



Victims of Crime Act (VOCA) Procedures Manual

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VICTIMS OF CRIME ACT 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 Crime Act Unit - VOCA Contact Information

Mailing Address	P.O. Box 1082 Jefferson City, MO 65102-1082
Physical Location	3705 Missouri Blvd. 2 nd Floor Jefferson City, MO 65109
Unit Phone	(573) 751-5775
Fax	
Email	FSD.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 Crime Act Unit - VOCA Operations

After contracts are awarded, the Victims of Crime Act 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 Crime Act 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

VOCA Program Specialists

The Victims of Violence - VOCA Program 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
- Travels to agencies to meet staff, tour facilities and observe operations
- Drafts and submits reports on site-visits for the Governor's Report
- Works with Agencies if they have a CAP report and review form the Monitoring unit.
- Provides technical assistance to subrecipients
- Assist subrecipients with questions pertaining to invoices
- Process the Data Monthly Data report
- Works with the Invoicing team to insure Agencies are invoicing in a timely manner, correctly, budget adjustments are done.
- Reviews and approves Budgets, Budget narrative, then sends over to Invoicing team once approved.
- Approves vehicle purchases, or any purchase over \$3000.0
- Enters subrecipient performance data into OVC's Performance Management Tool and ensures accuracy
- Enter all SARs reports and updated SARs in to the OVC PMT system
- Day-to-day contact with subrecipients
- Provides grant training, technical assistance, etc.
- Approves any trainings that sub recipients want to attend.
- Evaluates potential subrecipient applications and makes funding recommendations
- Completes risk assessments for all applicants that are recommended to be awarded VOCA funding

Time Submission

Victims of Crime act Unit - VOCA Staff, including the Victims of Crime Act Unit - VOCA Manager and Program Specialists, must submit timesheets.

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 Crime Act Unit - VOCA Manager on the Monday following the end of the pay period.

Overtime

Immediate supervisor must approve overtime. This may include blanket prior approval, which precludes the need to obtain specific approval on a day-to-day basis. Blanket approval generally applies to employees who are on call/ rotation or to other employees during peak workload periods. NOTE: Disciplinary action may be taken against employees who violate the requirement of obtaining prior approval for overtime.

Electronic Grant File

The Victims of Crime Act 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 FFY(Contract Timeframe)	
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	Subrecipirnt Folder (Agency Name)
	Budget , Budget Narrative, Budget Adjustments
	Award Documents
	Invoices/ Data Sheets
	Performance Data Quarterly and Yearly
	Monitoring
	Correspondence

All financial monitoring and Programmatic files will be maintained on the Compliance Unit drive and the Monitoring Unit DRive. A copy of the report will be emailed to Victim of Crime Act 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 Specialists will determine a standard naming convention.

Availability

Each Program 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 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 Specialist will return and whom to contact should there be an immediate need.

Correspondence and Communication

Program 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.

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 Crime Act 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 emailing to the Invoicing team at W&CI.INVOICES@dss.mo.gov and copy their Program Specialist for the VOCA email Box.

The Invoicing Team 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 Invoicing team determines the invoice is completed correctly, the expenses are reimbursable, and the second page of the invoice is complete, the Invoicing team member 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 D: SAM II Request Form*.

Division	DFAS
Unit/Office	VOCA
Contact Person	Invoicing Team Members Name
Phone Number	Invoicing Team Members 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 Invoicing team member 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 Data Reporting Spreadsheet in And save the Data Report in the appropriate electronic file in the VOCA drive.

A copy of the invoice and SAM II Request Form must be saved in the subrecipient's electronic file in the WDU 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
3418 Knipp Dr Suite B
Jefferson City, MO

Once Accounts Payment issues reimbursement, the Invoicing Team must enter paid date into the subrecipient's tab of the Master Spreadsheet.

Budget Adjustments and Amendments

Any adjustments between existing budget categories, shifts in programmatic functions, and adding or deleting budget categories requires a budget adjustment. When this occurs, the subrecipient must submit a Budget Adjustment form. The Invoicing team will review the request to ensure that all adjustments are allowable, allocable, necessary, and reasonable. Once approved, the Invoicing team will update the Master Spreadsheet. A copy of the Budget Adjustment form is located in *Appendix E: Budget Adjustment 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 Budget Adjustment Request form. In addition to being approved by the Program Specialist it must be approved by Victims of Crime Act Unit - VOCA Manager, . Save in the Electronic File in the VOCA drive and send a copy to the Invoicing team to update the master spreadsheet and save in the WDU drive.

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. VOCA Program 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 Specialist must ensure all information in the SAR is correct. Once data has been deemed accurate, the Program 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 Specialist of any changes of SAR information. The Program 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 Specialist will review the report's accuracy and enter the data into the PMT. It is the Program 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 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 Specialist must notify the Victims of Crime Act Unit - VOCA Manager. The Victims of Crime Act 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 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 October 1 – September 30	September 30 th	October 30 th	November 15 th

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 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 Crime Act 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 Unit - VOCA Manager and/or Program 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 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

(Note: Subrecipient agencies must provide 20 percent of the total project cost in cash or in-kind match unless match is waived)

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 **that is emailed to the Invoicing Unit email address W&CI.Invoices@dss.mo.gov**.

