

# Grant Administration Policies & Procedures

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# 1. Annual Grant Application Announcement (GAA) Development

*Adopted: 3/12/20, Rev. 8/13/2021, Rev. 3/24/2023*

This policy reflects the procedure to ensure the Grant Application Announcement (GAA) requirements for federal and state funding are complete and accurate. As the State Administering Agency for Idaho VOCA and FVPSA funds, it is necessary the Program Administration Manager and ICDVVA staff understand the regulations associated with each source of grant funding administered by the Council. The following procedures are in place to ensure the Council issues an accurate and complete GAA to applicants annually.

1. Each year prior to issuing the GAA(s), the Program Administration Manager and ICDVVA staff must obtain updated requirements: Final Rule for VOCA, CFR for FVPSA, and applicable State Statute for State DV Funds as well as the current administrative rules governing Domestic Violence Council Grants.
2. The Program Administration Manager will review the regulations, compare to the prior year GAA, and a) update the solicitation to comply with the most current rules, statutes and regulations, and b) draft or update any new GAA(s) to be released for the upcoming grant cycle.
3. After the Program Administration Manager has made updates to the GAA(s), the Executive Director will review the most current rules, statutes and regulations for each funding source and review the GAA(s) for compliance.
4. The Council will vote to approve the GAA(s) prior to the Council releasing solicitations for applications each year.

## 2. Civil Rights Compliance Requirements

*Adopted: March 5, 2021; Rev. 8/13/2021, 11/5/2021, & 12/8/2023*

### **BACKGROUND AND PURPOSE:**

The Idaho Council on Domestic Violence and Victim Assistance (ICDVVA), attached to the Department of Health and Welfare (DHW) for budgetary and administrative purposes, is a recipient and administrator of federal funds granted to it by the U.S. Department of Justice (DOJ) through the VOCA Victim Assistance Formula Grant. As a recipient of these funds, ICDVVA has the obligation not to discriminate against protected classes of people either in employment or in the delivery of services, or to retaliate against an individual for taking action or participating in action to secure rights protected by applicable federal laws.

ICDVVA adopts these civil rights complaint procedures so that individuals can file complaints against ICDVVA or its VOCA-funded subrecipients under the following statutes and regulations, which collectively prohibit discrimination based on race, color, national origin, sex, religion, disability, and age:

- Victims of Crime Act (VOCA) of 1984, as amended, 34 U.S.C. § 20110(e) and the regulation implementing the Victim of Crime Act Victim Assistance Program, 28 C.F.R. § 94.114 (prohibiting discrimination in programs funded under the statute, both in employment and in the delivery of services or benefits, based on race, color, national origin, sex, religion, and disability);
- Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin in the delivery of services (42 U.S.C § 2000d), and the DOJ implementing regulation at 28 C.F.R. Part 42, Subpart C;
- Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination on the basis of disability in the delivery of services and employment practices (29 U.S.C. § 794) and the DOJ implementing regulation at 28 C.F.R. Part 42, Subpart G;
- Title II of the Americans with Disabilities Act of 1990, which prohibits discrimination on the basis of disability in the delivery of services and employment practices (42 U.S.C. § 12132) and the DOJ implementing regulation at 28 C.F.R. Part 35;
- Title IX of the Education Amendments of 1972, which prohibits discrimination on the basis of sex in education programs and activities (20 U.S.C. § 1681), and the DOJ implementing regulation at 28 C.F.R. Part 54;
- The Age Discrimination Act of 1975, which prohibits discrimination on the basis of age in the delivery of services (42 U.S.C. § 6102), and the DOJ implementing regulation at 28 C.F.R. Part 42, Subpart I; and

- The DOJ regulation on the Partnerships with Faith-Based and Other Neighborhood Organizations, which prohibits discrimination on the basis of religion in the delivery of services and prohibits organizations from using DOJ federal financial assistance for explicitly religious activities (28 C.F.R. Part 38)

## **COMPLAINT PROCEDURES**

ICDVVA and its VOCA-funded subrecipients shall comply with the following procedures if a complaint is received alleging: (1) discrimination in services or employment because of race, color, national origin, sex, religion, or disability, or discrimination in services because of age, or (2) retaliation for engaging in a protected activity.

### Procedure for filing a complaint against ICDVVA

1. Complaints may be filed with DHW verbally, in writing, or by telephone.
2. The complaint will state the date, place, and nature of the discriminatory action and will specify the remedy sought by the complainant.
3. The complaint should be filed with: Civil Rights Manager, Division of Human Resources, Idaho Department of Health and Welfare, P.O. Box 83720, Boise, Idaho 83720-0036.
4. Complaints should be filed within 180 days after the alleged discriminatory action has taken place; however, complaints alleging violations of VOCA may be filed up to one year after the event. (This time limit may be extended by the Civil Rights Manager based on reasonable evidence that 180 days is not sufficient.)
5. The complaint may be filed by either the complainant or a designated representative. Complaints may also be filed anonymously. Confidentiality will be protected to the extent possible in investigating the complaint.
6. A Complaint form is available on the ICDVVA website at:  
<https://icdv.idaho.gov/resources/civil-rights/>

### **Responsibilities of DHW:**

1. Within thirty (30) calendar days after receiving the complaint, the Civil Rights Manager will investigate the incident and issue a written finding of whether or not evidence of discrimination was found. The investigation may include interviews with the complainant and ICDVVA staff.

2. If discrimination is found, within thirty (30) days, the Civil Rights Manager, in cooperation with the Division of Human Resources, will recommend and assist in correcting the discriminatory action in the operating unit and in preventing future discriminatory action.
3. If the complainant does not agree with the findings of DHW, the complainant has thirty (30) days to provide additional information to the Civil Rights Manager to facilitate further review of the complaint. The complainant will be notified of the right to appeal DHW's conclusions to the proper federal compliance agency.
4. No individual who has filed a complaint, testified, assisted, or participated in any manner in the investigation of a complaint shall be intimidated, coerced, or otherwise discriminated against.
5. Records of all complaints and investigations filed under this procedure will be retained by the Civil Rights Manager, in the Division of Human Resources, for a period of three (3) years, and shall be kept confidential.
6. A Complaint form is available on the ICDVVA website at: <https://icdv.idaho.gov/resources/civil-rights/>

**Procedure for filing a complaint against ICDVVA subrecipients from a client, customer, program participant, applicant or consumer:**

1. Complaints may be filed with ICDVVA verbally, in writing, or by telephone.
2. The complaint will state the date, place, and nature of the discriminatory action and will specify the remedy sought by the complainant.
3. The complaint should be filed with: Executive Director, Idaho Council on Domestic Violence and Victim Assistance, P.O. Box 83720, Boise, Idaho 83720-0036.
  - *The complaint must include the following information:*
    - a. Name, address, and telephone number of the complainant.
    - b. The victim or other witness of the alleged discrimination, if it is someone other than the complainant.
    - c. The basis for the complaint: (1) discrimination in services based on race, color, national origin, sex, religion, disability, or age, or (2) retaliation for engaging in protected activity.
    - d. The date of alleged discriminatory or retaliatory conduct.

- e. The name and title of the person who is alleged to have engaged in the discriminatory conduct.
  - f. The complaint must be in writing, dated, and signed by the complainant.
4. Complaints should be filed within 180 days after the alleged discriminatory action has taken place. (This time limit may be extended by the Executive Director based on reasonable evidence that 180 days is not sufficient or if the complaint alleges a violation of VOCA.)
5. The complaint may be filed by either the complainant or a designated representative. Complaints may also be filed anonymously. Confidentiality will be protected to the extent possible in investigating the complaint.

**Responsibilities of ICDVVA:**

1. Within thirty (30) calendar days after receiving the complaint, the Executive Director, in cooperation with DHW's Civil Rights Manager, will investigate the incident and issue a written finding of whether or not evidence of discrimination was found. The investigation may include interviews with the complainant and ICDVVA/DHW staff.
2. If discrimination is found, within thirty (30) days, the Executive Director, in cooperation with the Civil Rights Manager, will recommend and assist in correcting the subrecipient's discriminatory action and in preventing future discriminatory action.
3. If the complainant does not agree with the findings of ICDVVA/DHW, the complainant has thirty (30) days to provide additional information to the Executive Director to facilitate further review of the complaint. The complainant will be notified of the right to appeal the ICDVVA/DHW conclusions to the proper federal compliance agency.
4. No individual who has filed a complaint, testified, assisted, or participated in any manner in the investigation of a complaint shall be intimidated, coerced, or otherwise discriminated against.
5. Records of all complaints and investigations filed under this procedure will be retained by the Civil Rights Manager in Human Resources for a period of three (3) years and shall be kept confidential.
6. If ICDVVA investigates a complaint that involves a federal civil rights law over which the Office for Civil Rights, Office of Justice Programs, DOJ (DOJ OCR) has jurisdiction, the DOJ OCR may (a) conduct a supplementary or de novo investigation; (b) approve, modify, or reject recommended findings; (c) approve, modify, or reject a proposed voluntary resolution; and (d) initiate formal enforcement action.

