

Policies and Procedures for Grant Administration



ILLINOIS COALITION
AGAINST DOMESTIC VIOLENCE

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SECTION I: INTRODUCTION

These policies and procedures for grant administration shall guide the Illinois Coalition Against Domestic Violence (ICADV) subgranting application process, decision making and monitoring for all pass through funding for ICADV subrecipients. These policies have been developed by the Funding Oversight Committee, approved by the Board of Directors and approved by any source funder which requires it. These policies do not supersede current federal or state statutes which apply to the source funder that ICADV may administer and are subject to change with approval of the ICADV Funding Oversight Committee, Board of Directors, and source funder as required. A periodic review of these policies is conducted by the Funding Oversight Committee. Questions or comments may be submitted to ICADV, ilcadv@ilcadv.org or 806 S. College, Springfield, IL 62704.

SECTION II: DEFINITIONS

Notice of Funding Opportunity (NOFO): The document ICADV distributes to domestic violence agencies or other potential applicant agencies to complete to apply for pass through subgrant funding.

Proposal: The applicant agency's response to the NOFO. It is the potential applicant agency's grant application for the funded project.

ICJIA: Illinois Criminal Justice Information Authority, state agency who serves as source funder administering Victims of Crime Act (VOCA) and Violence Against Women Act STOP (VAWA) dollars.

VOCA Victims of Crime Act: The Victims of Crime Act is funded with fines paid by offenders convicted of violating federal laws, supports direct services to victims of crime. The Act requires that priority be given to services for victims of sexual assault, domestic violence, child abuse, and other groups identified by the state as underserved victims of crime. ICADV administers funds supporting services for victims of domestic violence.

VAWA STOP Violence Against Women Act Services, Training, Officers, and Prosecution: Congress first passed the Violence Against Women Act (VAWA) in 1994 and reauthorized the Act in 2000. With a reauthorization in 2005, Congress began a new initiative of the S.T.O.P. (Services * Training * Officers * Prosecutors) VAWA program by authorizing grants to states for programs that would improve the response of the criminal justice system to female victims of sexual assault and domestic violence. The program's objectives include: providing services to women who are victims of sexual assault and domestic violence; developing, implementing, and evaluating a plan for training police, prosecutors, judges, circuit clerks, probation officers, and service providers to promote an interdisciplinary approach to sexual assault and domestic violence; and implementing measures that document and assess the response of criminal justice agencies in Illinois to sexual assault and domestic violence. ICADV administers funds supporting services for victims of domestic violence.

IDHS: Illinois Department of Human Services, state agency who serves as source funder administering Illinois general revenue, fine, Title XX, and FVPSA funding.

FVPSA: Family Violence Prevention Services Act, administered by the US Department of Health and Human Services Bureau, FVPSA is the primary federal funding stream dedicated to the support of emergency shelter and related assistance for victims of domestic violence and their children.

General Revenue Funding: Funds allocated by the Illinois General Assembly to support domestic violence shelter and services for victims and their children.

Fine Funding: TBA

Title XX Funding: Title XX of the Social Security Act, also referred to as the Social Services Block Grant (SSBG), is a capped entitlement program. States are entitled to their share, according to a formula, of a nationwide funding ceiling or "cap," which is specified in statute. Block grant funds are given to States to help them achieve a wide range of social policy goals, which include preventing child abuse, increasing the availability of child care, and providing community-based care for the elderly and disabled.

Subrecipient: Eligible agency receiving pass through funding subcontract.

Subcontract: Document/contract ICADV has with subrecipient for the provision of services.

Domestic Violence Agency: A service provider that:

- Is a legally incorporated 501(c)(3) or operates within a legally incorporated 501(c)(3) organization and which has as a principal mission is to provide services to victims of domestic violence. Services consist of one or more of the following: information, crisis intervention, emergency shelter, referral, counseling, advocacy, or emotional support.
- Has a record of providing effective, victim-centered services for the past two years. Victim-centered services are those that promote empowerment and self-determination of victims and which hold abusers accountable for their behavior.
- Provides services that are free, nondiscriminatory and confidential;
- Provides all staff and volunteers with 40 hours of domestic violence training. Staff trained after July 1, 2004, must be trained by a site approved by the Illinois Certified Domestic Violence Professionals;
- Provides 24 hour telephone accessibility by personnel without requiring the victim to make a second phone call or wait for a return phone call;
- Provides access to safe housing, including access to trained staff and services to effectively meet the needs of victims;
- Has demonstrated ability to utilize an intake assessment to determine eligible clients and uses appropriate service plans for eligible clients;
- Assists victims in seeking available crime victim compensation benefits;
- Promotes coordinated public and private efforts within the local community to aid crime victims;
- Has credibility within their service community regarding provision of services to domestic violence victims.

ICADV Program Council Funding Oversight Committee: The Program Council committee of the Illinois Coalition Against Domestic Violence (ICADV) composed of Program Council member agency delegates who have applied and been accepted to fill a vacant seat on that committee. The committee shall consist of 8-12 member delegates, each representing a different Program Council member agencies. Each committee member will commit to full participation for a three year term. No more than two consecutive terms may be served. ICADV recognizes the value of regional representation, particularly in the context of fair funding decisions. As such, the Funding Oversight Committee shall strive to maintain regional balance among its members. The primary functions of the Committee are to oversee all subrecipient funding policies and procedures, initiate the funding application

process, review funding applications, make funding recommendations, and oversee the monitoring of pass through funding. This committee determines how much funding is allocated to priority service areas determined by the Program Council Services Committee

ICADV Program Council Services Committee: The Program Council committee of the Illinois Coalition Against Domestic Violence composed of Program Council member agency delegates. The primary functions of the Committee are to oversee the development of the Illinois Services Guidelines for Domestic Violence Service Providers, and identify and address emerging trends in service delivery. This committee also determines priority areas for new or significant increases in funding. This committee will oversee the work to strengthen the effectiveness of the resource development and technical assistance.