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.
- Materials/equipment: value should not exceed fair market value for item(s).

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]

- 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)

DSS VOCA Match Waiver Policy & Procedure

Introduction

Below are the policy and procedures of the Department of Social Services (DSS) to be used as a guide for approving VOCA match waivers. If this policy changes, DSS will submit to OVC the revised policy within 30-calendar days of the changes to this policy and will obtain OVC approval prior to making a waiver determination pursuant to the revised policy.

VOCA recipients are required to provide a 20% match share of the overall project cost (28 CFR 94.118) unless a Waiver of Match has been approved. Match requirements may be waived for programs that can provide documentation of need as outlined in 28 CFR 94.118(b)(3) of the VOCA Victim Assistance Final Rule.

Determining need for a waiver typically considers factors such as:

- Local resources;
- Annual budget changes;
- Past ability to provide match; and
- Whether the funding is for new or additional activities requiring additional match versus continuing activities where match is already provided.

Match requirements are automatically waived for subrecipients that are federally recognized American Indian or Alaska Native tribes, or projects that operate on tribal lands.

Projects funded in previous project periods are generally expected to provide the level of match as provided in the previous project period.

Waiver of Match Request Overview

VOCA recipients are required to provide a 20% match share of the overall project costs (28 CFR 94.118), unless a match waiver has been approved. Match requirements may be waived for programs that can provide documentation of need, as outlined in 28 CFR 94.118(b)(3) of the federal VOCA Victim Assistance Final Rule.

Match requirements are automatically waived for sub recipients who are federally recognized as American Indian or Alaska Native tribes, or projects that operate on tribal lands.

Projects funded in previous project periods are generally expected to provide the level of match as provided in the previous project period.

Determining Need for Waiver of Match Requests

The determination of need for a match waiver typically considers factors such as:

- Local resources;
- Annual budget changes;
- Past ability to provide match; and
- Whether the funding is for new or additional activities, requiring additional match versus continuing activities where match has already been provided.

In regards to any Waiver of Match request involving unique circumstances, the VOCA Program Manager will consult with the OVC Program Manager.

Submission of a Waiver of Match Request

The sub recipient's Project Point of Contact must submit a Waiver of Match Request letter for DSS approval determination. This applies to both full and partial waiver requests. The letter can be submitted:

- With a grant application, or
- During the period after the project start date, and up to 30-calendar days before the sub award project end date.

If a Waiver of Match Request letter is submitted after 30-calendar days before the sub award project end date, the DSS VOCA Unit Program Manager will then submit it to OVC for approval determination.

DSS will indicate if a Waiver of Match request, in full or partial, has been accepted, in the Notice of Funding Opportunity.

The Waiver of Match Request letter must:

1. Be type written on the program's agency letterhead, addressed, and sent to DSS;
2. Indicate the specific amount of match to be waived (both dollar amount and percentage);
3. Explain why the waiver is necessary/clarify the need for increased funding;
4. Clearly indicate/describe the hardship and/or type of circumstances that will hinder the program's ability to provide the required level of match;
5. Outline the issues related to the project's lack of resources (i.e. volunteers, other funding, in-kind donations);
6. Address what methods the organization has used to consider all possible options for meeting the match requirements;
7. Address if a match waiver is approved, does the organization anticipate this is a one-time request or are there extenuating circumstances that will require a waiver request next year;
8. Explain how the denial of a match waiver would impact the VOCA project;
9. Advise whether or not the program would have to decline all or part of the grant award if a match waiver is not granted;
10. Outline what steps the organization plans to take in order to be able to meet the match requirement in the future; and
11. Include the signature of the Project Point of Contact and the Authorized Official.

Final Determination Process for Waiver of Match Requests

Once received, the Waiver of Match Request letter will be reviewed by the VOCA Grant Manager for inclusion of the above criteria, and then forwarded with approval or denial recommendations to the Director or their designee.

If applicable when making determinations, the Grant Manager may consider the following:

1. How is the grant currently being matched? Consider past ability to provide match. (NOTE – OVC generally expects sub recipients to provide at least the same dollar amount of match it provided during the grant year immediately preceding the year of the waiver request unless changes in circumstances justifies a lower amount)
2. What circumstances exist that impede the organization's ability to partially or fully match the VOCA grant funds requested? (i.e. local resource restraints of a rural community with limited local funding availability or volunteer capacity)
3. Consider what practical and/or logical obstacles to providing match (i.e. public agencies that do not engage in private fundraising and may have limitations on soliciting contributing funds).
4. Local resource constraints (e.g., rural community with limited local funding availability or volunteer capacity).
5. Has the organization considered all possible options for meeting the match with in-kind and cash sources that are not being used as match on another federal grant? If so, what methods has the organization

- used to consider all possible options for meeting the match requirements?
6. What steps does the organization plan to take in order to be able to meet the match requirement in the future?
 7. If a match waiver is approved, does the organization anticipate this will be a one-time request or are there circumstances that will require a waiver request in the future?
 8. How would the denial of a match waiver impact the VOCA project?
 9. Would the program have to decline all or part of the grant award if a match waiver is not granted?