## **Procedure for filing a complaint Against ICDVVA subrecipients from a subrecipient employee:**

If ICDVVA receives a complaint directly from a subrecipient employee alleging discrimination in their employment, ICDVVA will not investigate the complaint. Instead, the ICDVVA Executive Director shall refer any employment complaint to the subrecipient to address the complaint consistent with its procedures for handling such matters, if it has such procedures, or the U.S. Equal Employment Opportunity Commission for investigation and disposition, if the subrecipient lacks such procedures.

### **ICDVVA CIVIL RIGHTS TRAINING**

- All ICDVVA staff members will be trained on this policy to ensure that they are aware of ICDVVA procedures and responsibilities in addressing complaints or potential discrimination issues. Annual training will also include a review of additional civil rights policies and procedures and the EEOP training module.
- ICDVVA shall provide a link to the DOJ OCR's training module, and will notify subrecipients, through its grant solicitation, of the requirement to complete the training module at least every three years. ICDVVA has made a training link available at <http://icdv.idaho.gov/civil-rights-training.html>.
- ICDVVA will maintain all training records of ICDVVA staff.
- ICDVVA subrecipients must provide proof of civil rights training during ICDVVA monitoring.

### **ICDVVA CIVIL RIGHTS NOTIFICATION**

- ICDVVA will notify staff and subrecipients of a person's ability to file a civil rights complaint. ICDVVA will notify staff and subrecipients that the standard full or condensed civil rights statement be prominently displayed on all publications, websites, posters, and informational material. Furthermore, a copy of this policy and complaint form are made available on its website. ICDVVA shall have on file copies of the relevant portions of its Request for Grant Proposals, subrecipient contracts, standard assurances, or other documents in which ICDVVA notifies DOJ-funded subrecipients of federal civil rights requirements.



## ICDVVA GRANTEE CIVIL RIGHTS MONITORING

- ICDVVA will ensure that subrecipients have procedures in place for responding to complaints of discrimination within their organization. ICDVVA staff conducts monitoring to ensure compliance with the contractual agreement. Said monitoring includes use of the DOJ OCR's Federal Civil Rights Compliance Checklist to ensure compliance with all applicable federal non-discrimination laws.
- ICDVVA will also ensure that subrecipients notify their staff, clients, and program participants of prohibited discrimination and the procedures for filing an employment or services discrimination complaint.
- ICDVVA will ensure that subrecipients (Executive Director or program administrator) have completed the OCR training available online at least once every three years.

ICDVVA's policies and procedures are not intended to impair or limit the rights of any individual to seek a remedy available under federal law. As an alternative, or in addition to filing a complaint with ICDVVA, DHW, or a subrecipient, an individual may file a complaint with an appropriate external federal agency.

If a complaint involves employment discrimination, the complainant may file a complaint with:

U.S. Equal Employment Opportunity Commission  
San Francisco District Office  
450 Golden Gate Avenue 5 West, P.O. Box 36025  
San Francisco, CA 94102-3661  
Phone: 800-669-4000  
TTY: 510-735-8909  
<http://www.eeoc.gov/employees/charge.cfm>

If an employment or services discrimination complaint involves a program receiving federal financial assistance from the DOJ, the complainant may also file a complaint with:

U.S. Department of Justice  
Office of Justice Programs Office for Civil Rights  
810 7th Street  
NW Washington, DC 20531  
Phone: 202-207-0690  
TTY: 202-307-2027  
<http://ojp.gov/about/ocr/complaint.htm>

### 3. Confidentiality Policy

*Adopted: December 11, 2020*

#### **Policy**

ICDVVA, along with subrecipients of grant funds administered by ICDVVA, shall, to the extent permitted by law, reasonably protect the confidentiality and privacy of persons receiving services under each grant-funded program. ICDVVA shall not disclose, reveal, or release any personally identifying information or individual information collected in connection with grant-funded services requested, utilized, or denied, regardless of whether such information has been encoded, encrypted, or otherwise protected. In no circumstances may a recipient of grant-funded services be required to provide a consent to release personally identifying information as a condition of eligibility for said services. Additionally, in no circumstances may any personally identifying information be shared in order to comply with reporting, evaluation, or data collection requirements of any program.

Neither ICDVVA nor its subrecipients may 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 for release may not be given by the abuser of a minor, the abuser of the other parent of a minor, or by an incapacitated person. If a minor or a person with a legally appointed guardian is permitted by law to receive services without their parent's or guardian's consent, the minor or person with a guardian may consent to release of information without additional consent from the parent or guardian.

If release of information is compelled by statutory or court mandate, ICDVVA and its subrecipients shall make reasonable attempts to provide notice to victims affected by the disclosure of the information, and take reasonable steps necessary to protect the privacy and safety of the persons affected by the release of the information. Nothing in this confidentiality policy prohibits compliance with legally mandated reporting of abuse or neglect.

ICDVVA and its subrecipients may share the following:

- Non-personally identifying data in the aggregate regarding services provided to clients, and non-personally identifying demographic information, in order to comply with reporting, evaluation, or data collection requirements.
- Court-generated information and law enforcement-generated information contained in secure governmental registries for protection order enforcement purposes.
- Law enforcement- and prosecution-generated information necessary for law enforcement and prosecution purposes.

If a particular federal award carries more restrictive privacy policies than this policy, ICDVVA and subrecipients of grant funds under that award shall follow the most restrictive policy.

## 4. Contracting & Procurement

*Adopted: March 6, 2020; Rev. 8/13/2021, 12/8/2023, and 12/20/24*

The Council on Domestic Violence and Victim Assistance (ICDVVA) is a state entity and must follow all contracting and procurement statutes and rules as directed by Idaho Code and the Procurement Act. ICDVVA will use Department of Health and Welfare, Contracts and Procurement Services Unit (CAPSU) processes and infrastructure for purchasing to ensure the Council meets procurement requirements.

1. The Executive Director is the Signature Authority for ICDVVA on purchases, subawards, and contracts up to \$500,000. No other ICDVVA staff are permitted to sign contracts, agreements, or MOUs on behalf of ICDVVA. However, the Program Administration Manager, in addition to the Executive Director, can sign Subgrant Request forms (SRFs) on behalf of ICDVVA.
2. Reimbursement requests may be approved by the Program Administration Manager and shall be reviewed on a periodic spot check basis by the Executive Director.
3. A representative from CAPSU has "Delegated Purchasing Authority" and will sign agreements/contracts and subawards over \$500,000.
4. Resources and Contacts:
  - a. DHW CAPSU resources for contracts and purchasing can be found on the InfoNet, under SharePoint sites.
  - b. Patrick Murphy [Patrick.murphy@dhw.idaho.gov](mailto:Patrick.murphy@dhw.idaho.gov), or his replacement if he is no longer in that position.
5. Financial Services manages other agency-wide policies that are in place for ICDVVA administrative support. ICDVVA must be informed by DHW of other applicable financial policies that may also apply to purchasing activities.
  - a. Policies and procedures for both purchasing/contracting & financial policies and control standard can be found on the InfoNet, under SharePoint sites.
  - b. Other financial support: Fiscal Help Desk [HDFscl@dhw.idaho.gov](mailto:HDFscl@dhw.idaho.gov).
6. The following are links to **mandatory Statewide Contracts** (Office supplies, Maintenance, Repair & Operations (MRO), Office furniture, and other mandatory contracts):
  - <https://purchasing.idaho.gov/>
  - <https://purchasing.idaho.gov/statewide-contracts/>.

For assistance in interpreting statewide contracts, contact Patrick Murphy.

All ICDVVA staff must take the CAPSU training within thirty (30) days of hire to learn DHW purchasing processes.

All ICDVVA staff must also take the Division of Purchasing Introduction to Purchasing class, if available, within 120 days of hire.

## 5. Disposition of Equipment Valued at Over \$2,000

*Adopted: March 5, 2021; Rev. 8/13/2021*

Equipment as defined by the Idaho Council on Domestic Violence and Victim Assistance (ICDVVA) is tangible personal property (including information technology systems) having a useful life of more than two years and valued at over \$2000.

Equipment disposition is the final settlement (i.e., sale, exchange, or transfer) of the property purchased through the contract. Equipment purchased through the contract is subject to an equitable claim by the state and the federal government.

- Equipment valued at \$2000 or less may be retained, sold, or disposed of by the subrecipient with no further obligation.
- Equipment valued at \$2000 or more is required to be disposed of per this policy.

### **Determining Equitable Claim**

The equitable claim amount is determined by establishing the percentage of monetary interest ICDVVA has in the equipment (i.e., was the piece of equipment purchased entirely by ICDVVA, or did ICDVVA provide less than 100% of the funds used to purchase the equipment?)

Approval must be obtained by ICDVVA before disposing of equipment prior to the end of the useful life of an item.

### **Methods of Equipment Disposition**

Once ICDVVA determines the percentage of monetary interest it has in the equipment, the method of allocation or return is decided.

