of the subaward start date. The Program Development Specialist will provide each subrecipient with the SAR form to be completed and submitted back to DSS. The Program Development Specialist must ensure all information in the SAR is correct. Once data has been deemed accurate, the Program Development Specialist will enter the subrecipient SAR data into the PMT. The SAR must be completed and submitted to OVC prior to invoicing. The subrecipient must notify their Program Development Specialist of any changes of SAR information. The Program Development Specialist must revise the SAR with any updates within 30 days of the change.

Subrecipients are also required to submit a quarterly Subgrantee Performance Measures Report form to their assigned Program Development Specialist within 30 days of the end of a quarter. Once the subrecipient has submitted the completed form, the Program Development Specialist will review the report’s accuracy and enter the data into the PMT. It is the Program Development Specialists’ responsibility to ensure the form sent to the subrecipients matches the OVC report.

The Grantee Report collects qualitative data from subrecipients regarding VOCA-funded Victim Assistance Programs. The Program Development Specialist must collect this annual report information from each subrecipient at the same time as the final Subgrantee Performance Measures Report and enter the information into the PMT.

After all subrecipients’ data is entered into the PMT, the Program Development Specialist must notify the Victims of Violence Unit - VOCA Manager. The Victims of Violence Unit - VOCA Manager will then review the reports to ensure all information is provided and submit the report to the OVC.

At least 30 days prior to each report’s due date, the Program Development Specialist will email subrecipients the form that is to be completed and a reminder notifying of when the forms are due. Program Development Specialists will follow the below reporting schedule.

FFY Quarter	Send Email to Subrecipients	Subrecipient Report Due to Program Development Specialist	Report Due in PMT
Q1 October 1- December 31	December 31 st	January 30 th	February 15 th
Q2 January 1 – March 31	March 31 st	April 30 th	May 15 th
Q3 April 1 – June 30	June 30 th	July 30 th	August 15 th
Q4 July 1 – September 30	September 30 th	October 30 th	November 15 th
Annual	September 30 th	October 30 th	November 15 th

October 1 – September 30			
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Audit Collection

Subrecipients that expend \$750,000 or more as a subrecipient of Federal funds in the organization’s fiscal year are required to have a single organization-wide audit conducted in accordance with Title 2 C.F.R. Subpart F.¹

The Compliance Unit is responsible for reviewing single audits and issuing a management decision for any audit findings that relate to VOCA awards. The management decision must be issued within six months of acceptance of the audit report by the FAC. The Compliance Unit will comply with 2 C.F.R. §200.521 regarding management decisions.

Training and Technical Assistance

All training and technical assistance materials, including recorded trainings, must be documented and saved in the Training/Technical Assistance folder in the Victims of Violence Unit - VOCA folder. All trainings conducted via Adobe Connect or any other web-based tool must be recorded.

Prior to the release of the VOCA solicitation, Victims of Violence Unit - VOCA staff may conduct in-person or web-based trainings to inform potential subrecipients of the VOCA application process, priority areas, and program requirements. These trainings may occur in St. Louis, Jefferson City, and Kansas City. The Victims of Violence Unit - VOCA Manager and/or Program Development Specialists may conduct additional trainings throughout the year regarding the following topics: monitoring, invoicing, and data collection/performance management.

All documents created for the trainings must be available to all subrecipients, either by posting the training materials on the DSS VOCA website or via email.

Match Requirements

The Federal VOCA award requires the recipient of the award to participate in the provision of victim's services by providing a match or cost sharing of the total Federal award. Matching or cost sharing means the portion of project costs not paid by Federal funds.² Match requirements are for VOCA Awards is 20% of the total project, where the Federal Award amount is considered 80% of the total project. Matching funds are restricted to the same use of funds as allowed for the Federal funds. If it is not allowable under the Federal award, it is not allowable as match.³

State Administering Agencies (SAA) may apply to the Director of the OVC to request a full or partial match waiver for specific subrecipients. Waiver requests must be supported by the SAA and justified in writing.⁴ MO DSS VOCA Unit would be the State Administering Agency.

The subrecipient is responsible to provide the match for the Federal award and should track match costs with appropriate supporting documentation. Subrecipients are responsible to report match on a monthly basis, as part of the invoicing process, to the VOCA Unit.

The following types of cost may be used to meet match requirements:

- Cash: the value of direct funding for the project
- Volunteered professional or personal services: the value should be consistent with the rate of compensation for similar services. If similar work is not performed, the rate should be consistent with the average rate found in the regional labor market.

