CVSSD’s monitoring process ensures grantees meet their financial, administrative, and programmatic requirements to successfully achieve their goals and implement CVSSD funded programs. Use this form to explain the governance, administrative, and compliance practices of your program. Mark the check boxes on the left for each item that applies to the program. Use the subrecipient comment box if it is necessary to say more about a particular item on the form. Refer to CVSSD’s document “CVSSD Monitoring – Required Documentation or Proof for Desk Review” for materials you are required to submit in addition to this form.

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| **1A** | **Governance (Nonprofit Board of Directors)**  Not applicable | **Subrecipient comments** | **Fund coordinator comments** | **Compliance Checkbox Checked with solid fill**  **(FC only)** |
|  | Directors devote adequate time to governing the organization (regular attendance at meetings, meetings reach quorum, participation in decision making and events, etc.). |  |  |  |
|  | Directors spend time discussing matters of financial oversight at each board meeting, including oversight of CVSSD grant funded programs. |
|  | Directors each have a copy of the current governing documents (bylaws, articles of incorporation, meeting minutes, recent IRS return). |
|  | Directors review and approve IRS 990 prior to submission. |
|  | Directors ensure organization complies with state and federal requirements (IRS Form 990, registration and annual renewal with Secretary of State, registration and annual report to Oregon DOJ Charitable Activities, payroll withholding taxes). |

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| **1B** | **Governance (Nonprofit Board of Directors)**  Not applicable | **Subrecipient comments** | **Fund coordinator comments** | **Compliance Checkbox Checked with solid fill**  **(FC only)** |
|  | Directors receive a treasurer’s report with periodic financial statements at every board meeting (income statement explaining revenue and expenses and balance sheet explaining assets and liabilities). |  |  |  |
|  | Staff are permitted to communicate with the board and attend board meetings; Directors have access to staff who can answer technical questions. |
|  | Directors are consulted on staff policy decisions. |
|  | Staff complaints regarding alleged management misconduct are taken seriously and addressed objectively. |
|  | The organization has a written conflict of interest policy that is regularly reviewed, signed by, and enforced for both paid staff and Board of Directors. |
|  | Directors complete annual performance evaluations of executive staff. |
|  | Directors comply with IRS and state standards for setting key employee compensation. |

| **2** | **Grant Funded Personnel**  <https://www.ovcttac.gov/views/TrainingMaterials/dspOnline_VATOnline.cfm> | **Subrecipient comments** | **Fund coordinator comments** | **Compliance Checkbox Checked with solid fill**  **(FC only)** |
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|  | Staff received required CVSSD training within first year of hire and before delivering services to participants |  |  |  |
|  | Staff has read applicable grant materials including project goals and objectives. Staff understands grant activity and reporting requirements. |
|  | Criminal history is checked for all staff. |
|  | Determination of suitability to interact with minors is checked for staff that may interact with participating minors. |
|  | The conflict-of-interest policy is regularly reviewed, signed by and enforced for paid staff. |
|  | If applicable, staff understands and follows VAWA confidentiality and privacy provisions and Oregon advocate/victim privilege requirements. |
|  | Staff is informed of the organization/agency’s internal grievance process and whistleblower policy. |
|  | Staff participates in collecting CVSSD common outcome measures. |

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| **3** | **Volunteers, and Interns**  Not applicable | **Subrecipient comments** | **Fund coordinator comments** | **Compliance Checkbox Checked with solid fill**  **(FC only)** |
|  | Volunteers received CVSSD training within first year of service and before delivering services to participants  <https://www.ovcttac.gov/views/TrainingMaterials/dspOnline_VATOnline.cfm> |  |  |  |
|  | Criminal history is checked for all volunteers. |
|  | Determination of suitability to interact with minors is checked for volunteers that may interact with participating minors. |
|  | Volunteers sign confidentiality agreements as a condition of their service. |
|  | The conflict-of-interest policy is regularly reviewed, signed by and enforced for volunteers. |
|  | If applicable, volunteers understand and follow federal confidentiality and privacy provisions, CVSSD state grant and Oregon advocate/victim privilege requirements. |
|  | Volunteers are informed of the organization/agency’s internal grievance process and whistleblower policy. |

| **4** | **Administrative Policies and Procedures**  <https://www.ojp.gov/funding/financialguidedoj/overview>  <https://www.doj.state.or.us/wp-content/uploads/2017/09/VOCA-Allowable-and-Unallowable-Costs-and-Services-Guiddance-04.2021.pdf> | **Subrecipient comments** | **Fund coordinator comments** | **Compliance Checkbox Checked with solid fill**  **(FC only)** |
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|  | Personnel policies and operating procedures are established, reviewed regularly, and adjusted accordingly. |  |  |  |
|  | Insurance needs are reviewed annually and adjusted accordingly. |
|  | Property and equipment acquisition, management and disposition policy complies with Section 3.7 of the DOJ Grants Financial Guide. |
|  | Procurement policy complies with Section 3.8 of the DOJ Grants Financial Guide. <https://www.doj.state.or.us/wp-content/uploads/2019/04/CVSSD_VOCA_Contract_Subaward_checklist.pdf> |
|  | Document and records retention and destruction policy complies with Section 5 of CVSSD’s grant agreements. |
|  | Travel policy complies with Section 3.9 of the DOJ Grants Financial Guide. |
|  | Follows a policy for purchases and distribution of gift cards to participants. |
|  | Releases of information are client centered, informed, and reasonable time-limited and specific |
|  | Participants are informed of the organization/agency’s grievance procedure and of CVSSD’s grievance process.  <https://www.doj.state.or.us/crime-victims/resources/cvssd-complaint-procedure/> |