Disposition of the equipment generally involves the subgrantee following the method below:

#### **1) Compensation for the equipment**

If the subrecipient wishes to retain the equipment for other uses, the subrecipient must compensate ICDVVA. The amount of compensation is computed by multiplying the current fair market value of the equipment by the percentage of funds ICDVVA originally put toward the purchase of the equipment. If the subrecipient has no need for the equipment, the subgrantee will obtain disposition instructions from ICDVVA.

#### **2) Sale of the equipment**

If the subrecipient chooses to sell the equipment, proper sales procedures must be established to ensure the highest possible return. The subrecipient must give

ICDVVA its share of the proceeds after deducting the cost of the sale. ICDVVA share is determined by multiplying the proceeds from the sale by the percentage of funds ICDVVA originally put toward the purchase of the equipment.

The actual cost of the sale and the associated handling charges may be deducted from the amount due ICDVVA. The net amount is submitted to ICDVVA.

### **3) Transfer of equipment**

ICDVVA reserves the right to transfer the equipment to another program or subrecipient who is eligible under the existing statutes. Transfer of equipment must be made according to appropriate ICDVVA policies.

If the subgrantee is instructed by ICDVVA to ship the equipment elsewhere, the subgrantee will be reimbursed by ICDVVA in the amount computed by multiplying the fair market value of the equipment by the percentage of funds not originally supplied by ICDVVA or charged to ICDVVA toward the purchase of the equipment, plus any reasonable shipping or interim storage costs incurred.

### **4) Return of the equipment**

After the subgrantee returns the equipment, ICDVVA will either transfer the equipment to another subgrantee or add the equipment to the ICDVVA inventory.

If adding the equipment to the ICDVVA inventory, ICDVVA transfers the equipment to the area that originally purchased the equipment or to a different region.

### **5) Determining the method of equipment disposition**

The method of disposition is determined on a case-by-case basis. The final disposition of the equipment is established as part of the contract termination procedures or at the time excess equipment is identified. Disposition is at the state's discretion and is dependent upon the value, condition, and amount of equipment and whether the equipment can be used to further service ICDVVA programs, the state, or a federal program.

When determining the method of disposition, the following questions should be considered:

- What is the cost benefit of maintaining the equipment?
- Who, if anyone, can make the best use of the equipment in serving clients?
- Does ICDVVA have a large enough claim on the equipment to require it to be entered into the ICDVVA inventory?

### **Documenting Equipment Disposition**

The subrecipient's signature authority submits notification to the contract manager of their intent to dispose of the equipment, and what ICDVVA's equitable claim is. The correspondence must contain sufficient information for the contract manager to verify the claim, which includes:

- A description of the equipment;
- The manufacturer's serial number, model number, or other identification number;
- Identification of the grant under which the subgrantee acquired the equipment;
- Acquisition dated and unit acquisition cost;
- The information needed to calculate ICDVVA's percentage of monetary interest;
- Location and condition of the equipment and the date the information was reported;
- Value of each item of equipment, including source(s) of valuation (e.g., names and addresses of bidders and amounts of bids received, and/or names and addresses of appraisers and appraisal amounts);
- All pertinent information on the final transfer, replacement, or disposition of the equipment. Information should include the option(s) ICDVVA accepts to resolve its equitable claim and means of carrying out the option(s). If the equipment is sold, information on the means used to advertise and/or accept offers and documentation of costs associated with the sale and other such data are required.

In addition to adequate documentation, the contract manager must accept and approve the notification, and maintain a copy in the contract file.

## 6. Grant Award Process

*Adopted: March 6, 2020; Rev. 8/13/2021, 6/1/22, 7/21/2023, 12/8/2023, and 3/22/24*

### **Policy**

The Idaho Council on Domestic Violence and Victim Assistance (ICDVVA) has written policy regarding subrecipient solicitation, awarding, and distribution of federal funds in Idaho Administrative Code (IDAPA 16.05.04).

### **Procedures**

1. ICDVVA issues an RFP for ICDVVA funding each year. The RFP will be reviewed annually by the Grant Manager(s), Program Administration Manager, and Executive Director to ensure compliance with VOCA final rule and FVPSA regulations.
2. The RFP must be clearly posted on the main page of the ICDVVA website. Email notification will be sent to current subrecipients. The RFP will also be posted on ICDVVA social media accounts and in the newsletter as deemed appropriate by the Executive Director.
3. Applications are due on the date specified in the RFP.
4. ICDVVA staff will file all received applications on the Shared S drive.
5. ICDVVA staff will maintain a spreadsheet by region that includes the following fields:
  - Organization Name
  - Project Point of Contact
    - Name, email, phone
  - Finance Point of Contact
    - Name, email, phone
  - Data Point of Contact
    - Name, email, phone
  - Executive Director
    - Name, email, phone
  - Board President
    - Name, email, phone
  - Amount Requested
  - Priority Categories as designated in the application
6. The Grant Manager(s) or Program Administration Manager will review the proposed budgets to ensure all proposed items are allowable, reasonable, and consistent with ICDVVA funding requirements. Items that are not will be discussed during the grant review meeting.
7. The Grant Manager(s) or Program Administration Manager will review and/or conduct an operational risk assessment to determine programmatic and fiscal risk of the applicant.
8. Upon close of the application period, ICDVVA staff will randomly assign applications from at least two (2) regions to each Council member to review and score. Council members will not score applications from their own region.



9. Council members will score the applications in accordance with the application score sheet provided by ICDVVA staff.
10. ICDVVA Grant Managers will review and score applications for their assigned regions.
11. The Executive Director will score half of the applications and the Program Administration Manager will score the other half of the applications, with each scoring some applications from each region.
12. ICDVVA staff will compile reviewer scores into a spreadsheet.
13. The Council will meet at a quarterly meeting (ideally in person) to discuss each application.
14. The Council will evaluate each application based on reviewer scores, operational risk assessments, and comments along with other regional factors such as the number and quality of applications submitted, the VOCA and FVPSA underserved population requirements, subrecipient compliance with ICDVVA requirements, distribution of funds throughout the state, and other factors delineated in the IDAPA rules or considered material by ICDVVA staff and/or the Council, based on best available data.
15. ICDVVA staff will submit recommended funding amounts to the Council at least forty-eight (48) hours before the Council meeting where grant awards are to be determined.
16. The Council will determine final funding amounts and vote to approve final awards.
17. Applicants will be notified of the award decisions and their application scores via Notice of Award letters. ICDVVA reserves the right to negotiate the final scope, amount, budget, and terms of individual subgrant awards.
18. A spreadsheet with all grant award amounts and recipients will be posted to the ICDVVA website.
19. Applicants not receiving an award will be notified via letter, which will include an explanation of denial. Unsuccessful applicants will be afforded a reasonable opportunity to appeal to the ICDVVA Council; appeals must be submitted in writing within thirty (30) days of notice of denial and must contain the basis of the appeal. In deciding any appeal, the Council must consider only the information from the applicant provided in the application and other information available to the Council during the scoring and application review/award process to determine whether there is any basis to reverse the decision made.
20. Within thirty (30) days of the notification of award, programs receive a subaward contract outlining the terms and conditions, scope of work, performance metrics, cost/billing procedure, and reporting requirements.
21. Within thirty (30) days of the notification of award, programs receive a budget form for final approval, and Department of Justice Special Conditions.
22. The signed subaward contract and ICDVVA required documents must be submitted prior to the effective commencement date.
23. Expenses paid outside of the contract period or prior to final completion of the contract and required documents will not be reimbursed.
24. The subgrantee contract will be effective for a twelve (12) month period unless amended/extended.

25. Throughout the process, during bi-weekly ICDVVA team meetings and in quarterly Council meetings, adherence will be monitored through completion of spreadsheets, reports, and notification as outlined in this procedure.
26. At the close of each grant year, the Grant Managers will track each subrecipient to verify the following:
  - The last draw has been processed and paid out
  - All reports due have been submitted to ICDVVA
  - All required match for the grant year has been met and verified.

When these requirements are satisfied, a closeout letter will be sent to the subrecipient acknowledging that all obligations have been met and that the grant has ended. It is the responsibility of the assigned Grant Manager to follow up on incomplete or missing documentation until closeout is possible.

Evaluations are made according to the following criteria:

1. Organization: applicant funding priority category, mission, and project goals and objectives;
2. Services Provided: scope of services, geographic area served, number of clients served;
3. Collaboration and Community Support: degree of cooperation with other programs to ensure services to all areas and clients without duplicating services;
4. Staff and Volunteers: recruitment efforts, use of volunteers, number of funded staff involved in direct service and administrative support, and turnover in funded positions;
5. Funding and Support: fundraising activities, knowledge of other available funding sources, increasing or decreasing reliance on ICDVVA funding, and sustainability;
6. Fiscal Management: compliance with financial policies and procedures, audit procedures and findings, budget monitoring, data collection and reporting compliance, budget narrative, and match;
7. Clients served: underserved and priority categories; and
8. Demand data: data on the demand and need for services, incidence of victimizations, and demonstrated need for additional services in a region.