¹ <https://www.justice.gov/ovw/file/1030311/download>

² Department of Justice (DOJ) Grants Financial Guide 2017

³ Department of Justice (DOJ) Grants Financial Guide 2017

⁴ Questions and Answers: Victims of Crime Act (VOCA) Victim Assistance Program Rule [Federal Register 7/08/2016]

- Materials/equipment: value should not exceed fair market value for item(s).
- Space and facilities: value should not exceed the fair rental value of comparable space and facilities in the region.
- Non-VOCA funded victim assistance activities: including, but not limited to, performing direct services, coordinating or supervising those services, training victim assistance providers, and advocating for victims.

The following provides guidance in determining the value of Volunteer time or space use:

- Match Volunteer Time:
 - Option 1: Use the hourly rate of pay for similar work paid to employees within your organization
 - Option 2: If option 1 is not available, use the Missouri hourly average salary of all production and non-supervisory workers on private non-farm payrolls based on yearly earnings provided by the Bureau of Labor Statistics for the most recent year available. Independent Sector provides this calculation on their website <https://www.independentsector.org/resource/the-value-of-volunteer-time/>. As of January 2017, the average hourly salary for Missouri was \$23.21 per hour.
- Match Space Use:
 - Option 1: Use the rate per square foot that would be charged to rent the space at market rate
 - Option 2: If option 1 is not available, use the average cost of office space in Missouri. See the following link for guidance on average value by region (average range \$17 to \$23 per square foot (from <https://offices.net/report-missouri.htm>)).

Volunteer Requirements

VOCA requires programs to use volunteers, to the extent required by the SAA, in order to be eligible to receive VOCA funds.⁵ SAA may allow subrecipients to use VOCA funds to train volunteers in how to provide services.

Volunteer on-call time should be treated in the same manner that a paid employee in a similar situation would be compensated. [See 28 CFR 94.118(f)] The SAA should follow the guidance under the Fair Labor Standards Act (FLSA) to determine the extent to which the duties of the on-call volunteer require that the volunteer can or cannot use his/her time effectively for his/her own purposes.⁶ If time cannot be use for own purposes the person is considered to be working while on-call. FLSA guidance should also be referred to about an agency's employee volunteering time to their employer which is a non-profit agency. Typically, such a practice would not be allowable under the FLSA.

Volunteer services must be documented and supported by the same methods used to track employee time spent on activities. The following should be part of the subrecipient's volunteer tracking log:

- Date of volunteer work
- Volunteer name (organization and person)
- Start time and ending time
- Hours by activity (example of activities include: shelter support, child care, life skills, client mentor, other/administrative duties)
- Total hours
- Name and signature verifying volunteer date, times and activities worked on
- Volunteer coordinator signature and date
- Volunteer signature and date

⁵ Questions and Answers: Victims of Crime Act (VOCA) Victim Assistance Program Rule [Federal Register 7/08/2016]

⁶ Questions and Answers: Victims of Crime Act (VOCA) Victim Assistance Program Rule [Federal Register 7/08/2016] (Match #8)

Grant Closeout and De-obligation

At the onset of an award, the subrecipient is responsible to track and monitor the use of and spending of the award. The subrecipient should track the initial award beginning balance, spending for the month, and remaining balance at month end. The subrecipient should notify the VOCA Unit, after close of the month, if spending of the award is significantly and materially over or under the expected monthly budget.

At the end of the contract period, the subrecipient has a 90-day liquidation period to expend any obligated funds and ensure matching funds are met. Any funds that have not been obligated by the end of the award period or liquidated within 90 days of the end of the contract period will be reverted to DSS.

The Program Development Specialist will perform the grant closeout process at the end of each grant or contract cycle. This includes ensuring the following have occurred:

1. All invoices have been submitted, approved and paid;
2. All reports have been submitted and approved; and
3. Match requirement has been met.

Once the above steps have been completed, the subrecipient will verify that each subrecipient's spreadsheet in the Master Spreadsheet is current. The Master Spreadsheet will indicate subrecipient de-obligated fund amounts as well as whether the Program Development Specialist recommends that the subrecipient grant file be closed. The Program Development Specialist should notify the Victims of Violence Unit - VOCA Manager when it is determined a subrecipient has de-obligated funds or the grant is ready to be closed.