SECTION III: NEW FUNDS/PROJECTS

SETTING FUNDING PRIORITIES

If notified of new or substantial increased funding, the ICADV Services Committee shall consult with the source funder to consider the specifications of the source funds and determine how current service needs may fit within those parameters. Services Committee will make recommendations to the Program Council about how to most effectively prioritize new funds. The Funding Oversight Committee shall use those priorities in determining the application process guidelines for allocating those new funds.

GUIDING PRINCIPLES FOR FUNDING DECISIONS

ICADV's guiding principles in service delivery to those victims of domestic violence and their children include:

- Domestic violence is a crime of power and control. All persons are potential victims, but most often are women and children.
- Domestic violence negatively impacts all who experience and/or witness it; therefore, domestic violence diminishes the quality of life in the community.
- Domestic violence is unjustifiable.
- Each person has responsibility for their own behavior. Victims do not cause the abuse.
- Each person has the right to the information, support, and services necessary to become safe, self-reliant, and autonomous.
- Children from violent homes are at higher risk of becoming victims or abusers. Violent behavior is a learned response and is often passed down from generation to generation.

ICADV is committed to ensuring that victims of domestic violence and their children throughout the state of Illinois are provided the best quality services possible. ICADV is committed to ensuring this statewide coverage to the maximum extent possible with resources available by considering any and all successful applications from entities deemed eligible based on criteria set forth in these policies and in the specific notice of funding opportunity announcement.

ICADV aims to fund the most expansive network of domestic violence service providers who demonstrate a record of providing effective, victim centered services. This includes having credibility and the support of its services by the community. Victim-centered services are those that promote empowerment and self-determination of victims, and which hold abusers accountable for their behavior. Service delivery models should be based on offering information, options, encouragement, and support to victims for their independent decision-making based on their family's needs; supporting victims' efforts to regain control over and decrease the violence in their lives; and encouraging victims to follow safety plans and seek assistance as often as necessary to achieve safety. To identify the service providers best suited to provide these services, unless prohibited or otherwise directed by a source funder, ICADV shall have a three year funding cycle. Year one will be open and competitive to identify potential new service providers and give others an opportunity to expand or otherwise refine their service delivery as allowed every three years. Once funded in the competitive year, the subrecipient will receive continuation funding in years two and three in the funding cycle contingent upon the successful implementation of the funded project.

AGENCY ELIGIBILITY FOR FUNDING OPPORTUNITIES

The Funding Oversight Committee shall define the eligibility criteria for each funding opportunity based on the criteria required by the source funder, ICADV funding priorities set for specific opportunity, and other factors determined necessary and relevant to ensure the most successful delivery of services to survivors of domestic violence and their children for the specific identified purpose area.

Unless otherwise defined or required by the funding source, eligible applicants are public agencies and not for profit organizations that have a principal mission of providing domestic violence services and record of providing effective services.

As required by source funder, ICADV will require successful subrecipients to comply with all Illinois Grants Accountability and Transparency Act (GATA) requirements including, but not limited to, GATA registration, pre-qualification and approval of Internal Control Questionnaire (ICQ) and Programmatic Risk Assessment (PRA). Any specific conditions required by the subrecipient's cognizant agency, source funder, or GATA Unit, or mandated as a result of the ICQ and PRA will be incorporated into the ICADV subcontract.

ICADV will issue a Programmatic Risk Assessment as part of its funding application and funding continuation process to identify agencies with identified risk.

At the time of application subrecipients must be registered with the Illinois Secretary of State (if applicable), have a Duns and Bradstreet (DUNS) number, have an active SAM.GOV registration, not be debarred, and not be on the GATA Stop Payment list .

Subrecipients must submit a copy of staff and volunteer activity, time and effort tracking, time certification and/or timesheets for ICADV approval to ensure compliance with 2 CFR 200.430 Compensation-Personal Services Standards of Documentation of Personnel Expenses.

DEVELOPMENT OF THE NOTICE OF FUNDING OPPORTUNITY

A Notice of Funding Opportunity (NOFO) requires applicants to concisely address a specified scope of work, provide a program budget detailing personnel and equipment needs, and qualify their experience to implement the program's scope of services. Once the priority area for the funding opportunity is determined, staff completes a draft of the NOFO and submits it to the Funding Oversight Committee for revisions and approval. After approval by the Funding Oversight Committee, the NOFO is sent to the source funder for approval, if required. If the source funder requests substantive revisions, staff will consult with the Funding Oversight Committee before making the revisions and submitting the revised NOFO to the source funder. The Funding Oversight Committee authorizes staff to make editorial revisions requested by the source funder without prior approval by the Funding Oversight Committee.

CONTINUATION MATERIALS

Materials to continue projects in year two and three funded by the NOFO in year one minimally must contain a new budget and budget narrative, service and outcome objectives for that year. However, if the project scope or type of services differs significantly from the year one application, more detailed materials will be required. Continuation materials will be reviewed by ICADV staff.

ANNOUNCEMENTS FOR COMPETITIVE OPPORTUNITIES

In an effort to expand the network of domestic violence service providers who provide quality services to survivors and their children throughout Illinois ICADV shall publish all announcements for competitive funding opportunities minimally to currently funded subrecipients, to domestic violence service providers that have requested to be placed on ICADV's funding opportunities distribution list, on ICADV's website, and to other provider networks which are deemed relevant to the specific funding opportunity either by ICADV or the source funder. ICADV and the Funding Oversight Committee will allocate available resources to utilize successful applicants to maximize statewide coverage for funded services.

TECHNICAL ASSISTANCE DURING APPLICATION PROCESS

ICADV may require potential applicants to participate in a Bidder's Conferences. If offered, the Bidder's Conferences will provide potential applicant agencies with information and technical assistance to complete a proposal in response to a NOFO.