## 7. Grievance Policy

Adopted: March 5, 2021; Rev. 8/13/2021 & 12/8/2023

***A grievance shall be defined as: complaint based on a circumstance regarded as just cause for protest, providing individuals a right of an internal review of a condition, decision, or treatment unsatisfactory to the individual and affecting their status. The purpose of the ICDVVA grievance procedure is to provide a system for reviewing issues. Matters of policy cannot be grieved.***

- I. External Grievance
  - a. Grievance regarding a funded program
  - b. Grievance regarding ICDVVA Staff
  - c. Grievance regarding a Council Member
  
- II. Internal Grievance (by ICDVVA)
  - a. Grievance regarding ICDVVA and a funded program
  - b. Grievance regarding Executive Director and the Council
  - c. Grievance between Council members

The Grievance Policy for ICDVVA consists of two substantive sections. One section shall provide policy and procedure for external grievances; the other section shall apply internally to govern staff and Council member grievances.

The policy and procedure for external grievances relates to situations in which ICDVVA has responsibility and/or authority. Those are issues that relate to the program's compliance with regards to contractual items, program standards, and/or program fiscal guidelines. In addition, ICDVVA needs to be advised of any investigation into a program for violation of state, municipal, or federal laws.

The external grievance policy is divided into two categories, (A) grievances from persons outside of ICDVVA about a program whom we fund, and (B) grievances from programs about ICDVVA.

### **I. EXTERNAL GRIEVANCE**

#### **A. GRIEVANCE REGARDING A PROGRAM**

##### **1. Oral grievance placed with ICDVVA staff**

From time to time, members of the public, program employees, or other individuals have telephoned or made in-person contact in order to discuss problems with a program that ICDVVA funds. ICDVVA's responsibility will be to:

- a. Listen carefully and respectfully to the problem that has caused the individual to contact us.

- b. Encourage the individual to contact the Executive Director and/or Board of the funded program to resolve the issue.
- c. Advise the individual that we will not take action on contacts or complaints that are not in writing; however, formal action will be taken upon receipt of a written grievance.

## 2. Written grievance placed with ICDVVA staff

All written grievances shall be forwarded to the members of the Council by ICDVVA staff, and to the Board Chair (and members, if known) and Executive Director of the specific funded program involved. The ICDVVA Executive Director shall evaluate the grievance to determine whether or not the grievance falls within an area that is ICDVVA responsibility and/or authority. This determination is made based on whether the grievance falls within an area covered by ICDVVA service standards, policy, contract or subaward documents, or programmatic or fiscal matters which fall within ICDVVA's monitoring responsibility relating to subrecipients.

In the event a complainant does not wish to have their written grievance submitted to the program involved due to concerns regarding confidentiality, discrimination, and/or possible retaliation, ICDVVA will, to the extent possible, keep the identity of the complainant confidential.

In the event that a determination is made by the Executive Director that the grievance is outside the responsibility and/or authority of ICDVVA, a letter shall accompany the copy of the grievance to the Board. The letter shall advise the Board that the grievance was received and that ICDVVA will not be taking action, as it is outside of the area in which ICDVVA has authority or responsibility; however, the grievance is being forwarded for their information.

In the event there is a determination by the Executive Director or the Council that the grievance falls inside the area of ICDVVA responsibility, and/or it involves a misappropriation of funds or any act of fraudulence, there shall be an unannounced monitoring and site visit of the program involved. The results of the monitoring and site visit shall be contained in a written report along with recommendations from the ICDVVA staff. If the investigation reveals misappropriation or fraudulent activity, a certified letter shall be sent to the Board of the program involved. The letter shall include the results of the investigation and shall ask for a written response within five (5) days. All information will be forwarded to the ICDVVA Council to determine consequences once a response is received. A decision will be made by the ICDVVA Council within five (5) days following an emergency meeting or other vote consistent with Council bylaws. The program shall be notified of the action to be taken immediately upon decision. Following the investigation, the responses, and determination of any action to be taken, the documents shall be submitted to the Office of Victims of Crime.

Any grievances that include issues other than misappropriation of funds or fraudulent activities, but are still within ICDVVA responsibility, as determined by the Executive Director, shall be sent to the ICDVVA Council members, the Executive Director, and at least one Board member of the program in question. The program will be asked to respond to the issues

raised in the grievance within ten (10) days. Depending on the response of the program, ICDVVA may ask for corrective action within a specified time frame, and/or suspend or terminate funding. In the event that corrective action is required, ICDVVA must receive proof the corrective action has taken place within the specific time from the funded program.

#### B. GRIEVANCE REGARDING ICDVVA STAFF

If a grievance is made about ICDVVA staff to a Council Member, said grievance shall be immediately forwarded to the Executive Director. If the grievance is made to the Executive Director, the same process shall apply.

If the complaint pertains to staff other than the Executive Director, the Executive Director shall review the complaint and determine whether action is necessary. If the issue falls within the civil rights policy, ICDVVA civil rights policy and procedure shall control. If necessary, the Executive Director shall request the employee to review and respond to the complaint, with a minimum of 24 hours allowed for any response. The Executive Director will determine the appropriate response, and whether any action is necessary, consulting with HR staff if the complaint falls within the scope of Section 9 (Respectful Workplace) of State HR policy. Notice to the complainant is at the discretion of the Executive Director.

If a complaint is regarding the ICDVVA Executive Director, the Council shall immediately forward the complaint to the Executive Director, with notice to Council members. If the grievance addresses day-to-day operations of ICDVVA, or is within the policy established by ICDVVA, the Executive Director shall respond within fifteen (15) working days to the program involved. All efforts will be made to first resolve the grievance with the complainant and the ICDVVA Executive Director. At the discretion of the ICDVVA Executive Director, attendance at the Board meeting of the program may be requested in order to address the issues. In the event that no resolution can be reached, the ICDVVA Executive Director shall notify the ICDVVA Council of the steps taken to resolve the issue. The Council may be asked to send a letter to the Board reiterating the policies and guidelines of ICDVVA.

*If the complaint addresses a policy of the Council, notice shall be provided to the Council members and the Executive Director. It shall be a general rule that matters of policy cannot be grieved. The Council or ICDVVA Executive Director will provide written receipt of the grievance and advise them that matters of policy cannot be grieved.*

If the complaint addresses a **violation of policy and/or law**, the Council member shall immediately forward the complaint to all Council members, with an emergency meeting to be scheduled within five (5) days. The Council Chair shall be responsible to notify the complainant and the Executive Director. The Executive Director shall respond to the Council. The Council Chair shall be responsible for notice to the complainant. There should be consideration given as to whether or not this is within the grievance procedure. A decision of the quorum of the Council shall be a decision of the Council.

### C. GRIEVANCE REGARDING A COUNCIL MEMBER

If a grievance is made about a Council member to the ICDVVA staff, said grievance shall be forwarded to the Executive Director, who shall report it to State HR.

## II. ICDVVA INTERNAL GRIEVANCE

- a. ICDVVA grievance regarding a funded program
- b. Grievance regarding the Executive Director and the Council
- c. Grievances between Council members

### A. ICDVVA GRIEVANCE REGARDING A FUNDED PROGRAM

In the event ICDVVA has a grievance with one of the funded programs, and the grievance is based upon contractual, programmatic, or fiscal compliance issues, and ICDVVA is unable to resolve the issues with the Executive Director of the program, a notice shall be sent to the Board Chair of the program asking for time to address the issues at a Board meeting. The ICDVVA regional Council member for that program shall also be notified and asked to attend the meeting.

If the above action does not resolve the grievance, ICDVVA may suspend or terminate funding.

### **SUSPENSION OR TERMINATION OF FUNDING (Already implemented/published in grant applications and contracts)**

The Idaho Council on Domestic Violence and Victim Assistance is accountable to federal and state funding sources.

Although the situation is rare, there are times when a program no longer meets the standards set forth by the Council or federal or state funding sources, and is not in compliance with the program, contractual or fiscal requirements, or state and federal laws. ICDVVA will act pursuant to the Idaho Administrative Procedures Act, 16, Title 05, Chapter 04.

Several sources may originate a complaint of non-compliance. These sources include but are not limited to: ICDVVA staff or designated contractor, or municipal, state, or federal authorities. Initiation of the complaint process and discretion of ICDVVA will be in accord with ICDVVA standards, state and federal funding source guidelines, and state and federal law.

In the event such a situation occurs, the following steps will be taken:

1. The subgrantee will be informed of the complaint of non-compliance or standard failure by the Executive Director of ICDVVA.