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| **5A** | **Compliance with State and Federal Regulations** | **Subrecipient comments** | **Fund coordinator comments** | **Compliance Checkbox Checked with solid fill**  **(FC only)** |
|  | Complies with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 CFR Part 200 <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1> |  |  |  |
|  | Protects the confidentiality and privacy of persons receiving services except as required by law as a part of MDT processes, in response to a valid court order with a protective order, or with informed consent of the participant and/or participant’s custodian. |
|  | Does not disclose any personally identifying information or individual information collected in connection with services. Takes reasonable efforts to prevent unauthorized releases of personally identifying information or individual information. <https://www.doj.state.or.us/crime-victims/for-grantees/grant-guidance-documents/> |
|  | Follows written procedures to respond in the event of an actual or imminent breach (as defined in OMB M-17-12). Procedures require reporting actual or imminent breach of personally identifying information to a CVSSD Fund Coordinator within 24 hours after an occurrence. |
|  | Prominently displays at locations open to the public and includes on publications, websites, posters, and informational materials a notification for program participants, beneficiaries, and employees that the program does not discriminate on the basis of race, color, national origin, religion, sex, gender identify, sexual orientation, age, or disability. |
|  | Makes determinations of suitability before certain individuals, regardless of employment status, interact with participating minors. <https://www.ojp.gov/funding/explore/interact-minors> |
| **5B** | **Compliance with State and Federal Regulations**  <https://www.ojp.gov/sites/g/files/xyckuh241/files/media/document/civil_rights_compliance_checklist_may2020.pdf>  <https://www.doj.state.or.us/crime-victims/for-grantees/civil-rights-requirements/> | **Subrecipient comments** | **Fund coordinator comments** | **Compliance Checkbox Checked with solid fill**  **(FC only)** |
|  | Has completed and certifies completion of civil rights training for employees and volunteers. Civil rights training certification is current in CVSSD EGrants. |  |  |  |
|  | Collects and maintains statutorily required civil rights statistics. |
|  | Written policies are in place to notify employees and program beneficiaries of how to file complaints alleging discrimination by the organization or agency.  <https://www.ojp.gov/program/civil-rights/filing-civil-rights-complaint>  <https://www.ojp.gov/program/civil-rights-office/filing-tips> |
|  | There have been no complaints or findings of discrimination filed against the organization or agency with OJP or DOJ CVSSD. If yes, please describe: |
|  | Persons with limited English proficiency (LEP) have meaningful access to services.  <https://www.ojp.gov/program/civil-rights/limited-english-proficient-lep> |
|  | If the organization or agency segregate services on the basis an individual’s sex, then comparable services are provided. |

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| **5C** | **Compliance with State and Federal Regulations**  <https://www.ojp.gov/funding/implement/whistleblower-protections-employees-ojp-recipients> | **Subrecipient comments** | **Fund coordinator comments** | **Compliance Checkbox Checked with solid fill**  **(FC only)** |
|  | If required, an EEOP has been prepared and is on file for review.  <https://www.ojp.gov/program/civil-rights/equal-employment-opportunity-plans> |  |  |  |
|  | If required, an EEOP Utilization Report has been submitted to OJP Office of Civil Rights. Date submitted: |
|  | Employees are informed of whistleblower rights and protections including to whom disclosures must be made, what to do if they believe retaliation has occurred, and how to report wrongdoing. |
|  | Subcontractors are informed of their requirements under 41 U.S.C. §4712 that requires subcontractors to inform any employees working under a federal award of their whistleblower rights and protections. |
|  | A good faith effort is made to maintain a drug-free workplace, and measures are taken to publish a drug-free workplace statement and to establish a drug-free awareness program.  [Title 28 C.F.R. Part 83](https://www.ecfr.gov/cgi-bin/text-idx?SID=7046b488a83d85494405465fc3b0dc21&tpl=/ecfrbrowse/Title28/28cfr83_main_02.tpl) |
|  | Federally funded services are provided to eligible beneficiaries regardless of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice. |

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| **6** | **Only if applicable**  <https://www.ojp.gov/program/civil-rights/partnerships-faith-based-and-other-neighborhood-organizations>  <https://www.ojp.gov/sites/g/files/xyckuh241/files/media/document/faqs_part38.pdf> | **Subrecipient comments** | **Fund coordinator comments** | **Compliance Checkbox Checked with solid fill**  **(FC only)** |
|  | If applicable:   * Federal funds are not used to conduct inherently religious activities, such as prayer, religious instructions, or proselytization. * Explicitly religious activities are separate in either time or location from the federally funded activities. Participation in explicitly religious activities is voluntary for participants. * Appropriate notice is given to program beneficiaries that the faith-based organization or religious institution does not discriminate on the basis of religion in the delivery of services. * Appropriate notice and reasonable effort are made to find an acceptable alternative provider in close geographic proximity that offers comparable services if a program beneficiary objects to the “religious character” of the organization. |  |  |  |
|  | If applicable:   * The education program or activity has adopted grievance procedures to respond to Title IX of the Education Amendments of 1972 (28 C.F.R. Part 54) which prohibits discrimination on the basis of sex * A person coordinates compliance with the prohibitions contained in 28 C.F.R. Part 54. * Notifies applicants for admission and employment, employees, students, parents, and others that the program does not discriminate on the basis of sex in its education programs or activities. |