Monitoring

Risk Assessments

The Victims of Violence Unit - VOCA Manager, with guidance from senior DSS management and the DFAS Compliance Service Unit, will oversee the subrecipient risk assessment process. Risk assessments examine the potential subrecipient agency's financial stability, management systems, history of performance, reports and findings from previous audits, and the ability to implement statutory, regulatory, or other requirements.⁷ The purpose of the risk assessment is to establish a monitoring program that meets the following objectives:

- Compliance with 2 C.F.R. 200, 28 C.F.R 94 and all other governing rules and regulations;
- Monitoring levels and frequency align with the assessed individual level of risk of each subrecipient agency; and,
- Conserve limited resources by designing a monitoring program that is fiscally responsible regarding the use of resources, personnel labor costs, and travel expense.

Each VOCA subrecipient's risk will be assessed after the VOCA grant has been awarded by the assigned Program Development Specialist. Each potential VOCA grant recipient's application and previous grant experience will be used to complete the risk assessment tool. Each potential subrecipient will be evaluated using the same criteria and scoring mechanism. Based on the information entered into the risk assessment tool, a score will automatically be calculated. The scores for each question automatically calculate the subrecipient's risk level. Factors that affect risk include:

Grant Award Amount

Rank of contract size (small, medium, or large)
based on the total Dollar Amount of Grant Award

⁷ https://www.ecfr.gov/cgi-bin/text-idx?SID=870db2718d81511f58f280c0fdc0957d&node=se2.1.200_1205&rgn=div8

Previous Grant Experience
Type of Financial and Compliance Monitoring that has been performed
Key Personnel Turnover and/or frequency of program staff turnover
Does agency have new or substantially changed systems?
Issues of Noncompliance in the current grant year or as identified in an audit
Financial Management Problems or Issues
Significant Findings of Questioned Costs
Recurring or Unresolved Issues
Programmatic Noncompliance

The following chart contains the type of frequency of programmatic and financial monitoring subrecipients will need based on risk level.

Monitoring Type	High Risk Score: ≥50	Moderate Risk Score: 26-49	Low Risk Score: ≤25
Onsite Monitoring	Annually	Bi-Annually	Bi-Annually
Desk Monitoring	Annually	Bi-Annually	Only to follow-up if CAP was implemented during onsite review. If no CAP, no desk monitoring.

A new program that has not previously been awarded VOCA or any other OJP funding will automatically be classified as high risk for the first year. At the end of the year, the subrecipient's risk level will be assessed again. Subsequent monitoring will be based on the new risk assessment score.

Financial and Programmatic Monitoring

The Victims of Violence Unit - VOCA has two types of monitoring: 1) desk monitoring, and 2) onsite monitoring. Based on the results of the subrecipient risk assessments, at the beginning of the contract period, each Program Development Specialist and Management Analysis Specialists will create monitoring schedules that include the type and frequency of monitoring that will occur for each subrecipient. Once created, the Program Development Specialist and Management Analysis Specialists will submit the proposed monitoring schedules to the Victims of Violence Unit - VOCA Manager and Compliance Services Audit Manager respectively for approval. The monitoring schedules for the VOCA Unit and Compliance Services Unit will be shared with the other unit in order to prevent being on-site at the same time if possible.

The information reviewed in each type of monitoring includes the following:

Review Tool Tab	Review Type	Information Reviewed
Financial Review Requirement	Onsite and Desk Fiscal Monitoring	This is a review of the subrecipient's financial policies and procedures regarding the accounting system and record management, salaries, wages, and fringe benefits, property standards, procurement and contractual requirements, travel, record retention and maintenance, match/cost sharing, program income, and conflict of interest.
Invoice Review	Onsite and Desk Fiscal Monitoring	This is a review of supporting documentation for each of the invoices submitted in the period under review. Both the amount invoiced and the amount the subrecipient's general ledger indicates was invoiced will be reviewed.
Match Review	Onsite and Desk Fiscal Monitoring	This includes a review of the subrecipient's supporting documentation for match amounts that were reported on each invoice.
Expense Transaction Testing	Onsite and Desk Fiscal Monitoring	This tab facilitates the review and testing of the expenses recorded for the VOCA program. To complete this tab, the Management Analysis Specialist will review supporting documentation and the approval process, re-calculate amounts, and verify the allowability of the expense.
Payroll Process Review	Onsite Fiscal Monitoring	This tab facilitates the testing of payroll processing in accordance with policy and procedure. To complete this review, the Management Analysis Specialist will request a payroll report and select a sample of employees to review payroll processing and time keeping detail in order to validate whether personnel costs were allocated to VOCA funds properly and policies and procedures were followed.
Bank Statement Reconciliation Review	Onsite Fiscal Monitoring	This tab facilitates the review and testing of the bank statement reconciliation process in accordance with policies and procedures.
Purchasing Review	Onsite Fiscal Monitoring	This tab facilitates the review and testing of the subrecipient's purchasing process. This entails reviewing supporting documentation for a sample of contracts paid by federal VOCA funds.
Property Asset Review	Onsite Fiscal Monitoring	This tab facilitates the review and testing of the subrecipient's purchasing and record keeping of furniture and property assets. This entails a review of a furniture and property asset list and last physical inventory count.
Interview	Onsite Programmatic Monitoring	The Program Development Specialist will meet with subrecipient executive staff to better understand the VOCA-funded program and agency operations.
Policies and Procedures Review	Onsite Programmatic Monitoring and Fiscal Desk Review	This tab requires a review of the subrecipient's policies and procedures as they pertain to the subrecipient agency structure, personnel administration, staff development, service provisions, program accessibility, and records and confidentiality of victim information.
Grant File Review	Onsite Programmatic Monitoring	This tab requires a review of the subrecipient's grant file as it pertains to the VOCA award. Information in the file should include the grant application, DSS correspondence, award