2. The Executive Director will notify the Council and the governing agency of the program of the complaint by registered mail.
3. The subgrantee will be required to respond, in writing, within twenty (20) days of the date of receipt of the letter.
4. After the subgrantee's response, the Executive Director and the Council member representing that region will attempt negotiation to remedy the complaint with the subgrantee and its governing Board. All attempts will be made to negotiate resolution.
5. If negotiation is unsuccessful, the Executive Director will notify the Council, subgrantee, and its governing Board of the decision to deem the complaint of non-compliance or standard failure with or without merit within 10 (ten) days.
6. If the decision is to find the complaint with merit, the subgrantee shall have ten (10) days to notify the Executive Director of the intent of the program to remedy the complaint or to not comply with the opportunity to remedy.
7. In the event the program notifies of intent to remedy, the Executive Director shall notify the Council, the subgrantee, and the governing Board of a schedule for compliance and notice to the subgrantee regarding what actions must be taken to remedy the non-compliance or standard failure.
8. In the event the decision by the program is to not comply with the remedy, the Executive Director shall notify the Council, the subgrantee, and their governing Board that within thirty (30) days funding will be suspended or terminated, or an adjustment, penalty, or reduction of the grant award will occur.
9. Upon resolution, the Executive Director will notify the Council, the subgrantee, and its governing Board.
10. Written materials must have proof of delivery.
11. ICDVVA will maintain all correspondence under this section in the program file. The information will be considered during future grant award processes.
12. ICDVVA reserves the right to amend these guidelines at their discretion.

B. GRIEVANCE REGARDING THE EXECUTIVE DIRECTOR AND THE COUNCIL

C. GRIEVANCES BETWEEN COUNCIL MEMBERS

**Policy:** From time to time, disagreements may arise among staff members. Our policy is to provide every employee the right to an internal review of a condition, decision, or treatment unsatisfactory to the employee and affecting his/her employment. Open communication between supervisors and employees is encouraged to maintain effective and timely resolution

of employee issues. Retaliation in any form against an employee initiating a grievance is prohibited.

The purpose of the grievance procedure is to provide a system for reviewing employment decisions or other issues questioned by employees. Matters of policy cannot be grieved.

**Procedure:**

1. **Eligibility:** All employees may appeal a decision through the established grievance procedure.

2. **Steps of the Grievance Procedure:** Prompt examination of employee issues is critical to their resolution. Therefore, strict timeframes have been established to move the grievance through a review process. A grievance not filed in conformance with the steps and timeframes outlined below may be considered withdrawn.

**Step One:** Action must be initiated by the employee within ten (10) working days of the occurrence or knowledge of said incident. An incident may be a single occurrence or a pattern of conduct.

- The employee shall state the complaint in writing noting the date of the alleged incident or duration of the pattern of conduct, facts, and the resolution sought.
- The employee should submit the written grievance to the Executive Director. In the event the grievance involves the Executive Director, the grievance should be submitted to the Chair of the Council. In the event that the grieving employee is the Executive Director, the written grievance should be submitted either to the full membership of the Council, or to the Chair of the Council exclusively.

**Step Two:** Upon receipt of the grievance, the recipient will review the matter and confirm that no satisfactory resolution was reached between the parties through earlier discussion. The recipient and the grieving employee will meet within ten (10) working days of the receipt of the grievance to discuss and review all issues. The reviewer will consider all facts presented, investigate further as necessary, and give an oral decision to the employee within five (5) working days of their meeting. In the event that the recipient is the full Council, an emergency meeting of the Council will be called to review the grievance and the decision of a quorum of the Council shall be the decision of the Council as a whole.

**Step Three:** If the employee chooses to appeal the response, the employee may, within five (5) working days of the response, request a hearing by the Chair of the Council, or the Council designee. In the event the grievance involves the Chair of the Council, a Council designee will be appointed by the Council through majority vote. The Chair of the Council or the Council designee will review all findings and investigate further as necessary. The decision of the Chair of the Council or the Council designee shall be rendered in writing to all parties within seven (7) working days of the meeting and shall be final.



Nothing in this policy is intended to limit any rights an ICDVVA employee has under State HR Policy. State HR policy, not DHW HR Policy, controls as to ICDVVA Council members and staff.

## 8. Performance Measurement and Required Data

*Adopted: December 6, 2019; Rev. 8/13/2021 12/3/2021, & 12/8/2023*

Office for Victims of Crime (OVC) requires that performance measurement data be submitted to OVC through the automated system (currently PMT) for each subrecipient of VOCA victim assistance funds on a quarterly basis. The federal quarterly due dates for the data are: November 15, February 15, May 15, and August 15. ICDVVA must submit an annual narrative report, currently by completing in PMT and downloading and then uploading into Just Grants.

FVPSA data is required to be reported annually, in December, through the federal reporting system (OLDC). Data is collected from programs by the ICDVVA Research Analyst throughout the year at regular (no more than quarterly) intervals using a method specified by the Research Analyst.

### Policy

Subrecipients are required through the ICDVVA subaward contract to submit quarterly performance measurement data. The quarterly due dates are October 15<sup>th</sup>, January 15<sup>th</sup>, April 15<sup>th</sup>, and July 15<sup>th</sup>. Failure of subrecipients to timely meet these deadlines is considered noncompliance with ICDVVA requirements and will be considered in subsequent grant application scoring. Subrecipients must track data with either:

- A subrecipient system that has been programmed to capture the VOCA and/or FVPSA required data; or
- A documented record keeping system (in Excel or otherwise) that tracks the required data.

ICDVVA's Research Analyst will review data. The report will be returned to the subrecipient data point of contact if errors are found for correction.

### Notification, Training and Compliance

1. The subrecipient agreement (contract) outlines required reports and due dates corresponding with each report. The performance measurement data reports are included in this section with due dates to ICDVVA on October 15<sup>th</sup>, January 15<sup>th</sup>, April 15<sup>th</sup>, and July 15<sup>th</sup>.
2. The Council Research Analyst or qualified staff will provide annual training prior to the start of a new subaward period to train subrecipients on how to collect data appropriately. The training will be recorded and available to programs throughout the year. During this webinar, subrecipients will receive training on:
  - i. Data definitions
  - ii. Utilizing data collection tools (Jotform, Excel, PMT, etc.)

- iii. Requirements of each data section – what is to be collected
  - iv. Due dates – when data is due to ICDVVA
3. Each funded program must designate a data contact person who will be responsible for resolving any data questions raised by ICDVVA.
  4. The Research Analyst will review subrecipient data and will communicate with the subrecipient data point of contact to correct any errors.
  5. The Research Analyst will review the performance measurement data within thirty (30) days of the end of each federal quarter and track and document the timely receipt of the reports from the subrecipient. As of January 2024, subrecipients will be required to enter VOCA, FVPSA, and State Bridge performance data directly into ICDVVA' grant management software. The Research Analyst or other Council staff member will review the data and ensure it is complete, and submit VOCA data in the PMT on behalf of subrecipients prior to the federal reporting deadline. The Executive Director or Program Administration Manager will review the documentation and sign acknowledging timely completion of federal deadlines.
  6. The Research Analyst will save the performance reports produced from the PMT system, and as part of subrecipient monitoring the Research Analyst will compare the source data with the data entered into PMT (from one or more quarters) for accuracy and make any necessary changes.
  7. The PMT data entered and the quarterly data provided to ICDVVA (FVPSA and Council specific data) will be saved by ICDVVA and may be used by the Council to assess needs throughout the state. The Research Analyst shall review the data export from the OVC PMT online system quarterly and resolve any issues noted.
  8. The Executive Director and the Research Analyst will periodically spot check source data, reported data, and data provided on SARs and applications for accuracy and resolve any anomalies or inconsistencies.
  9. The ICDVVA Executive Director completes the State narrative questions on the annual performance measurement report and uploads the annual report produced from the OVC online system under the appropriate federal award(s) in the DOJ Just Grants system. Both the Executive Director and the Program Administration Manager shall review and document their review of the annual report prior to submission.

## 9. Reimbursement Request Timing and Processing

*Adopted: December 6, 2019; Rev. 8/13/21, 12/8/23, 3/22/24, and 9/20/24*

Federal funds are reimbursable on a cash basis. This means subrecipients will be paid after costs have been incurred *and* expensed. Requests for reimbursement must be supported with proper documentation and in a format directed by ICDVVA.

Subrecipient budgets are submitted during the application phase and are finalized prior to signing ICDVVA annual subawards. Expenses charged to the subgrant must be allowable under the appropriate funding source. ICDVVA reserves discretion over final determination of allowable expenditures. Additionally, subrecipients cannot submit reimbursement requests for items not approved in the final budget, unless a subrecipient has submitted a request using the appropriate ICDVVA form that has been reviewed and approved by ICDVVA Grant Manager(s) and/or the Program Administration Manager or Executive Director.

Requests for reimbursement must be submitted within thirty (30) calendar days from the last date of the expense period. Failure to submit the request by this deadline will be viewed as a non-compliance issue and may be considered in subsequent grant application scoring. ICDVVA reserves the right to deny payment of reimbursements which are submitted late (beyond thirty calendar days).

The subrecipient shall expend funds awarded only for the purposes and activities covered by the subrecipient's final signed budget and within the guidelines of the funding source. The subrecipient adopts all responsibility for ensuring any ICDVVA funds are used in adherence to funding source guidelines and the subrecipient agrees that funding may be terminated, suspended, reduced, or requested to be paid back at any time by ICDVVA if the subrecipient fails to comply with the provisions of ICDVVA, certified assurances, or special terms and conditions contained within the subgrant.