Utilizing the VOCA Match Waiver Final Determination form, the Grant Manager will draft recommendations that outline:

- Program information including a brief description of the project/services provided by the applicant.
- Justification for Approval or Denial of the waiver.
- The scope of the waiver including the waiver dollar and percentage amount.

NOTE – Even though a dollar amount is calculated, the Grant Manager’s actual Recommended Match Waiver is a percentage of the applicant’s total project cost. Upon award, the Approved Match Waiver is a fixed percentage that will be applied, should the project budget change.

The VOCA Grant Manager will then forward the Final Determination form to the DSS Director or their designee.

The DSS Director or their designee will consider the applicant’s Waiver of Match Request letter and the Grant Manager’s recommendations to make an official final determination, and sign the VOCA Match Waiver Final Determination form. The DSS Director or their designee will advise the Grant Manager of the final determination of denial or approval.

The Grant Manager will send an email notification to the program’s Project Point of Contact & the Authorized Official, with the VOCA Match Waiver Final Determination form and request they review it.

The Match Waiver Determination Letter will outline:

- A brief description of the project/services provided by the applicant;
- Justification for Approval or Denial of the waiver - state affirmatively that DSS approves or denies the waiver request and why; and
- The scope of the waiver including the waiver dollar and percentage amount.

NOTE – Though a dollar amount is calculated, the Grant Manager’s actual Approved Match Waiver is a percentage of the applicant’s total project cost. Upon award, an Approved Match Waiver is a fixed percentage that will be applied should the project budget change.

Match Waiver Requests submitted after 30-calendar days prior to the project end date will be submitted to OVC for prior approval by following the same procedure as above. However, approval or denial will not be communicated to the requesting program until OVC has made a determination.

The Grant Manager or designee will submit each approved match waiver determination to OVC (via GAN, or as otherwise specified by OVC) within 30-calendar days after approval.

The Grant Manager or designee will submit to OVC the match waiver spreadsheet, using the OVC template, showing all active waivers approved in a federal fiscal year, by no later than 90-calendar days after the fiscal year end.

Waiver of Match initiated by the Missouri Department of Social Services (SAA):

Missouri Department of Social Services can initiate Match Waivers either on an individual project, multi-project, or a blanket basis for VOCA recipients when there is a direct impact on services provided to victims of crime. DSS initiated Match Waivers are only to be used when Unique Circumstances exist.

- Natural Disasters
- Pandemics or other geographic health crisis
- Mass violence/victimization events
- Other events as determined by DSS

Procedure:

- 1) DSS determines that one of the above Unique Circumstances exists.
- 2) Notice of the DSS initiated Match Waiver is provided to impacted programs via email communication.
- 3) The Grant Manager or their designee will update the Performance Measurement Tool (PMT) System to reflect the Match Waiver in the SAR and make any necessary adjustments.
- 4) The Grant Manager will submit to OVC the match waiver spreadsheet, using the OVC template, showing all active waivers approved in a federal fiscal year; and determination letters by no later than 90-calendar days after the fiscal year end.

Match Waiver due to National Pandemic

Per the Office of Victims of Crime (OVC) bulletin released September 2021 stating that A State Administering Agency (SAA) may waive match either in total or part without OVC prior approval, provided that the SAA complies with the VOCA fix requirements, and the OVC processes, set forth below. VOCA fix supersedes the administrative rule at 28 C.F.R § 94.118(b)(3) that otherwise would require SAAs to submit waiver requests to OVC, provided the SAA meet its requirements.

The VOCA Fix, section 3(b), provides the following: "Beginning on the date a national emergency is declared under the National Emergencies Act (50 U.S.C. § 1601 et seq.) with respect to a pandemic and ending on the date that is one year after the date of the end of such national emergency, SAAs shall issue waivers for any matching requirement, in its entirety, for all eligible crime victim assistance programs contracted to provide services at that time." 34 U.S.C. 20103(a)(8). The national emergency with respect to the current pandemic began on March 1, 2020, and is ongoing as of September 2021. SAAs must issue match waivers during this time. OVC understands "any matching requirement, in its entirety" to mean the entirety of match required in an open VOCA sub award that remains unmet at the time of the waiver (see Sec. II, above).

Expiration of the National Emergency Pandemic Period: At the conclusion of a national emergency pandemic period, SAAs should honor all match waivers granted during that period until they expire at the end of the applicable VOCA sub award for which match was waived. New VOCA sub awards or discrete renewals or continuations made after the end of that period would no longer qualify for mandatory match waiver. Any match waiver requests for those sub awards should be considered under the SAAs ordinary match waiver process, outlined in Section III.

- The federal cash or in-kind match contribution requirements in paragraph 4.18.11 are removed for the current contract period and until further notice. Sub recipients are still encouraged to obtain and report as much match as possible.
- After the 1 year date of the National Pandemic ending match will be waived until the Federal Fiscal year end and the start of a new contract of October 1st.

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, , 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 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 Specialist recommends that the subrecipient grant file be closed. The Program Specialist should notify the Victims of 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 Monitoring Program Coordinator, 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.^[1] The purpose of the risk assessment is to establish a monitoring program that meets the following objectives:

- Compliance 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.