Any applicable requirements related to attendance at a Bidder's Conference will be clearly stated in the NOFO.

Technical assistance for completing the proposal will be available from ICADV staff until the published deadline for such technical assistance. Written technical assistance responses offered to one potential applicant will be published (eg Frequently Asked Questions (FAQ)) with other funding opportunity NOFO materials on the ICADV website periodically through the application period.

Potential applicants should also consider the following general helpful hints for completing a grant proposal and also refer to specific instructions/requirements set forth in the specific NOFO. A well-developed grant application includes: data and evidence that support the program scope and suggested outputs; program scope that is aligned with national, regional or local initiatives; strong and established partnerships with community groups, other not-for-profits, and local governments, detailed in the program scope and in letters of support; and complete and concise responses in every section of the application. Applicants should always refer to specific guidelines and requirements outlined in the specific NOFO.

LATE PROPOSAL, CONTINUATION MATERIALS, AND/OR REVISIONS

Proposals and/or continuation materials must be received by ICADV no later than the published date and time indicated in the NOFO or continuation packet for the specific project.

PROPOSALS AND PROPOSAL REVISIONS IN COMPETITIVE YEARS

Proposals for competitive funding opportunities will be considered late if submitted after the due date and time published in the NOFO for the specific funding opportunity and therefore not accepted.

Revisions to proposals must be submitted no later than four weeks after the revisions are requested. Due dates and times will be provided in requests for those revisions. Two weeks following the request for revisions, ICADV staff will send a courtesy email reminding agencies of the deadline. The agency, however, is responsible for meeting the deadline regardless of whether it receives the email reminder. If an agency has not submitted the

revisions to the proposal by the deadline, ICADV staff will email the agency and include information on the deadline and policies. Agencies submitting revisions up to 48 hours late will be fined \$1000. Those received in the ICADV office more than 48 hours after the deadline will not be accepted.

ACTS OF GOD – PROPOSALS/PROPOSAL REVISIONS IN COMPETITIVE YEARS

If an act of God, such as a hurricane, flood, earthquake or other natural disaster occurs, and this act of God prevents an agency from submitting its proposal materials by the deadline, the applicant domestic violence agency will be allowed to submit its materials as soon as the capability to do so has been restored or within seven (7) days of the deadline, whichever is sooner. Both the act of God and the resulting inability to submit their proposal must occur at the agency submitting the late materials.

CONTINUATION MATERIALS AND REVISIONS IN NON-COMPETITIVE YEARS

Continuation materials in non-competitive, continuation years of a funded project will be considered late if submitted after the due date and time published in the continuation materials and therefore not accepted. Two weeks following the request for continuation materials, ICADV staff will send a courtesy email reminding agencies of the deadline. The agency, however, is responsible for meeting the deadline regardless of whether it receives the email reminder. If an agency has not submitted the continuation materials by the deadline, ICADV staff will email the agency and include information on the deadline and policies. Agencies submitting continuation materials up to 48 hours late will be fined \$1000. Those received in the ICADV office more than 48 hours after the deadline will not be accepted.

Revisions to continuation materials must be submitted no longer than four weeks after the revisions are requested. Due dates and times will be provided in requests for those revisions. Two weeks following the request for revisions, ICADV staff will send a courtesy email reminding agencies of the deadline. The agency, however, is responsible for meeting the deadline regardless of whether it receives the email reminder. If an agency has not submitted the revisions to the proposal by the deadline, ICADV staff will email the agency and include information on the deadline and policies. Agencies submitting revisions up to 48 hours late will be fined \$500. Those received in the ICADV office more than 48 hours after the deadline will not be accepted.

ACTS OF GOD - CONTINUATION MATERIALS AND REVISIONS TO PROPOSALS

If an act of God, such as a hurricane, flood, earthquake or other natural disaster occurs, and this act of God prevents an agency from submitting its revision and/or continuation materials by the deadline, the domestic violence agency will be allowed to submit its materials as soon as the capability to do so has been restored or within seven (7) days of the deadline, whichever is sooner. Both the act of God and the resulting inability to submit their revisions and/or continuation materials must occur at the agency submitting the late materials. Agencies that are late in their *sub*mission due to an act of God are not subject to the fine.

UNSATISFACTORY REVISIONS

Agencies will be encouraged to contact ICADV staff for technical assistance in completing revisions to proposals and/or continuation materials. Unsatisfactory revisions may result in a recommendation by the ICADV Funding Oversight Committee to the ICADV Board of Directors to deny or reduce funding of the proposal.

MERIT BASED REVIEW OF COMPETITIVE PROPOSALS

PROPOSAL REVIEW TEAMS

A team of proposal reviewers will be composed of ICADV staff, Funding Oversight Committee members, and independent reviewers not affiliated (non-affiliated reviewer) with ICADV or an ICADV member agency. A non-affiliated reader is an individual not currently employed in the domestic violence community but who has familiarity of the issue of domestic violence.

A minimum of three reviewers will review each proposal. At least one of these reviewers shall be a non-affiliated reviewer. At least one of these reviewers shall be a Funding Oversight Committee member. The third reviewer will be any of the parties listed as possible team members above.

One non-affiliated reviewer will be recruited as a back-up reviewer in the event a non-affiliated reviewer's scores are disallowed. This reviewer will be informed that they will have a shorter time frame in which to complete the review and scoring process.

REVIEWER CONFLICT OF INTEREST AND CONFIDENTIALITY

All proposal reviewers must complete and return to ICADV a Confidentiality Agreement and Conflict of Interest Disclosure form disclosing any current or potential conflicts of interest regarding agency proposals they may be potentially assigned to review. If conflicts are identified, proposals shall be reassigned to a different reviewer. A sample merit based review conflict of interest and confidentiality form is provided in Appendix E.