Subrecipients must maintain accurate time/attendance records for positions budgeted in subawards. Subrecipients must also maintain written personnel policies and keep these policies updated.

### **Executive Director Compensation**

ICDVVA discourages including Executive Director salary (including hourly wages) as part of a grant application. For subrecipients where staff is limited and Executive Directors provide direct services, reimbursement may be considered and approved, but in no event will the Executive Director's salary be reimbursed at a percentage above the cap set forth in the Grant Manual for the applicable grant year. At least some portion of Executive Director time is spent on fundraising, grant applications, and other non-allowable items, regardless of the size of an organization.

## Procedure

- Subrecipients must submit reimbursement requests utilizing ICDVVA's Grant Management Software. The reimbursements requested must match the final approved budget categories and amounts.
- Accurate time/attendance records must be maintained by subrecipients for all positions budgeted under the subaward. Federal funding requires subrecipients to engage in direct timekeeping and must accurately account for their time spent working on each grant program. This includes salaried positions and any personnel (including volunteers/interns) written into the budget attributed as federal funds or match. Adequate documentation and policies must be maintained within the grant files. Special care should be taken if a position is funded from more than one source.
- Hourly employees must be paid for actual hours worked, not a percentage of the grants. Salaried employees will be paid based on the percentage of hours worked under each funding stream.

Payroll records should reflect employees' actual work performed. Any payroll records must clearly state "VOCA," "FVPSA," or "State DV," or be easily identified by cost center or code that clearly references the funding source. Salary and fringe costs must be based on actual time worked on ICDVVA grant projects.

- The following must be verifiable for each employee payroll:
  - a. Employee name
  - b. Pay period beginning and end dates
  - c. Funding source
  - d. Hours worked
  - e. Rate of pay
  - f. Fringe benefits calculation
  - g. Total pay must tie out to hours worked by funding source, rate of pay, and fringe benefits
  - h. Date paid for pay period on timesheets
  - i. Employee signature and date
  - j. Manager/supervisor signature and date
  - k. Benefits such as medical and dental insurance paid to/for employees need supporting documentation in the form of invoices showing charges to and proof of payments from subrecipient when these are applicable
  - l. Employer taxes and Worker's Compensation cost must be provided for calculations for each employee. Supporting invoices to and proof of payment from subrecipient for Worker's Compensation are required.

- The following operating expenses must be verifiable, and documentation provided within the guidelines below:
  - a. Mileage:
    - i. Mileage must be tracked by employee, not in aggregate
    - ii. Documentation demonstrating mileage must be included. Maps or odometer readings will be accepted,; however, any client or shelter addresses must be redacted
    - iii. Mileage between work and home is unallowable
  - b. Rent
    - i. A copy of the lease agreement with address and client information redacted must be included in each subrecipient file
    - ii. An invoice and proof of payment (i.e., check, credit card statement, etc.) must be included to verify total
  - c. Other expenses
    - i. Itemized invoice from vendor
    - ii. Receipt
    - iii. Check number
  - d. Travel
    - i. Unless a subrecipient has submitted a travel policy that has been reviewed and approved by ICDVVA, subrecipients will follow the State of Idaho travel policy. The following items are required:
      - 1. Travel voucher for each employee
      - 2. Receipts for all travel expenditures
      - 3. Maps for mileage
      - 4. Airline receipts
      - 5. Registration receipts
      - 6. Ground transportation receipts
      - 7. Baggage receipts
      - 8. Agenda from the conference

If meals are provided at a conference, these must be deducted from the daily per diem.
- After all expenses requested are verified by the Grant Manager, a request for payment is completed on an ICDVVA/DHW cover sheet and signed by the Grant Manager.
- The Program Administration Manager or Executive Director spot checks the reimbursement request and signs the cover sheet.
- The reimbursement request information is scanned into the DHW system (SharePoint) for payment processing.
- DHW accounting staff reviews the reimbursement request for proper coding and vendor information and populates the information in Luma.

- The Program Administration Manager or Executive Director reviews all payments for accurate coding as an approver in Luma or the applicable financial program and releases a request for payment for all reimbursements.
- The State Controller's Office issues payment to the subrecipient.
- If adjustments/revisions to the original approved budget need to be made, an ICDVVA budget adjustment request must be submitted for approval prior to making a reimbursement request.

## 10. Subgrant Award Reports (SAR)

*Approval Date: December 6, 2019; Rev. 8/13/21, 12/3/2021, and 12/8/23*

Office for Victims of Crime requires a Subgrant Award Report be submitted to OVC through the PMT automated system for each subrecipient of the VOCA victim assistance funds within ninety (90) days of the subaward's start date.

### **Policy**

Subrecipients will be required through the ICDVVA subaward contract to submit SAR data by a method specified by the Research Analyst. Subrecipients will receive training from ICDVVA on the information that will be required to be submitted in the SAR. The ICDVVA Research Analyst will ensure subrecipients timely enter SAR information related to each new grant year. Subrecipients that have not timely entered SAR data at this time will be notified in writing by the Research Analyst that the report is overdue. Failure to comply with the requirement will be considered a grant compliance issue.

#### Notification and Compliance

- The application will state that subrecipients will submit a Subgrant Award Report within 60 days of the subaward date.
- The notice of award will state in the special conditions that the subrecipient will submit the Subgrant Award Report.
- The subrecipient agreement (subaward contract) outlines required reports and due dates corresponding with each report. The SAR will be included in the report section of the agreement.
- The Research Analyst and/or the Grant Managers will provide annual training that will include a section on how to complete the SAR and due date.
- The Research Analyst will enter SARs in the PMT on behalf of subrecipients prior to the federal deadline. Subrecipients that have not completed the SAR will receive a reminder email from the Research Analyst to complete the SAR.
- The Research Analyst will review the SAR and will communicate any irregularities with subrecipients to correct the same before the federal deadline.
- A copy of the SAR report will be saved in the subrecipient's file maintained by the Council.



## 11. Single Audit Requirement Compliance

*Approval date: March 6, 2020; Rev. 8/13/21, and 9/20/24*

### **Policy**

The Idaho Council on Domestic Violence and Victim Assistance is required to review organizations expending \$1,000,000 or more in federal funds during the organization's fiscal year to monitor qualifying organizations' single audits.

The ICDVVA application will ask in the Financial section: *Does the organization expend \$1,000,000 or more in federal funds during the organization's fiscal year?* The subrecipient will also identify their fiscal year end date and audit contact information on the application.

### **Procedure**

1. The Program Administration Manager will annually use application data to determine when single audits are due from each subrecipient that expends \$1,000,000 or more in federal funds during their organization's fiscal year. The organization's fiscal year and other pertinent information will be maintained by the Grant Manager.
2. The Program Administration Manager shall maintain a spreadsheet showing which subrecipients are required to have a single audit and shall annually download copies of the audits and retain the most recent for funded programs in ICDVVA files.
3. During the course of monitoring, Grant Managers will check that the subrecipient has submitted with the Federal Audit Clearinghouse or follow up for assurance they have not met threshold. The Grant Manager will ask the CFO or equivalent officer to provide a certification that they have not met the threshold during the desk or onsite monitoring.
4. The Program Administration Manager will review audit information monthly in order to determine when the single audit reports are expected. The Program Administration Manager will track the receipt of single audit reports and make requests for these reports if they are not received by the date required.
5. Once a copy of the single audit is received, the Program Administration Manager will review the report and make a note of any audit findings and determine whether or not any management decisions (pursuant to [CFR § 200.521](#)) are required. The report will be saved to the subrecipient file and the ICDVVA single audits folder.

6. If the subrecipient has audit findings, the Program Administration Manager will send the audit findings to the Executive Director. The Program Administration Manager and Council Executive Director will follow up with the subrecipient's Executive Director to obtain copies of the subrecipient's corrective action plan and completion documents for the single audit and issue any required management decision.

## 12. Subrecipient Eligibility Verification

*Adopted: 2019; Rev. 8/13/2021 and 12/3/2021*

The Idaho Council on Domestic Violence and Victim Assistance (ICDVVA) has developed policy and procedure to ensure subrecipients receiving VOCA, FVPSA, and State DV funding meet eligibility criteria.

- 1) VOCA criteria (per [2 CFR § 94.111-94.113](#)) include:
  - a. Being operated by a public agency or nonprofit organization that provides services to victims of crime;
  - b. Demonstrating effective victim services with financial support from non-VOCA funding; and;
  - c. Using volunteers to provide crime victim services.
  
- 2) FVPSA recipients ([per 45 CFR § 1370.1](#)) must be one of the following:
  - a. A local public agency, or a nonprofit private organization (including faith-based and charitable organizations, community-based organizations, tribal organizations, and voluntary associations) that assists victims of family violence, domestic violence, or dating violence, and their dependents, and has a documented history of effective work concerning family violence, domestic violence, or dating violence; or
  - b. A partnership of 2 or more agencies or organizations that includes—
    - i. an agency or organization described in paragraph (1); and
    - ii. an agency or organization that has a demonstrated history of serving underserved populations in their communities, including providing culturally appropriate services.
  