		documents, grant budget/budget adjustments, invoices, and performance reports.
Personnel Review	Onsite Programmatic Monitoring	Program Development Specialists will pull a sample of VOCA-funded personnel files to determine whether each file contains required documents, including but not limited to the employee's application, resume, background checks, licensures, certifications, and timesheets. In addition, the Program Development Specialist will review files to ensure staff have completed the proper training and continuing education.
Service Standard Verification	Onsite Programmatic Monitoring	The purpose of this tab is to determine whether the subrecipient maintains all required documentation for each service, including dates and times of service, staff members providing the service, individuals to whom the service is provided, service type, service content, provisions for future or ongoing interaction, and confidentiality.
Programmatic Performance	Onsite Programmatic Monitoring	The purpose of this tab is to ensure accuracy of performance data submitted with each invoice.
Data Validation and Reporting	Onsite Programmatic Monitoring	The purpose of this tab is to ensure the accuracy of the performance measure data that was provided in OVC's PMT.
CAP Review	Programmatic and Fiscal Desk Review	The purpose of this tab is to ensure subrecipients have implemented corrective action plans, if necessary.

The Program Development Specialist and Management Analysis Specialist will determine the depth of monitoring tasks using a non-statistical sampling method that results in reviewing a sufficient number of transactions or materials that can be expected to be representative of the area being reviewed; and likely to provide a reasonable basis for conclusions about the provider's compliance. The Program Development Specialist, Management Analysis Specialist, along with the Victims of Violence Unit - VOCA Manager and Compliance Unit Manager, will use professional judgement in determining sample size for testing. The determination of the sample size for a provider monitoring may vary from provider to provider based on certain risk factors and the desired level of assurance in determining the provider's contract compliance.

Desk Monitoring

Programmatic desk monitoring will be used to provide DSS with documentation supporting the programmatic performance data submitted on the invoices and performance measure data submitted in the PMT for the period under review. In addition, the programmatic desk monitoring will be used to review any updated policies and procedures and corrective action plans. The Program Development Specialist is responsible for scheduling the review, collecting the necessary documents to perform the review, and submitting the monitoring report.

Fiscal desk monitoring will be used to provide DSS with documentation supporting the expenses requested for reimbursement over a three-month period. Compliance Unit Management Analysis Specialists are responsible for performing each subrecipient's fiscal desk monitoring throughout the contract period, including scheduling the review, collecting the necessary documents to perform the review, and submitting the monitoring report.

To complete a desk review, the Program Development Specialist or Management Analysis Specialist will complete the following tasks.