REVIEWER ORIENTATION

In addition to the proposals the reviewers will be scoring, reviewers will be given a copy of the NOFO instructions that was sent to applicants. This will include a listing of the scoring criteria and point assignments attached to each section. Reviewers will also be provided with a score sheet for each proposal for completion

Reviewers will be given scoring guidelines to maximize uniformity in the scoring process. Reviewers will participate in an orientation session covering proposal application process, requirements of the funding opportunity, and scoring guidelines.

SCORING OF PROPOSALS/APPLICATIONS

Once it has been determined no conflicts are present, reviewers will be provided copies of application materials for assigned proposals, instructions and score sheets for completion. After being given time to review applications, reviewers may discuss with other team members their concerns, questions, or may be required to participate in discussion calls with their review team, but specific final scores should not be shared among reviewers. Each reviewer will be assigned a code for identification of their review process and then complete a score for each proposal assigned to their team. Score sheets will be collected and compiled by ICADV staff. ICADV staff will average the scores for each application from each of three reviewers to determine the final score of each application. Averaged scores are then shared with the Funding Oversight Committee, along with other primary notes of concern identified by the reviewers. After final scoring is completed, proposals will fall into one of the following categories:

- a. 90-100 points: Successful applicant agency, may be asked to provide clarification or make minor adjustments as needed.
- b. 80-89 points: Successful applicant agency, contingent upon revisions requested by reviewers.
- c. 79 and below: Unsuccessful applicant agency, shall not be funded.

INCOMPLETE REVIEW PANEL SCORE SHEETS

Failure of a reviewer to submit score sheets for each reviewed proposal or other circumstances identified may result in scores of that reviewer being disallowed. If scores are disallowed, the Funding Oversight Committee will determine whether it is necessary to re-panel some or all of the proposals from that reviewer to another reviewer.

FUNDING ALLOCATION DECISIONS

Once any and all successful proposals have been identified, the Funding Oversight Committee shall make allocation recommendations based on proposal budgets submitted, total funds available, methods for maximizing statewide coverage for victim services, demonstrated need, and other factors assessed through the scoring process for the specific Notice of Funding Opportunity which ensure the most equitable allocation as possible. Funding decisions may be contingent upon revised proposal materials or other follow up information gathering about the agency or proposed project.

When funds available exceed total funds requested, all successful proposals will be funded.

When total funds requested in successful proposals exceed total funds available, the Funding Oversight Committee will make allocation decisions based on the following priorities.

- Maximize statewide coverage of funded services by funding the most expansive network of service providers who submitted successful proposals.
- Ensure preference is given to any special population or other factor specifically published in the applicable Notice of Funding Opportunity.
- If there is a substantial variance between funds requested in successful proposals and total funds available, the Funding Oversight Committee will assess the scope of that variance.
 - If based on the project proposed, total available funds will support all fundable applications at a reduced level that will still support successful projects, reduced amounts may be awarded to all successful applicants.
 - If based on the project proposed, total available funds will not support all fundable applications at a level that will ensure a successful project, proposal scores will be factored into allocation decisions (along with coverage and population factors) and reduced amounts may be awarded to funded applicants.

Once the Funding Oversight Committee has made its allocation recommendations, they will be forwarded to the ICADV Board of Directors for approval. Funding recommendations approved by the Board of Directors will be forwarded to the source funder for approval, as required.

DEBRIEFING PROCESS FOR UNSUCCESSFUL APPLICANTS

Unsuccessful applicants may request a debriefing. A debriefing is written feedback that can assist applicants in developing improved applications for future funding. A debriefing may include strengths and weaknesses of an application in terms of the evaluation and review criteria. Debriefings are not a part of the Appeals Process. Requests for debriefings must be made in writing and submitted within seven calendar days after receipt of a Funding Opportunity Declination Letter from ICADV. Debriefing requests will not be granted if there is an active appeal, administrative action, or court proceeding. The written debriefing request shall include at a minimum the following:

- The name and address of the requesting party.
- Identification of grant program.
- Instructions for a debriefing process will be specified in each NOFO.

APPEALS PROCESS

Unsuccessful applicants may request reconsideration of that funding decision. Only the evaluation process is subject to appeal. Evaluation scores and funding determinations may not be contested and will not be considered by the ICADV Funding Oversight Committee. The appeal must be in writing and submitted within fourteen (14) calendar days after either the date the grant award notice is published or receipt of a Funding Opportunity Declination Letter from ICADV, whichever comes first. The written appeal must include at a minimum the following:

- Statement indicating a request for a formal appeal.
- The name and address of the appealing party.
- Identification of the grant program.
- A statement of reason for the appeal.

ICADV's Ethics and Appeal Officer will lead the information gathering process related to an appeal. More specific instructions for all funding decision reconsideration requests are specified in Section VI.

APPLICANT NOTIFICATIONS

Applicant agencies will be notified in writing via e-mail of the status of their proposals (funded or not funded and any clarifications or revisions necessary).

Agencies scoring 90 points or below will also receive any list of strengths and weaknesses noted by the readers. For any proposal scoring over 90 points, the agency must specifically request the notes.

REVISIONS TO APPLICATIONS

Revisions for proposals scoring 80-89 will be reviewed and approved accordingly by staff. If necessary, staff will consult with one of the original reviewers of that proposal.

AMENDMENTS AND/OR BUDGET REVISIONS ONCE AWARD IS MADE

Once an initial project budget is approved by ICADV, adjustments may be made at any point throughout the project period, up until six weeks prior to the end of the subcontract, with approval from ICADV. If a subrecipient determines that a budget revision is necessary, they may submit a budget revision using the ICADV Line Item Transfer Form which provides the current approved budget, changes to the budget, requested revised budget, and narrative describing the changes and calculations for the budget figures. ICADV will respond to the budget revision request within 30 days. Subrecipients should not obligate any grant dollars prior to receiving approval on requested item. Items obligated prior to ICADV approval shall not be allowed.