- 3) To be eligible for State DV funds (per [I.C. § 39-5210](#)), a program must provide a safe house or refuge and a crisis line. Other services which may be provided include, but are not limited to:
  - a. Counseling;
  - b. Educational services for community awareness, for prevention of domestic violence and for the care, treatment and rehabilitation of parties to domestic violence;
  - c. Support groups;
  - d. Assistance in obtaining legal, medical, psychological, or vocational services.

During the annual award and application review period, ICDVVA staff will utilize a Funding Eligibility Checklist to review and ensure applicants are eligible to receive Council funding. Applications from ineligible applicants will not be considered for funding. The eligibility checklist for each subrecipient will be signed by the Program Administration Manager or Executive Director and filed on the ICDVVA server along with a copy of the applicant's SAM registration. Prior to amending any subaward to add VOCA or FVPSA funding beyond the initial award amount, ICDVVA staff will review the SAM registration status of the subrecipient and ensure that it remains current.

### **13. Vetting New Applicants for Grant Awards**

*Adopted: 3/22/24*

When new applicants to ICDVVA funding meet the appropriate eligibility criteria for federal and/or state funding streams, ICDVVA staff will conduct an abbreviated monitoring process to vet the following materials:

- Full agency budget
- 990s or tax returns for most recent 2 years
- Most recent audit or financial statements, if applicable
- Board list, bylaws, and Articles of Incorporation
- Proof of 501(c)(3) status, if applicable
- Copies of all policy and procedure manuals, including shelter rules and employee manuals (must include Confidentiality policy)
- Resumes and job descriptions for all staff requested to be grant-covered

Based on the evaluation of the above materials, ICDVVA staff may decide to fund the organization, or may choose instead to make recommendations to the applicant that will help them be more successful in a later grant cycle.

### **14. Subrecipient Monitoring Policy and Procedures**

*Rev. 8/13/2021, 12/3/2021 & 12/8/2023*

The Idaho Council on Domestic Violence and Victim Assistance (ICDVVA) will conduct subrecipient monitoring through desk reviews and site visits as defined in this policy. The goal of monitoring activities is to ensure services for Idaho survivors of crime are delivered with integrity and in accordance with grant regulations.

It is the responsibility of ICDVVA to monitor the performance and expenditures of subrecipients to ensure that goals and objectives are achieved, and that funds are used for authorized purposes, as well as to confirm compliance with applicable laws, regulations, and other program funding requirements. These regulations and requirements are outlined in the Notice of Award (NOA) of the federal grant and detailed in the subgrant scope of work and contract. Reviews further inform the ICDVVA staff where the subrecipients may require technical assistance to comply fully with grant requirements.

ICDVVA has the discretion to determine if the monitoring will be conducted on site or remotely ((An Enhanced Desk Review (EDR)). may be performed. EDRs are not the preferred method of compliance monitoring and should only be employed in case of extraordinary circumstance, such as a declared state of emergency or other uncontrollable circumstances as determined by ICDVVA.

### **Monitoring Standards and Procedures**

Under the following performance standards, every program funded by ICDVVA will be monitored by staff at a minimum of every two years.

Monitoring is conducted to: 1) monitor a subgrantee's compliance with state and federal rules & regulations, fiscal management, data reporting and organizational structure; 2) provide training and technical assistance; and 3) ensure that ICDVVA staff has a clear understanding of the delivery of victim services in the state and a working relationship with the service providers.

Grant Managers are responsible for completion of monitoring activities and may be assisted by additional ICDVVA personnel as needed.

At the start of each calendar year, the Grant Managers will create a proposed schedule for monitoring subrecipients. The Program Administration Manager will review the schedule to ensure compliance with monitoring requirements and forward a recommended schedule to the Executive Director for approval. At each quarterly Council meeting, the Program Administration Manager will review the monitoring schedule and progress toward completion.

### **Monitoring Intervals**

- **Monthly:** Reimbursement requests are reviewed and approved as received.
- **Quarterly:** Fiscal monitoring and match review will be conducted quarterly. Any discrepancies will be addressed with the subrecipient.
- **Every Two Years:** Programmatic monitoring, either onsite or remote.

#### **Events that may precipitate more frequent monitoring include but are not limited to:**

- Sudden change in leadership or key funded staff
- Complaints of waste, fraud, or abuse
- Complaints from clients
- Complaints from subrecipient board
- Uniformly inaccurate or sudden change in quality of reimbursement requests
- Problems with accuracy of required data reporting

#### **Standards for Programmatic Monitoring include, but are not limited to:**

- Policies and procedures governing program services, including confidentiality
- Office of Civil Rights requirements
- Current certifications and licensure as necessary
- Current Employer Liability and Workers Compensation Insurance
- Other such programmatic materials as ICDVVA staff may request
  - Review of all programmatic reporting for the review period
  - Interview with subrecipient staff

**Standards for Financial Monitoring include, but are not limited to:**

- Assessment of submitted documentation from subrecipient. Documentation includes, but is not limited to:
  - Expense Ledger
  - Personnel documentation (timesheets, payroll remittance, benefits, etc.)
  - Receipts and cancelled checks for purchases
  - Mileage logs
  - Travel receipts
  - Documentation of value of donated goods/materials/items
  - Equipment log / property records for items purchased with grant funds
  - Other such financial documentation as ICDVVA staff may request
- Review of all financial reporting for the review period
- Most recent single audit, if applicable
- Interview with subrecipient staff

**Procedures for both onsite and remote monitoring are as follows:**

- The Grant Manager will notify the subrecipient of the scheduled monitoring via email no less than thirty (30) calendar days prior to the scheduled visit. Subrecipients will receive a documents checklist and pre-review workbook with the notification.
- All requested documents and the pre-review workbook must be submitted to ICDVVA in advance of the scheduled monitoring.
- The Research Analyst will review a quarter of data reporting with the subrecipient to verify how the data was collected and the accuracy of the data reported for each ICDVVA grant source
- The Grant Manager reviews all documents and the pre-review workbook and completes a Monitoring Workbook to indicate compliance/non-compliance with monitoring criteria prior to the monitoring meeting.
- During the meeting, the Grant Manager interviews the subgrantee’s designated grant project director and any grant project staff for additional information/clarifications on monitoring documents.
- Following the meeting, the Grant Manager prepares a Monitoring Report which includes any

findings, concerns, or recommendations and due dates for specific items that require corrective action.

- The Monitoring Report is reviewed and signed by the ICDVVA Program Administration Manager. If the report contains findings, the Executive Director will also sign the report.
- The Monitoring Report is sent to the subrecipient. Reports with findings are also sent to the chair of the subrecipient's Board of Directors.
- Within fourteen (14) days, the subrecipient must sign to acknowledge receipt of the report, agree or disagree with the items included in the report, provide their corrective action plan for any findings or concerns, and return the completed and signed report to the Grant Manager.
- Satisfactory resolution of corrective active items will adhere to the following schedule:
  - All findings must be resolved with satisfactory documentation provided to ICDVVA within thirty (30) days after ICDVVA receipt of the corrective action plan.
  - All concerns must be resolved with satisfactory documentation provided to ICDVVA within six (6) months after ICDVVA receipt of the corrective action plan.
- Upon satisfactory resolution of corrective action items, the Grant Manager will draft a letter of monitoring completion for signature as follows:
  - The Program Administration Manager will sign letters of completion when no findings were included in the corrective action plan.
  - The Executive Director will sign letters of completion if findings were included in the corrective action plan.
- The Grant Manager will deliver the completion letter electronically to the subrecipient.

## 15. VOCA Match Waiver Policy & Procedure

*Adopted: March 19, 2020; Revised 8/13/2021, 12/8/2023 & 6/14/2024*

### Introduction & Background

VOCA recipients are required to provide a 20% match share of the overall requested budget (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 Program Guidelines or as otherwise outlined herein.

Effective July 01, 2019, The Office of Victims of Crime (OVC) will no longer require OVC prior approval of VOCA subrecipient full or partial match waivers. VOCA match waivers will be approved by the State Administering Agency, the Idaho Council on Domestic Violence and Victim Assistance (“Council”). Effective July 22, 2021, The VOCA Fix to Sustain the Crime Victims Fund Act of 2021 was enacted. Section 3, Waiver of Matching Requirement, provides that each state must establish and make public a policy regarding match waivers, and that beginning on the date a national emergency is declared with respect to a pandemic and ending one year after the expiration of such national emergency, match waivers shall be issued for all eligible programs to waive the VOCA match requirements in their entirety.

The Council has developed policy and procedure to be used as a guide for approving VOCA match waivers. If this policy changes, the Council will submit the revised policy to OVC within thirty (30) calendar days of the changes to this policy.