^[1] https://www.ecfr.gov/cgi-bin/text-idx?SID=870db2718d81511f58f280c0fdc0957d&node=se2.1.200_1205&rgn=div8

Each VOCA subrecipient's risk will be assessed after their respective grant has been awarded. 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
Previous Grant Experience
Frequent Staff Turnover
Complexity and Stability of Program
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. In cases of "unique circumstances", such as mass violence incident, natural disaster, or pandemic, DSS may conduct remote "on-site" reviews. Financial monitoring is done on the two year cycle unless an agency is such high risk more review is required. Currently the level of risk does not determine if fiscal will perform a desk or on-site review. All reviews are currently on-site.

Monitoring Type	High Risk Score: ≥ 2	Moderate Risk Score: 1.6-1.9	Low Risk Score: ≤ 1.5
Monitoring	On-site every 2 years or more frequently if determined necessary	Alternately on-site and desk every other monitoring cycle	On-site every 3 rd monitoring cycle

Subgrantees are required to submit monthly invoices and are reviewed for accuracy. Invoices are checked against the approved budget, expenditures reported for this period, funds expended to date, and the balance. Subgrantees are required to submit quarterly reports which capture the number of victims served by type of victimization, as well as programmatic information. This information is reviewed and compiled for the federal reporting database and annual report to OVC for VOCA subrecipients. All subgrantees receive a programmatic desk review during the contract period. A more in-depth desk review will take place for subgrantees who are considered high or medium risk based on the above chart.

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 Performance Monitoring Unit - 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, Monitoring Program Development Specialist (PDS) 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 Auditor will submit the proposed monitoring schedules to the Performance Monitoring Unit Program Coordinator and Compliance Unit Auditor respectively for approval. The monitoring schedules for the VOCA/DVSS 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/DVSS programs. To complete this tab, the PDS 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 PDS 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/DVSS funds properly and policies and procedures were followed.

Bank Statement Reconciliation Review	Onsite Monitoring Fiscal	This tab facilitates the review and testing of the bank statement reconciliation process in accordance with policies and procedures.
Purchasing Review	Onsite Monitoring Fiscal	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 and state VOCA/DVSS funds.
Property Asset Review	Onsite Monitoring Fiscal	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/DVSS-funded programs 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/DVSS award(s). 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/DVSS-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 for VOCA funded agencies. For DVSS funded agencies staff will review data that was provided for the Monthly Service Report (MSR).
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 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 along with the Program Monitoring Unit Program Coordinator 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 and on MSR's 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
<p>Send subrecipient the Subrecipient Desk Review Prep Letter</p>	<p>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 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>
<p>Complete the Programmatic or Fiscal Monitoring Tool – Desk Review workbook.</p>	<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 DSS DVSS/VOCA staff member 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>
<p>Draft the Programmatic or Fiscal Desk Monitoring Report</p>	<p>Based on the findings during the review, complete the Programmatic/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.	Once the Programmatic/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. Provide the appropriate Program Development Specialist with a copy of the letter and report.
Corrective Action Plan Follow-Up	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.

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/DVSS 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 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. The Questionnaire must be completed prior to the first onsite monitoring. The subrecipient does not need to complete the Questionnaire before all onsite reviews.
Onsite Review Preparation	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.
Onsite Programmatic Review	The Program Development Specialist will meet with the subrecipient’s VOCA/DVSS programmatic staff to complete the Interview tab of the Programmatic Monitoring Tool. While onsite, the Program Development Specialist will review the necessary documents to complete the monitoring tool.
Onsite Fiscal Review	The Program Development Specialist will complete the Fiscal review the necessary documents to complete the Fiscal Monitoring Tool. The Program Development 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>	<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>Program Development Specialists will submit the completed financial report to their supervisor for review.</p>
<p>Send Compliance Letter or Corrective Action Letter with Report to subrecipient.</p>	<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>
<p>Assist subrecipient with corrective action plan.</p>	<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 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.</p>

Site Visit

VOCA Program Specialist will visit each agency, tour the facility, qualify GAPS in service and breakdown the barriers between the Agency and the staff.

The Program Specialist will complete the following tasks for the Site Visit

Task	Instructions
<p>Email the date and time for Site Visit two weeks prior to Site Visit.</p>	<p>Allow agency to respond with approval of date and time. If it does not work with the Agency to agree on a date and time best for all. .</p>
<p>Site Visit Preparation</p>	<p>. Send Agency Questionnaire. Prepare folders with Units flyers and Resource guide. VOCA Resource Links page, Copy of the SARS with Appendix., OVC Performance Measure Dictionary and Terminology Resource Guide, PMT User Guide, Copy of Forms,</p>

	Disclosure of Lobbying Activities, SARS, Quarterly Reports, Change of Information Form, Equipment List form, Vehicle Request to Purchase form, Budget Form, Budget Adjustment Form, Invoice, Expenditure Sheet and Data Reporting sheet, Budget Narrative, Cap Letters or Monitoring Reports for the Agency and the Activity Timesheets, along with the schedule of when quarterly reports are due.
Site Visit Review	The Program Specialist will meet with the subrecipient's VOCA staff to . Go over the Questionnaire, talk about the gaps in Service, go over forms , answer any questions talk about any concerns. As well as tour the facility.
Completed Site Visit	Following the completion of the Site Visit. , review completed Questionnaire. Make your notes to VOCA Program Coordinator about the visit to include Gaps in Service and a Success Story.