If the subrecipient wishes to change the scope of the project funded, minimally proposed changes in service delivery and service objectives should be submitted in writing. A completed Line Item Transfer request form also should be submitted if a budget revision is also being requested.

Other amendments to the subcontract will be executed according to terms specified in the subcontract, including but not limited to signed copies of such amendment.

SECTION III: ALLOCATION OF SUBCONTRACTS ANNUAL TIMELINE

See Appendix A: Grant Administration Timeline.

SECTION IV: MONITORING OF SUBRECIPIENTS

GENERAL MONITORING POLICY

Subrecipients will be monitored on an ongoing basis, as provided in the contracts between ICADV and source funder(s). In addition to routine review of statistical accomplishments and fiscal compliance, ICADV completes annual site visits and reports for a percentage of the funded projects as agreed between ICADV and source funders.

Specific monitoring will be conducted to ensure the subrecipient grant funds are used for authorized purposes, in compliance with all applicable Federal and State statutes and regulations, Federal and source funder financial guidelines, the terms and conditions of the subcontract and that the subgrantee performance goals are achieved.

Monitoring will ensure subrecipients' general civil rights compliance including but not limited to confirmation of Compliance Certification, verification of completed Civil Rights Questionnaire, and training of subrecipient staff on civil rights compliance.

Monitoring will extend to verification that subcontractors used by subrecipients are able to receive funding. Verification will be established by ICADV prior to a subrecipient executing a subcontract with the subcontractor.

RISK ASSESSMENT OF SUBRECIPIENTS.

Prior to executing subcontracts and throughout the funded project, ICADV will assess risk in several areas including general agency administration, audit findings, financial stability, overall fiscal assessment, and programmatic stability. These risks are assessed through formal risk assessment forms as required by source funder and through other information gathering at application and throughout the funding cycle through other communications with the subrecipient. If risks are identified, ICADV may implement additional specific award conditions for the subrecipient.

Additional specific award conditions may include items such as withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance, requiring additional detailed financial reports, additional project monitoring, requiring the subgrantee to obtain technical or management assistance, or establishing additional prior approvals.

ON SITE MONITORING (SITE VISITS)

The ICADV monitoring staff will utilize the Program On Site Monitoring Risk Criteria to determine which subrecipients shall receive a site visit during that fiscal year. The criteria include newness of the grant to the agency, newness or change in key personnel, accuracy of fiscal reports, and a variety of other factors identified during the risk assessment process. See Appendix B: Program On Site Monitoring Risk Criteria. In addition, the monitoring staff may consider other factors which could indicate that an agency would benefit from technical assistance.

In conducting the site visit, the monitoring staff will utilize the Site Visit Check List Tools to evaluate a subrecipient's projects during a site visit. The tools assess the agency's compliance with ICADV Assurances; Administration, Fiscal Documentation, Personnel, Confidentiality, Safety Procedures, Service Documentation, Program Performance and Civil Rights Compliance. See Appendix C: ICADV Site Visit Check List Tools -

Site visits will help monitoring staff identify how well a subrecipient is complying with the Illinois Domestic Violence Services Guidelines Manual, meeting approved service delivery objectives, and adhering to other state and federal guidelines requirements of the funding source. Review of materials and interviews with staff during a site visit will guide the monitoring staff in the completion of the site visit tool.

Monitoring staff will conduct an exit interview with the director of the subrecipient at the conclusion of the site visit. Final reports on the outcome of the site visit shall be submitted to the subrecipient in the form of a final site visit report within four weeks of the conclusion of the on-site visit. If subsequent information gathering after a site visit in order to complete a final monitoring report, the final report will be submitted to the subrecipient within four weeks after the final information has been provided by the subrecipient.

CORRECTIVE ACTION PLANS

Programmatic and/or financial deficiencies identified by ICADV may result in a corrective action plan. If such deficiencies are identified at a site visit, those issues shall be discussed with the director at the conclusion of the site visit, shall be identified on the site visit tool, summarized in the written report for the visit and a corrective action plan will be required when key criteria are lacking. If such deficiencies are identified through other means of monitoring, those issues will be summarized in writing and a corrective action with timeline for implementation will be agreed upon between ICADV and the subrecipient. ICADV monitoring staff will report to the Funding Oversight Committee when corrective action plans are required, technical assistance needs are identified, and/or on completion of corrective action plans. The Funding Oversight Committee will report on actionable items to the Program Council as needed.

Subrecipients that receive a corrective action plan will be required to implement that plan in accordance with a timeline for the completion of those steps agreed upon between ICADV and the subrecipient. Failure to complete the corrective action steps will result in a follow-up contacts from ICADV monitoring staff for explanation and revised plan to complete. If the second deadline is passed, ICADV monitoring staff will conduct an on-site technical assistance visit and complete a site visit report addendum noting agency non-compliance. In addition the agency will be placed on the following year's site visit list and the Funding Oversight Committee will be informed and will provide guidance on next steps.

If upon review of measures already taken in implementing a corrective action plan, offers of and the provision of technical assistance, and the outcome at the subrecipient level it is determined that there is little or no evidence of attempts at follow up improvement in the areas identified with deficiencies, ICADV will consider other additional contractual special considerations to remedy the noncompliance issue. If determined that noncompliance cannot be remedied by imposing additional specific conditions on the subcontract, ICADV may take one of the following possible actions for noncompliance with state and federal statutes, regulations, or terms and conditions of the subcontract:

- (a) Temporarily withhold cash payments pending correction of the deficiency by the subrecipient.
- (b) Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.
- (c) Wholly or partly suspend or terminate the subcontract.
- (d) Recommend to source funder there be an initiation of suspension or debarment proceedings as authorized under 2 CFR part 180.