### Guidance

Determining need for a waiver typically considers factors such as:

- Availability (or lack of availability) of local resources;
- Annual budget changes;
- Past ability or inability to provide match;
- Whether the funding is for new (additional activities requiring additional match) versus continuing activities where match is already provided; and
- Extenuating circumstances such as a natural disaster, public health crisis, national emergency, or other extreme circumstance that is out of the subrecipient’s control.
- Resource constraints (e.g., employee recruitment and retention challenges or limited funding availability)
- Other events or challenges as determined by ICDVVA



ICDVVA is authorized to initiate match waivers either on an individual project, multi-project, or a blanket basis for subrecipients when the match requirements cause a direct impact on services provided to victims of crime.

ICDVVA reserves the right to issue blanket match waivers based on qualifying circumstances which include, but are not limited to, resource constraints, limited funding availability, and other related challenges as determined by ICDVVA.

**ICDVVA approval is required for any match waiver requested by a subrecipient.**

Match requirements are automatically waived for subrecipients that are federally recognized American Indian or Alaska Native tribes, or projects that operate on tribal lands. There is no need for them to submit a waiver request.

**Procedure for Requesting a Match Waiver:**

ICDVVA shall provide a match waiver form (or link to a web-based form) on its website at [www.icdv.idaho.gov](http://www.icdv.idaho.gov). Subrecipients must submit the form to ICDVVA as directed on the website.

**Criteria Used to Determine Eligibility for a Match Waiver:**

1. Is the subrecipient requesting a match waiver for a subaward which commences on or after July 1, 2021, and within one year of the end of a declared pandemic related national emergency?

If yes, the subrecipient is eligible for a waiver of all VOCA match requirements for the duration of the grant term.

2. If no, then the following criteria shall be evaluated to determine eligibility:
  - a) Is the request being made at least forty-five (45) days before the end of the subaward period? If yes, the following applies, if not, see paragraph 3 below.
  - b) Does the request specify whether it is a full/complete waiver request and if partial, specify the percentage waiver being requested and the basis therefore?
  - c) Does the request clearly explain why the waiver is reasonably necessary?
  - d) Does the request clearly indicate/describe the hardship and/or type of circumstances that will reasonably hinder the program's ability to provide the required level of match?
  - e) Does the request indicate if a match waiver is approved, whether the organization anticipates this is a one-time request, or are there extenuating circumstances that will likely require a waiver request next year?
  - f) Does the request explain how the denial of a match waiver would impact the VOCA project?

- g) Does the request advise whether the program would have to decline all or part of the grant award if a match waiver is not granted?
  - h) Does the request outline what steps the organization plans to take in order to be able to meet the match requirement in the future?
3. If paragraph 1 does not apply and the waiver request is being made less than forty-five (45) days before the end of the subaward period, the subrecipient must include in the request:
- a. At least one compelling reason that the match waiver request could not have been made earlier; and
  - b. Details regarding the amount available towards match at the time of the request and the date and means by which the fact that match could not be met first became known to the subrecipient Executive Director, Financial Officer, and Point of Contact.

**Process for Match Waiver Determination and Notice of Decision:**

Requests made pursuant to a declared national emergency as set forth in paragraph 1 of the eligibility criteria above shall be approved and signed by the Program Administration Manager or Executive Director within ten (10) business days, with a copy provided to the requesting subrecipient by ICDVVA staff within five (5) business days of approval.

Requests made pursuant to paragraph 2 of the eligibility criteria above shall be reviewed and acted upon as follows:

- 1) The Grant Manager or Program Administration Manager shall, within fourteen (14) business days of receipt of the request, review and make a recommendation of approval, denial, or partial approval (specifying percentage recommended to be waived), considering the following:
  - How is the grant currently being matched? Consider past ability to provide match. (NOTE – OVC generally expects subrecipients 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 justify a lower amount.)
  - 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)?
  - What are the practical and/or logistical obstacles to providing match (i.e., public agencies that do not engage in private fundraising and may have limitations on soliciting contributions)?
  - Has there been an increase to the VOCA funding where local funding availability has not increased to the same degree?

- 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?
  - What steps does the organization plan to take in order to be able to meet the match requirement in the future?
  - If a match waiver is approved, does the organization anticipate this is a one-time request or are there circumstances that will require a waiver request next year?
  - How would the denial of a match waiver impact the VOCA-funded project?
  - Would the program have to decline all or part of the grant award if a match waiver is not granted?
  - How has ICDVVA handled similar waiver requests during the same grant period?
- 2) The recommendation shall be provided to the Program Administration Manager and the Executive Director no later than fifteen (15) business days after receipt of the request, and shall include:
    - Program information including a brief description of the project/services provided by the applicant;
    - Justification for Approval or Denial of the waiver, including what factors from the preceding list support the recommendation; 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 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.
  - 3) The Executive Director shall review the recommendation and make a final determination as to the waiver request, including the percentage if the request is partial, within ten (10) business days after receipt of the recommendation. The Executive Director shall specify in writing any reason for deviating from the recommendation and shall sign and date the final decision.
  - 4) ICDVVA staff will notify the subrecipient of the final decision via email within five (5) business days.

Requests made pursuant to paragraph 3 of the eligibility criteria above shall be reviewed and acted upon as follows:

- 1) The Grant Manager or Program Administration Manager shall immediately provide the request to the Executive Director and discuss whether good cause exists for consideration of the request so close to the end of the grant term, taking into account the representations of the subrecipient during the grant term regarding the ability to meet match and the quarterly match reports provided. The Executive Director will determine within three (3) business days of receipt of the request whether good cause exists to consider the request, or whether the subrecipient should have reasonably known of the

inability to meet match and made a request earlier in the grant award period. If the Director determines that no good cause exists, the request shall be denied. In the event good cause is determined to exist, the request shall be reviewed on an expedited basis, using the procedures and criteria set forth above which apply to requests made more than forty-five (45) days before a grant term ends. (The times specified shall be cut in half and “business” replaced with “calendar” in order to expedite review; i.e., fourteen (14) business days for a normal request shall be seven (7) calendar days for an expedited request).

- 2) ICDVVA staff will notify the subrecipient of the final decision via email within two (2) days of the decision.

In all instances where a match waiver is approved, the Program Administration Manager will maintain copies of each approved match waiver determination in the subrecipient’s file. The Program Administration Manager will submit to OVC the match waiver spreadsheet (using the OVC template or other required method) showing all active waivers approved in a federal fiscal year no later than 120 calendar days after the federal fiscal year end.

## 16. VOCA Priority Category Funding Requirement

*Adopted: December 6, 2019, Rev. 8/13/2021 and 9/20/24*

### **Introduction & Background**

The priority categories of crime victims are the three categories for which state administering agencies must allocate a minimum of 10 percent of each year's VOCA grant per category. The categories are specified at 42 U.S.C. 10603(a)(2)(A) and include victims of sexual assault, spousal abuse, and child abuse. Additionally, ICDVVA is also required to allocate a minimum of 10 percent of each year's VOCA grant award to underserved victims of violent crime. See 28 CFR 94.104.

During the grant application period, applicants will be asked on the application to identify the funding categories applicable to the VOCA grant funding their agency is seeking and allocate the applicable percentage of services to be provided in each of the following categories in the upcoming grant year:

- Sexual Assault (SA)
- Spousal Abuse/Intimate Partner Violence (DV)
- Child Abuse (CA)
- Underserved victims of violent crime (US) as defined in the current ICDVVA Strategic Plan
- Other (victims who do not fall into one of the above categories)

Prior to the grant award decisions each application cycle, the Executive Director will determine the dollar amount which needs to be allocated to each of the priority categories (SA, DV, CA, US) to meet minimum requirements and inform the Council.

The Research Analyst will verify priority allocations made by programs annually in the Subgrant Award Report (SAR) and notify the Executive Director of any significant deviations from percentages in the corresponding grant application for resolution. The Research Analyst will determine compliance with the priority category requirements based on the completed SARs and provide a spreadsheet to ICDVVA staff indicating the categories for each program. If the scope of a subaward changes in a way that affects the priority and underserved area allocations, then the SAR allocations will be updated in the OVC Performance Measurement Tool within thirty (30) days of discovering the change.

## 17. Minimum Reimbursement Amount for State DV Funds

*Adopted 12/3/21*

### **Overview:**

Idaho Code § 39-5211(5) provides that applicants for state domestic violence project grants must:

*Require victims to reimburse the project monetarily or through volunteer efforts for services provided as they are able to do so. Minimum reimbursement may be established by the council, with a sliding scale of reimbursement based on the victim's ability to pay;*

### **Policy:**

In accordance with Idaho Code § 39-5211(5), the Council has established a **minimum reimbursement of zero** (victims will not be required to reimburse funds). This minimum is based on the following factors:

- A desire to ensure that services are available to victims in need, without regard for any ability to repay
- Consideration of the impact on trauma victims and their inability to pay in nearly all cases, as reported by programs administering these funds;
- Inability to adequately and accurately track reimbursements from victims and the additional staffing burden that places on direct service providers
- Maintaining consistency with federal grant regulations requiring domestic violence victim services to be free of charge (VOCA and FVPSA);
- Maintaining consistency with ICDVVA Service Standards;
- No historical pattern/record of requiring reimbursement pursuant to this statute