CERTIFICATIONS REGARDING LOBBYING; DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

Applicants should refer to the regulations and other requirements cited below to determine the certification to which they are required to attest. Applicants should also review the instructions for certification included in the regulations or other cited requirements before completing this form. The certifications shall be treated as a material representation of fact upon which reliance will be placed when the U.S. Department of Justice (“Department”) determines to award the covered transaction, grant, or cooperative agreement.

1. LOBBYING

As required by 31 U.S.C. § 1352, as implemented by 28 C.F.R. Part 69, the Applicant certifies and assures (to the extent applicable) the following: (a) No Federal appropriated funds have been paid or will be paid, by or on behalf of the Applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any Federal grant, the entering into of any cooperative agreement, or the extension, continuation, renewal, amendment, or modification of any Federal grant or cooperative agreement; (b) If the Applicant’s request for Federal funds is in excess of \$100,000, and any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with this Federal grant or cooperative agreement, the Applicant shall complete and submit Standard Form - LLL, “Disclosure of Lobbying Activities” in accordance with its (and any DOJ awarding agency’s) instructions;

and (c) The Applicant shall require that the language of this certification be included in the award documents for all subgrants and procurement contracts (and their subcontracts) funded with Federal award funds and shall ensure that any certifications or lobbying disclosures required of recipients of such subgrants and procurement contracts (or their subcontractors) are made and filed in accordance with 31 U.S.C. § 1352.

Each subrecipient shall sign and return a [Disclosure of Lobbying Activities](#) form for each contract. It should be noted that the “Award Amount” is the amount of the contract, which includes additional amounts granted each renewal year.

Each subrecipient shall read and sign a [Certification Regarding Lobbying Form](#) for each contract as well.

2. DEBARMENT, SUSPENSION, AND OTHER RESPONSIBILITY MATTERS

Pursuant to Department regulations on nonprocurement debarment and suspension implemented at 2 C.F.R. Part 2867, and to other related requirements, the Applicant certifies, with respect to prospective participants in a primary tier “covered transaction,” as defined at 2 C.F.R. § 2867.20(a), that neither it nor any of its principals-- (a) is presently debarred, suspended, proposed for debarment, declared ineligible, sentenced to a denial of Federal benefits by a State or Federal court, or voluntarily excluded from covered transactions by any Federal department or agency; (b) has within a three-year period preceding this application been convicted of a felony criminal violation under any Federal law, or been convicted or had a civil judgment rendered against it for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, tribal, or local) transaction or private agreement or transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, tax evasion or receiving stolen property, making false claims, or obstruction of justice, or commission of any offense indicating a lack of business integrity or business honesty that seriously and directly affects its (or its principals’) present responsibility; (c) is presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, tribal, or local) with commission of any of the offenses enumerated in paragraph (b) of this certification; and/or (d) has within a three-year period preceding this application had one or more public transactions (Federal, State, tribal, or local) terminated for cause or default. B. Where the Applicant is unable to certify to any of the statements in this certification, it shall attach an explanation to this application. Where the Applicant or any of its principals was convicted, within a three-year period preceding this application, of a felony criminal violation under any Federal law, the Applicant also must disclose such felony criminal conviction in writing to the Department (for OJP Applicants, to OJP at Ojpcompliancereporting@usdoj.gov; for OVW Applicants, to OVW at OVW.GFMD@usdoj.gov; or for COPS Applicants, to COPS at AskCOPSRC@usdoj.gov), unless such disclosure has already been made.

Determination of suitability required, in advance, for certain individuals who may interact with participating minors

The purpose of this policy generally is to protect individuals under 18 years of age receiving services from the recipient (and any subrecipient at any tier) through suitability determination procedures.

1. Advance determination regarding suitability.

The recipient (and any subrecipient at any tier) may not permit any covered individual to interact with any participating minor in the course of activities under the award, unless the recipient or subrecipient first has made a written determination of the suitability of that individual to interact with participating minors, based on current and appropriate information as described in paragraph 3.E., and taking into account the factors and considerations described in paragraph 4.

2. Updates and reexaminations

A. The recipient (or subrecipient) must, at least every five years, update the searches described in paragraph 3.E.1. and 2., reexamine the covered individual's suitability determination in light of those search results, and, if appropriate, modify or withdraw that determination.

B. The recipient also must reexamine a covered individual's suitability determination upon learning of information that reasonably may suggest unsuitability and, if appropriate, modify or withdraw that determination.

3. Definitions

A. "Covered individual" means any individual (other than a participating minor, as defined in this condition, or a client of the recipient (or subrecipient)) who is expected, or reasonably likely, to interact with any participating minor (other than the individual's own minor children). A covered individual need not have any particular employment status or legal relationship with the recipient (or subrecipient). Such an individual might be an employee of a recipient (or subrecipient), but also might be (for example) a consultant, contractor, employee of a contractor, trainee, volunteer, or teacher.

B. "Participating minor." All individuals under 18 years of age within the set of individuals described in the scope section of this condition as it appears on the award document are participating minors.