Task	Instructions
Send subrecipient the Subrecipient Desk Review Prep Letter	If this is the subrecipient's first monitoring (either desk or onsite) of the contract period, request that the agency's financial policies and procedures are provided to be reviewed. If this is not the first monitoring of the contract period, request

	<p>that the subrecipient provide any policies and procedures that have been revised or created since the last desk or onsite fiscal monitoring.</p> <p>If a Programmatic onsite monitoring has already occurred during the contract period, request that the subrecipient provide any revised or newly created programmatic policies and procedures.</p>
Complete the Programmatic or Fiscal Monitoring Tool – Desk Review workbook.	<p>Complete each tab in the Fiscal Monitoring Tool – Desk Review workbook.</p> <p>If the subrecipient submitted programmatic policies and procedures that were revised following the last review, coordinate with the appropriate Victims of Violence Unit - VOCA Program Development Specialist to review the programmatic policies and procedures. If there are no new or revised programmatic policies and procedures, indicate this in the monitoring tool. A review of the policies and procedures does not have to be completed.</p> <p>If this is the subrecipient’s first fiscal monitoring (either desk or onsite) of the contract period, review all fiscal policies and procedures and complete the Financial Review Requirement tab. If this is not the first fiscal monitoring review, only review newly created or revised fiscal policies and procedures that have been submitted by the subrecipient.</p>
Draft the Programmatic or Fiscal Desk Monitoring Report	<p>Based on the findings during the review, complete the Fiscal Desk Monitoring Report. In the report, include a brief description of the subrecipient’s project, including where the office is located, the programs offered, types of victims served, etc. For each of the reviewed sections (policies and procedures, invoices, and match), state any findings. State any findings and necessary corrective actions in the Findings and Correction Actions section of the report.</p>
Send the subrecipient the appropriate letter and report.	<p>Once the Fiscal Desk Monitoring Report has been approved by the Compliance Manager, send either the Compliance Letter or Corrective Action Plan Letter and the report to the subrecipient.</p> <p>Provide the appropriate Program Development Specialist with a copy of the letter and report.</p>
Corrective Action Plan Follow-Up	<p>If a corrective action plan is needed, work with the subrecipient to ensure the actions are being completed. Notify the Program Development Specialist when all corrective actions have been completed.</p>

Onsite Programmatic and Fiscal Review

Onsite programmatic and fiscal reviews are required to occur at least once every two years to provide an in-depth examination of the subrecipient’s policies and procedures; as well as, to test VOCA expenditure accuracy and compliance. Program Development Specialists will conduct the programmatic review and Management Analysis Specialists from DFAS’s Compliance Services Unit will conduct the fiscal monitoring.

The Program Development Specialist and the Management Analysis Specialist will complete the following tasks for the onsite programmatic or fiscal review.

Task	Instructions
Email the Onsite Prep Letter and Questionnaire to the subrecipient.	Once the monitoring has been scheduled, send the subrecipient the prep letter and questionnaire for completion. Allow two (2) weeks for the completion of the Questionnaire.

	<p>The Questionnaire must be completed prior to the first onsite monitoring. The subrecipient does not need to complete the Questionnaire before all onsite reviews.</p>
Onsite Review Preparation	<p>Review the completed Questionnaire. If the subrecipient submitted programmatic or financial policies and procedures, begin to review and complete the Policies and Procedures tab in the Programmatic Monitoring Tool or the Financial Review Requirement of the Fiscal Monitoring Tool.</p>
Onsite Programmatic Review	<p>The Program Development Specialist will meet with the subrecipient's VOCA programmatic staff to complete the Interview tab of the Programmatic Monitoring Tool.</p> <p>While onsite, the Program Development Specialist will review the necessary documents to complete the monitoring tool.</p>
Onsite Fiscal Review	<p>The Management Analysis Specialist will complete the Fiscal review the necessary documents to complete the Fiscal Monitoring Tool.</p> <p>The Management Analysis Specialist must only complete the Financial Review Requirement tab during the first fiscal review (whether it be onsite or desk monitoring). Only revised or newly created financial policies need to be reviewed during subsequent reviews.</p>
Complete the Onsite Programmatic or Fiscal Report.	<p>Following the completion of the review, complete either the Onsite Programmatic or Fiscal report. Provide an overview of the project. Note any findings associated with each tab of the monitoring tool. State any findings and corrective action plans that are needed based on the findings of the review.</p> <p>Management Analysis Specialists will submit the completed financial report to their supervisor for review.</p>
Send Compliance Letter or Corrective Action Letter with Report to subrecipient.	<p>If the subrecipient does not have any findings or corrective actions, send the Compliance Letter attached to the report to the subrecipient. If a corrective action plan is needed, send the Corrective Action Letter and report to the subrecipient detailing the findings.</p> <p>Each unit should copy the other when reports are issued.</p>
Assist subrecipient with corrective action plan.	<p>If the subrecipient needs to complete a programmatic corrective action plan, it is the Program Development Specialist's responsibility to provide technical assistance and make sure all corrective actions are completed by the due dates.</p> <p>If the subrecipient needs to complete a fiscal corrective action plan, the Management Analysis Specialists will review the corrective action plan steps</p>

	and determine whether the plan is acceptable. The Management Analysis Specialist will submit a corrective action plan response to their supervisor for review. After applicable approvals, the corrective action plan response will be sent to the subrecipient acknowledging that either the plan is sufficient or asking for additional information.
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Appendices