- (e) Withhold further funded projects from the subrecipient.
- (f) Take other remedies that may be legally available.

The recommendation to take these or other action may be made by the ICADV Funding Oversight Committee, then to the ICADV Board of Directors. The ICADV Board of Directors will notify the source funder if any action is taken.

NONCOMPLIANCE RESULTING IN SUSPENSION OF FUNDS

A suspension of funds is defined as the temporary suspension of payments on an active agreement between a Subrecipient and ICADV. The Funding Oversight Committee may determine a suspension of funds is necessary should ICADV become aware of any of the following scenarios:

1. failure of the subrecipient to pay worker's compensation, unemployment taxes, or other taxes and/or fees required by law;
2. failure of the Board or staff of the subrecipient to exercise due diligence with respect to documented misuse of funds by the subrecipient's Board or staff;
3. loss of the subrecipient's 501(c)(3) status;
4. failure of the subrecipient to meet ICADV assurances/agreements, VOCA eligibility requirements, or other contractual requirements; or
5. other activity, including illegal or unethical acts, serious enough to warrant further investigation.

Subrecipient shall be notified immediately in writing of any suspension of funds. In the event of a suspension of funds, the agency may immediately cease all ICADV funded activities, if they so choose. If the investigation results in the Funding Oversight Committee voting to terminate funding to that subprovider, the Funding Oversight Committee will make a recommendation to the *ICADV Board of Directors for the final decision who will then notify the source funder. *The ICADV Executive Committee is authorized by the ICADV Board to represent the ICADV Board when a timely response is necessary.

In its quarterly reporting to ICJIA, ICADV will provide the number of agencies with corrective actions, the number completing their corrective action plans, and a summary of the service, administrative or fiscal concerns leading to the corrective actions. Additional information may be provided upon request.

NONCOMPLIANCE RESULTING IN EARLY TERMINATION OF SUBCONTRACT

If based on any monitoring activities or other information provided to ICADV staff, there are grave concerns about the continued funding of a specific subrecipient due to compliance with federal or state statutes or regulations, fiduciary, legal or other issues, staff may bring a recommendation to the Funding Oversight Committee to consider early termination of a subrecipient's contract if all corrective action plan measures have been executed. In addition if there are concerns around misuse/abuse of grant funds, fraud or other similar circumstances, early termination of a subrecipient's contract. Based upon review of materials submitted by staff, the recommendation to terminate funding for a project will be made by the ICADV Funding Oversight Committee and approved by the ICADV *Board of Directors. ICADV Board of Directors will notify the source funder. The unfunded agency will be notified of the decision to terminate funding in accordance to the terms set forth in the executed subcontract. *The ICADV Executive Committee is authorized by the ICADV Board to represent the ICADV Board when a timely response is necessary.

DESK AUDITS

Subrecipients not subject to an on-site monitoring visit, will be subject to at least one desk audit in the fiscal year. Desk audits will include the submission of back up documentation such as receipts, payroll documents, timesheets, and other supporting materials for grant and related match expenses for a specific reporting period. Other information reviewed may also include progress on addressing identified risks from ICQs, fiscal policies and following interviews with fiscal personnel.

SUBRECIPIENT REPORTING

Subrecipients will be notified of due dates for fiscal reports, statistical reports, audits, and other required materials at the beginning of the fiscal year. Subrecipients will be notified of due dates for each subcontract in correspondence which accompanies each subcontract.

FISCAL REPORT REVIEW

Monthly fiscal reports will be due from subrecipients to ICADV summarizing expenditures charged to the funded project. Timely receipt of subrecipients' fiscal reports is required. Payments shall not be dispersed by ICADV until fiscal reports are received, reviewed, and approved. Reports are reviewed to ensure subrecipients are adhering to approved budgets, that match funds are identified as required, and other required information is provided accurately.

PROGRAMMATIC REPORT REVIEW

Subrecipients may be subject to periodic data and/or programmatic reporting. This reporting requirement is stated in the subcontract. Programmatic report review includes a comparison to projected measurable objectives for the funded project to assess the progress made throughout the year. Additionally, a review is made to ensure that services provided are within the allowable, approved scope of project for the funded project. Follow up technical assistance is provided as needed if areas of need are identified.

For domestic violence service providers, the use of InfoNet data collection system for quarterly data reporting is required for reporting of client and service data.

LATE REPORTS

If a subrecipient submits three or more fiscal reports or two or more statistical data reports for a specific project after their respective due dates in any one fiscal year, the subrecipient will be required to implement specific corrective action plan. See Corrective Action Plans section earlier in this section.

AUDITS

ICADV requires that each subrecipient adhere to all audit standards as required by state and federal auditing standards which apply to source fund. This will be a requirement of any entity prior to receiving funding for the first time from ICADV or for entities receiving continuation funding. This includes audits which are required by 2 CFR 200 Subpart F. It is the responsibility of the subrecipient to obtain this audit.

Upon the completion of the audit the subrecipient will submit the report to ICADV in accordance to the terms outlined in the subcontract. Upon review, deficiencies, internal control weaknesses or other findings identified will

be used in ICADV's monitoring procedures for subrecipients. If findings are issued in the audit report are material to the ICADV funded subcontract, ICADV will issue a management decision related to the audit findings as required by 2 CFR Part 200.521 as related to federal subawards. In addition, ICADV may provide technical assistance and/or corrective action plan to the subrecipient to ensure the deficiencies areas are adequately addressed. The subrecipient must initiate and proceed with corrective action as rapidly as possible and corrective action should begin no later than upon receipt of the audit report.

ICADV may consider the results of the subrecipient's audits, on-site reviews, or other monitoring indications that necessitate adjustments to its own records and monitoring policy in accordance with 2 CFR 200.331(g).

Annual audits required as described in the Audit section of these policies shall be reviewed and evaluated using the Audit Review Checklist in Appendix XXX as a guide.