C. "Interaction" includes physical contact, oral and written communication, and the transmission of images and sound, and may be in person or by electronic (or similar) means. But "interaction" does not include--

(1) brief contact that is both unexpected by the recipient (or subrecipient) and unintentional on the part of the covered individual -- such as might occur when a postal carrier delivers mail to an administrative office.

(2) personally-accompanied contact -- that is, infrequent or occasional contact (for example, by someone who comes to make a presentation) in the presence of an accompanying adult, pursuant to written policies and procedures of the recipient (or subrecipient) that are designed to ensure that -- throughout the contact -- an appropriate adult who has been determined to be suitable pursuant to this condition will closely and personally accompany, and remain continuously within view and earshot of, the covered individual.

D. "Activities under the award." Whether paid for with federal funds from the award, "matching" funds included in the OJP-approved budget for the award, or "program income" for the award as defined by the (DOJ) Part 200 Uniform Requirements), activities under the award include both--

(1) activities carried out under the award by the recipient (or subrecipient); and

(2) actions taken by an entity or individual pursuant to a procurement contract under the award or to a procurement contract under a subaward at any tier.

E. "Current and appropriate information"

In addition to information resulting from checks or screening required by applicable federal, state, tribal, or local law, and/or by the recipient's (or subrecipient's) written policies and procedures, current and appropriate information includes the results of all required searches listed below, each of which must be completed no earlier than six months before the determination regarding suitability.

(1) Public sex offender and child abuse websites/registries

A search (by current name, and, if applicable, by previous name(s) or aliases), of the pertinent and reasonably- accessible federal, state, and (if applicable) local and tribal sex offender and child abuse websites/public registries, including--

- (a) the Dru Sjodin National Sex Offender Public Website (www.nsopw.gov);
- (b) the website/public registry for each state (and/or tribe, if applicable) in which the individual lives, works, or goes to school, or has lived, worked, or gone to school at any time during the past five years; and
- (c) the website/public registry for each state (and/or tribe, if applicable) in which the individual is expected to, or reasonably likely to, interact with a participating minor in the course of activities under the award.

(2) Criminal history registries and similar repositories of criminal history records

For each individual at least 18 years of age who is a covered individual under FY award, beginning with FY2019 and all subsequent FY grants following, a fingerprint search (or, if the recipient or subrecipient documents that a fingerprint search is not legally available, a name-based search, using current and, if applicable, previous names and aliases) -- encompassing at least the time period beginning five calendar years preceding the date of the search request -- of pertinent state (and, if applicable, local and tribal) criminal history registries or similar repositories, including--

- (a) the criminal history registry for each state in which the individual lives, works, or goes to school, or has lived, worked, or gone to school at any time during the past five years; and
- (b) the criminal history registry for each state in which he or she is expected to, or reasonably likely to, interact with a participating minor in the course of activities under the award.

4. Factors and considerations in determinations regarding suitability

In addition to the factors and considerations that must or may be considered under applicable federal, state, tribal, or local law, and under the recipient's (or subrecipient's) written policies and procedures, in making a determination regarding suitability, the recipient (or subrecipient) must consider the current and appropriate information described in paragraph 3.E.

In particular (unless applicable law precludes it), with respect to either an initial determination of suitability or a subsequent reexamination, the recipient (or subrecipient) may not determine that a covered individual is suitable to interact with participating minors in the course of activities under the award if the covered individual--

- A. Withholds consent to a criminal history search required by this condition;
- B. Knowingly makes (or made) a false statement that affects, or is intended to affect, any search required by this condition;
- C. Is listed as a registered sex offender on the Dru Sjodin National Sex Offender Public Website;
- D. To the knowledge of the recipient (or subrecipient), has been convicted -- whether as a felony or misdemeanor -- under federal, state, tribal, or local law of any of the following crimes (or any substantially equivalent criminal offense, regardless of the specific words by which it may be identified in law):
 - (1) sexual or physical abuse, neglect, or endangerment of an individual under the age of 18 at the time of the offense;
 - (2) rape/sexual assault, including conspiracy to commit rape/sexual assault;
 - (3) sexual exploitation, such as through child pornography or sex trafficking;

- (4) kidnapping;
- (5) voyeurism; or

E. Is determined by a federal, state, tribal, or local government agency not to be suitable.

5. Administration; rule of construction

A. The requirements of this condition are among those that must be included in any subaward (at any tier), and must be monitored. They apply as of the date of acceptance of this award, and throughout the remainder of the period of performance.

B. The recipient is to contact the Missouri Department of Social Services Victims of Crime Unit with any questions regarding the requirements of this condition and must not allow a covered individual to interact with a participating minor until such questions are answered.

C. Award funds may be obligated for the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition, provided that such funds would not supplant non-federal funds that would otherwise be available for such costs.

D. Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal, state, tribal, or local law, including any applicable civil rights or nondiscrimination law.

6. Monitoring Checklist

A. A checklist used by monitoring can be obtained at <https://ovc.ojp.gov/sample-suitability-determination-for-subrecipient-monitoring-checklist.pdf>

I. Requirement to report actual or imminent breach of personally identifiable information (PII)

The purpose of this Policy generally is to protect individuals' privacy and specifically to comply with federal requirements related to the receipt of federal grants.