Appendix A: Subrecipient Invoice

Appendix B: SAMII Request Form

Appendix C: Contract Amendment Request Form

Appendix A: Subrecipient Invoice

Bill to: DSS DFAS P.O. Box 1082 Jefferson City, MO 65102-1082 DFAS.VOCAUNIT@dss.mo.gov		0
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Agency Name:	
Contract Number:	
Invoice Period:	
Remit Payment To:	
Address:	
Phone Number:	
Contact Person:	
Invoice # (10 character limit):	

CATEGORIES	Total Contracted Amount	Match	Federal Amount
Personnel			
Benefits			
PRN			
Volunteers			
On-Call Volunteers			
Travel/Training			
Equipment			
Supplies & Operations			
Contractual			
Indirect Costs			
Total:	\$ -	\$ -	\$ -

Amount to be Paid:	\$ -
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Contract Award Amount:		Match Award Amount:	
Less YTD Expenditures:		Less YTD Match:	
Remaining Balance:	\$ -	Remaining Balance:	\$ -

AGENCY SIGNATURE/TITLE	DATE
DSS DFAS REPRESENTATIVE SIGNATURE	DATE

Bill to: DSS DFAS P.O. Box 1082 Jefferson City, MO 65102-1082 DFAS.VOCAUNIT@dss.mo.gov	0
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Agency Name	0
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Invoice Number	0
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Total number of victims served during the invoice period:	
-----------------------------------------------------------	--

Of the total number of victims served, how many of those victims were new for the invoice period:	
---------------------------------------------------------------------------------------------------	--

Total number of hours spent on VOCA:	Paid Staff	
	Volunteers	

Specify how much VOCA funding is requested for reimbursement for the following categories	Child Abuse	
	Domestic Violence	
	Sexual Abuse	
	Underserved	
	Total	\$ -

List all approved trainings that were attended during this invoice period. Include the name of training, employee/volunteer name and title.

Appendix B: SAMII Payment Request Form

MISSOURI DEPARTMENT OF SOCIAL SERVICES
SAMII PAYMENT REQUEST FORM

Mail to:
DFAS Accounts Payable (A/P)
P.O. Box 1643
Jefferson City, MO 65102-1643

DFAS USE ONLY		
EFT _____	PAPER _____	VENDOR#:

***THIS FORM IS TO BE USED FOR VENDOR INVOICES PAID THROUGH SAMII ONLY; NO FORM REQUIRED FOR EMPLOYEE EXPENSES**

DIVISION	UNIT/OFFICE

CONTACT PERSON NAME	PHONE NUMBER

VENDOR/PAYEE NAME	AMOUNT OF PAYMENT

CONTRACT, ER, OR PG NUMBER <i>(if applicable)</i>

CODING INFORMATION:	
ORGANIZATION CODE(S) TO BE CHARGED:	
DESCRIPTION OF CODING OR FUNDING SOURCE <i>(Indicate the exact words from coding sheet):</i>	

SPECIAL INSTRUCTIONS FOR PAYMENT, IF APPLICABLE

DFAS USE ONLY--DO NOT WRITE/MARK BELOW

ENCUMBER:	DATE:
PURCHASING:	
PO#	COMM LINE: INIT/DATE:
ACCOUNTS PAYABLE	
DATA ENTRY:	APPROVAL:

Revised 7/7/14

Appendix C: Contract Amendment Request Form



**Division of Finance and Administrative Services
VOCA Unit
Contract Amendment Request**

Agency: _____

Requested By (Name): _____

Contact Email: _____

Contact Phone: _____

Contract Number: _____

Date Requested: _____

Effective Date: _____

(Amendment must be completed prior to requested changes taking effect)

Category(s) to be amended:

Personnel Personnel Benefits PRN Equipment Travel/Training
Supplies/Operations Contractual Volunteer Match On-Call Volunteer Match

Justification: Please provide the dollar amount to be adjusted from/to each category and a brief justification and explanation for each.

Agency Signature/Title: _____ Date: _____

VOCA Specialist: _____ Date: _____

Program Manager: _____ Date: _____