CLOSEOUT

Subrecipients must meet closeout requirements as specified in the subcontract. All closeouts must be completed and submitted to ICADV by the subrecipient within 23 days of the end date of the subcontract.

SECTION V: NOTIFICATION

The ICADV Board of Directors will give subrecipients written notification, sent via email and mail method which provides proof of delivery, of decisions to suspend or terminate funding. The ICADV Board of Directors will give applicants written notification of decisions to deny funding of grant proposals. The ICADV Board of Directors will also inform the subrecipient/applicant of the right to a debriefing process and/or appeals process as outlined in the previous section.

SECTION VI: RECONSIDERATION POLICY

If a subrecipient or applicant domestic violence agency requests reconsideration of an ICADV funding decision, the following procedures are to be followed:

1. The domestic violence agency shall submit a written statement within fourteen (14) calendar days after either the date the funding decision notice is published or received, whichever comes first. The written appeal must include, at a minimum:
 - a. Statement indicating a request for a formal appeal.
 - b. Name and address of the appealing party.
 - c. Identification of the grant program.
 - d. A statement of reason for the appeal.
 - e. Any other relevant information.
2. The Funding Oversight Committee shall respond with a decision in writing within seven calendar days following the receipt of the request and may include a request for a meeting to discuss the matter with the applicant domestic violence agency. Response of the Funding Oversight Committee shall include reasons why funding was denied, reduced, terminated, or restored.
3. If the domestic violence agency is not satisfied with the Funding Oversight Committee's response, the domestic violence agency may submit its request to the ICADV Board of Directors* no later than seven calendar days after the receipt of the Funding Oversight Committee's response.
4. The ICADV Board of Directors* shall respond with a decision in writing no later than seven calendar days after the request is received. The decision reached by the ICADV Board of Directors* shall be final. Response of the ICADV Board of Directors* shall include reasons why funding was denied, reduced, terminated, or restored.
5. If the domestic violence agency is not satisfied with the ICADV Board of Directors'* response, the domestic violence agency may submit, in writing, with a copy being sent to the ICADV Board of Directors*, the domestic violence agency's request to the source funder within seven calendar days of the receipt of the ICADV Board of Directors'* response. The decision of the ICADV Board of Directors* stands firm until the source funder communicates its decision on the request to the domestic violence agency and to ICADV.
6. Funds in dispute shall not be reallocated by ICADV [or source funder] until the reconsideration process is concluded.
7. This reconsideration policy will be included in all funding opportunity materials as well as final communications related to funding decisions.

*The ICADV Executive Committee is authorized by the ICADV Board to represent the ICADV Board when a timely response is necessary.

SECTION VII. RECORD RETENTION

ICADV shall retain all grant files and supporting documentation according to its internal fiscal policies or for a minimum of three years after the date on the closeout notification, whichever retention period is longer. All records retained shall be accessible to the source funder, any auditors and/or federal or state officials. Subrecipients shall also be required to maintain files for a minimum of three years. Specific record retention requirements shall be stated in the subcontract for the funded project.

APPENDIX A: GRANT ADMINISTRATION TIMELINE

APPENDIX B: SAMPLE PROGRAM MONITORING CRITERIA

ILLINOIS COALITION AGAINST DOMESTIC VIOLENCE ~ PROGRAM ON SITE MONITORING RISK CRITERIA

RISK CATEGORY	REASON	RISK ASSESSMENT
General Risk: Newness of grant to grantee organization	Inexperience on the part of the grantee with new regulations and/or requirements may lead to errors	Site visit required → Organization has at least one grant that it has never had before and has had the grant for less than two years. 3→ Organization has had its grant(s) for three to five years. 1→ Organization has had its grant(s) for six years or more.
Administrative Risk: Newness of administrative personnel at grantee organization	Individuals who do not have grant administration experience or who are new to their organization could be more apt to make errors in the use of grant funds and implementing a DV program	5 → Executive director or dv program director is new (one year or less). 4-2 → Executive director or dv program director have some experience running a dv program 1 → Executive director or dv program director have been with the Agency for 4 years or more
Fiscal Risk: Amount of funds designated	The larger the grant(s) amount, the greater the risk of inappropriate or unallowable use of funds	Funded Project Allocation Totals 5 → Top 91-100% allocated 4 → 70-90% allocated 3→ 30-69% allocated 2 → 10-29% allocated 1 → 1-9% allocated
Programmatic Risk: Major changes in program	Personnel turnover and/or significant shifts in objectives are often precursors to more significant problems	5 → Key staff turnover frequently, and/or numerous program/budget adjustments requested 4-2 → Some key program staff turnover or program/budget adjustments 1 → No changes in key program staff or requests for adjustments
Fiscal Risk: History of accuracy of fiscal reports	Grantees with difficulty completing the fiscal reports may not be keeping the appropriate documentation to calculate and/or support the figures entered on the reports	5 → Grantee appears to have difficulty in completing fiscal activity report 4-2 → Grantee shows some difficulty (i.e., errors in calculations) in completing fiscal activity report 1 → Fiscal reports are generally completed accurately

<p>Programmatic Risk: Results of previous programmatic site visits</p>	<p>Issues found during monitor site visits may require further follow-up to ensure that the situation has been corrected.</p>	<p>Site visit required → Agency was unsuccessful in executing a corrective action plan or was untimely in doing so. Agency has difficulty meeting ICADV Assurances. Agency has not had a site visit in the previous two years. 5-4- → Funded projects who successfully completed recent corrective action plans or corrective action plans are currently being implemented. 3-2 → No correction action plan required but areas of suggested improvement were identified. 1 → No corrective action plans, no areas of improvement were identified.</p>
<p>General Risk: Rating of Proposal</p>	<p>Grant proposal revealed weaknesses.</p>	<p>Site visit required → Proposal required with substantial revisions 80-85 pts.</p>
<p>Audit Assessment: Results of independent audit reports, if applicable</p>	<p>Grantees with findings should be followed up on to ensure the situation has been corrected rather than continuing to exist</p>	<p>5 → Most recent independent audit did not meet compliance requirements of 2 CFR 200 Subpart F, or significant material findings are in the most recent audit. 4-3 → Some material findings in most recent audit 2 → Some immaterial findings in most recent audit 1 → Most recent audit had no material or immaterial findings</p>

A minimum of 50% of funded programs/organizations will be visited annually unless otherwise required by source funder. Priority will be given to agencies where site visit is required, followed by those with highest scores.