A. WHAT IS PERSONALLY IDENTIFIABLE INFORMATION?

"Personally Identifiable Information ("PII")" means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Some information that is considered to be PII is available in public sources such as telephone books, public websites, and university listings. This type of information is considered to be Public PII and includes, for example, first and last name, address, work telephone number, email address, home telephone number, and general educational credentials. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. Non-PII can become PII whenever additional information is made publicly available, in any medium and from any source, that, when combined with other available information, could be used to identify an individual.

B. HOW CAN PII BE SAFEGUARDED?

In order to protect individuals' privacy and to prevent the disclosure of PII by anyone who has access to PII, before publicly disclosing any records or information in the possession of the agency that contains PII, the person disclosing said records or information shall redact all PII contained within the records or information. At a minimum, the following information shall not be disclosed, and shall be redacted from records that are being disclosed, when such

information is associated with a person's first and last name: • Date of birth • Home address • Personal phone number • Personal email address • Driver license number • Social Security number • Any other information that could be used to identify an individual, whether by itself or when combined with other available information CRIME VICTIMS

C. REQUIREMENT TO REPORT

Departments or offices that receive federal grant money under the federal Victims of Crime Act of 1984 ("VOCA") shall reasonably protect the confidentiality and privacy of persons receiving services provided by the VOCA grant. A crime victim is defined as a person who has suffered physical, sexual, financial, or emotional harm as a result of the commission of a crime. In addition to not disclosing PII as stated above, anyone who has access to a crime victim's information shall not disclose, reveal, or release any individual client information without the informed, written, reasonably time-limited consent of the person about whom information is sought. Consent cannot be given by the abuser of a minor, incapacitated person, or the abuser of the other parent of a minor. If release of a crime victim's information is compelled by statute or court order, the department or office shall make reasonable attempts to provide notice to the victim affected by the disclosure and take reasonable steps necessary to protect the privacy and safety of the persons affected by the disclosure. **FEDERALLY FUNDED GRANTS:** Any department or office that receives federal grant funding is encouraged to make and enforce any further policy regarding the release of PII if specifically required by a specific grant.

D. RESPONSE IN THE EVENT OF AN ACTUAL OF IMMINENT "BREACH"

1. A staff member will be designated as the individual responsible for ensuring the implementation of the plan.
2. Any employee who becomes aware of an actual or imminent breach of PII must report to the designated staff member upon first becoming aware of the breach.
3. The designated staff member will notify all affected parties whose PII data may have been compromised, and notification will include the remedy by which any damages as a result of the data breach will be rectified.
4. If a PII breach has occurred or an imminent breach has been detected, the agency will immediately report the actual or perceived breach to OJP Program Manager. The notification will include a description of the nature of the breach of PII and the actions taken to remedy the breach.

E. Training

The agency should describe its procedure to provide periodic training for agency employees in how to implement the plan and distribute a copy of this plan to all staff members.

Appendices

Appendix A: Subrecipient Invoice

Appendix B: Subrecipient Monthly Expenditure Report

Appendix C: Subrecipient Monthly Data Report

Appendix D: SAMII Request Form

Appendix E: Budget Adjustment Form

Appendix F: Sample Match Waiver Letter R



BILL TO:
 Department of Social Services
 Division of Finance & Administrative Services
 PO Box 1643
 Jefferson City, MO 65102-2320
W&CI.Invoices@dss.mo.gov

PAY TO: _____
 Agency Name: _____
 Address: _____
 City, State Zip: _____
 Phone Number: _____
 Email address: _____

REQUEST FOR PAYMENT OF VOCA FFY 2022 CONTRACT

FEIN # _____ **Contact No.** _____ **Invoice #:** _____
Region: _____ **Date:** _____
 (current)

		Current Period's
DESCRIPTION		Federal Amount
Expenses for invoice period :	Child Abuse	\$ -
	Domestic Violence	\$ -
	Sexual Assault	\$ -
	Underserved	\$ -
		\$ 0 -

I hereby certify that this information is true and correct:

Monthly Expenditure Report Attached:
 Yes
 No

Signature _____ Date _____

*Note: Monthly Invoice is due on or by the 15th day of the month.
 If invoice is emailed, retain original in your files.*

FOR OFFICIAL USE ONLY:

Signature	Date	Date Stamp

If the vendor provides any "personal information" as defined in §105.1500, RSMo concerning an entity exempt from federal income tax under Section 501(c) of the Internal Revenue Code of 1986, as amended, the vendor understands and agrees that it is voluntarily choosing to seek a state contract and providing such information for that purpose. The state will treat such personal information in accord with §105.1500, RSMo.



Missouri Department of Social Services
Division of Finance & Administrative Services
P. O. Box 1643, Jefferson City, MO 65102-2320
W&CI.Invoices@dss.mo.gov
FFY 2023 VOCA Monthly Expenditure Report

Agency:	Region:	Invoice Period:			
Program Period:					
BUDGET LINE ITEMS	BUDGETED	Monthly Expenditures	YTD Total	Budget Remaining	Match Amount
Totals:	\$ -	\$ -	\$ -	\$ -	\$ -
Personnel:	\$ -	\$ -	\$ -	\$ -	\$ -
Benefits:	\$ -	\$ -	\$ -	\$ -	\$ -
PRN:	\$ -	\$ -	\$ -	\$ -	\$ -
Volunteers:	\$ -	\$ -	\$ -	\$ -	\$ -
On Call Volunteers:	\$ -	\$ -	\$ -	\$ -	\$ -
Travel/Training:	\$ -	\$ -	\$ -	\$ -	\$ -
Equipment:	\$ -	\$ -	\$ -	\$ -	\$ -
Supplies & Operations:	\$ -	\$ -	\$ -	\$ -	\$ -
Contractual:	\$ -	\$ -	\$ -	\$ -	\$ -
Indirect Cost:	\$ -	\$ -	\$ -	\$ -	\$ -
<i>This expenditure report is to be submitted with your agency's monthly billing invoice and is due by the 15th day of the month.</i> <i>Please Note: We will no longer accept faxed copies.</i>					
Mail original documents with original signatures to: Missouri Department of Social Services Division of Finance & Administrative Services P.O. Box 1643 Jefferson City, MO 65102 W&CI.Invoices@dss.mo.gov					
I hereby certify that this information is true and correct:					
Preparer's Signature:				Date:	

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Missouri Department of Social Services
 Division of Finance & Administrative Services
 P. O. Box 1643, Jefferson City, MO 65102-2320
 FSD.VOCAUNIT@DSS.MO.GOV
 FFY 2023 VOCA Monthly Data Report

Agency:	Invoice Period:
Region:	Invoice Number:

Total Number of VICTIMS SERVED for the invoicing Period:	0
Out of the total number of victims served, how many were "NEW" for the invoice period:	0

Total Number of hours spent on VOCA:	Specify the dollar amount in this month's invoice that is allocated to the following categories: **The dollar amount needs to equal the same amount requested for reimbursement																
Volunteers:	<table border="1"> <tr> <td>Child Abuse</td> <td>\$ -</td> <td>Sexual Abuse</td> <td>\$ -</td> </tr> <tr> <td>Domestic Violence</td> <td>\$ -</td> <td>Underserved</td> <td>\$ -</td> </tr> <tr> <td>TOTAL</td> <td>\$ -</td> <td></td> <td></td> </tr> <tr> <td>TOTAL MATCH Reported</td> <td>\$ -</td> <td></td> <td></td> </tr> </table>	Child Abuse	\$ -	Sexual Abuse	\$ -	Domestic Violence	\$ -	Underserved	\$ -	TOTAL	\$ -			TOTAL MATCH Reported	\$ -		
Child Abuse	\$ -	Sexual Abuse	\$ -														
Domestic Violence	\$ -	Underserved	\$ -														
TOTAL	\$ -																
TOTAL MATCH Reported	\$ -																

Approved Trainings Attended for this Invoice:

Name of Training	Name of Attendee	Position of Attendee

This data report is to be submitted with your agency's monthly billing invoice and is due by the 15th day of the month.
Please note: we will no longer accept faxed copies.

Missouri Department of Social Services
 Division of Finance & Administrative Services
 P.O. Box 1643
 Jefferson City, MO 65102
FSD.VOCAUNIT@DSS.MO.GOV

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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

*Missouri Department of Social Services
FFY2023 VOCA "Revised" Budget Change Request Form*

Agency:	Contract Number:
Region:	

Program Year October 2022 - September 30, 2023

Revenue	Budget
Allocation Base for FFY 20 Fund	\$ -
Allocation Base for FFY 21 Fund	\$ -
Allocation Base for FFY 22 Fund	\$ -
Allocation Base for FFY ARPA Fund	\$ -
Total Administrative Allocation	\$ -

Direct Administrative Costs	Original Budget Amount	Increase (Decrease)	Revised Budget Amount
Personnel	\$ -	\$ -	\$ -
Benefits	\$ -	\$ -	\$ -
Travel Training	\$ -	\$ -	\$ -
Equipment	\$ -	\$ -	\$ -
Supplies & Operations	\$ -	\$ -	\$ -
Contractural	\$ -	\$ -	\$ -
Indirect Cost	\$ -	\$ -	\$ -
(\$ -	\$ -	\$ -	\$ -
(\$ -	\$ -	\$ -	\$ -
Total Budget	\$ -	\$ -	\$ -

Submit to: W&CI.INVOICES@dss.mo.gov

I hereby certify that the budget is taken from the original Books of Account and that budget amounts are valid and consistent with the terms of the contract.

Signature of Authorized Representative of [Insert Agency Name]	Date
---	-------------

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Match Waiver Request Sample Letter

Subrecipient Agency Letterhead

Date

To: DSS VOCA Program Manager

Address

RE: Match Waiver Request for Federal Grant number 20xx-XX-XX-####

Dear Program Manager:

In reference to:

Federal Grant number: 20xx-XX-XX-####

Name of Subrecipient Agency:

Subgrant Number:

Project Period:

TOTAL Award Amount:

Match required (before waiver):

Subrecipient Agency can meet: \$ amount

Subrecipient Agency Requests to be waived: \$ amount

Percent of Waiver request: amount %

Justification:

Sincerely,

Qualified signatory

Executive Director, President, CFO, CEO