APPENDIX C: SAMPLE ICADV SITE VISIT CHECK LIST TOOL

Agency:	Fiscal Year: 2018
Monitoring Staff:	Site Visit Date:
Staff Interviewed at Visit:	
Agency Grants:	
ICADV Assurance Met?	

ICADV Assurances	YES	NO	Field Notes
The domestic violence program has provided ICDVP certified 40 hour training to direct service staff /volunteers hired after July 1, 2004.			
The domestic violence program utilizes volunteers.			
The domestic violence program assists victims in seeking crime victim compensation benefits.			

ICADV Site Visit Monitoring Tool

The domestic violence program promotes coordinated public/private efforts with community to assist survivors.			
The domestic violence program provides 24 hour telephone accessibility by 40 hour trained staff/volunteers without survivor having to make a 2nd phone call or wait for a return phone call.			
The domestic violence program provides access to safe housing for victims of domestic violence including access to trained staff.			
The domestic violence program acts on behalf of individual survivors with other social services/criminal justice agencies (as requested by survivors).			
The domestic violence program provides ongoing training and education to community groups.			

Administration	YES	NO	Field Notes
The domestic violence program is operating under board approved policies. Indicate the last time policies were reviewed by the agency Board of Directors:			
<ul style="list-style-type: none"> Personnel Policies 			
<ul style="list-style-type: none"> Client Confidentiality/Appeal 			
<ul style="list-style-type: none"> Safety and Security 			
<ul style="list-style-type: none"> Fiscal 			

<p>The domestic violence program has submitted a Civil Rights Compliance Certification</p>			
	<ul style="list-style-type: none"> No findings in the past three years 		
	<ul style="list-style-type: none"> Findings of discrimination in the past three years 		
<p>The domestic violence program has policies that address:</p> <p>Criminal Convictions</p> <ul style="list-style-type: none"> The Grantee certifies that neither it nor any officer, director, partner or other managerial agent of Grantee has been convicted of a felony under the Sarbanes-Oxley Act of 2002, nor a Class 3 or Class 2 felony under Illinois Securities Law of 1953, or that at least five (5) years have passed since the date of the conviction. 			
<p>The domestic violence program has policies that address:</p> <p>Mandatory Criminal Disclosures</p> <ul style="list-style-type: none"> The Grantee shall continue to disclose to Grantor (ICADV) all violations of criminal law involving fraud, bribery or gratuity violations potentially affecting VOCA award. 			
<p>The domestic violence program has policies that address:</p> <p>Crimes of Dishonesty</p> <ul style="list-style-type: none"> Grantee certifies that its own and its sub-grantees' and its sub-contractors' board members, executive officers, directors, administrators, supervisors, managers and financial officers and anyone holding such a position of 			

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authority have not been convicted of theft, fraud, or any other crime involving dishonesty within the past ten (10) years.			
The domestic violence program is in compliance with policies and procedures as required in the Services Guidelines Manual (see separate tool for list of required policies and procedures).			
The domestic violence program is addressing (if any), internal specific conditions from cognizant agency. (ICQ)			
The domestic violence program is in compliance with (if any) specific conditions identified in FY18 VOCA Programmatic Risk Assessment.			
Domestic Violence Program Board of Directors			
The domestic violence program Board of Directors does not consist of anyone who may have a conflict of interest:			
<ul style="list-style-type: none"> Board members sign a conflict of interest statement. 			
<ul style="list-style-type: none"> Board of Director's list provided. 			
<ul style="list-style-type: none"> Minutes from the last three (3) Board of Director's meetings have been provided. 			

Fiscal	YES	NO	Field Notes
The domestic violence program has provided fiscal documentation that indicates the program is segregating dollars by funding source and project.			
The fiscal documentation submitted by the domestic violence program displays the			

ICADV Site Visit Monitoring Tool

required match funds and is segregated by project (VOCA only).			
ICADV has a copy of the domestic violence program's annual audit.			
The domestic violence program is tracking supervisory time to reflect:			
<ul style="list-style-type: none"> • Date 			
<ul style="list-style-type: none"> • Supervisor 			
<ul style="list-style-type: none"> • Supervisee 			
<ul style="list-style-type: none"> • Length of supervision 			
The domestic violence program is tracking relocation/transportation dollars to reflect:			
<ul style="list-style-type: none"> • Client ID 			
<ul style="list-style-type: none"> • Dollar Amount 			
<ul style="list-style-type: none"> • Type of Relocation Assistance (item, what it is) 			
<ul style="list-style-type: none"> • Purpose 			
<ul style="list-style-type: none"> • Date 			
Domestic Violence Program Consultant Therapy Services			
<ul style="list-style-type: none"> • Therapist's resume 			
<ul style="list-style-type: none"> • Rate of Pay Certification 			
<ul style="list-style-type: none"> • Documentation of other therapists' fees in same county (if subcontracting) 			

	<ul style="list-style-type: none"> • Memorandum of Understanding 			
	Domestic Violence Program Consultant Interpreter Services			
	<ul style="list-style-type: none"> • Certification for Deaf and/or Hard of Hearing Interpretation on file with the domestic violence program. 			
	<ul style="list-style-type: none"> • Rate of interpretation does not exceed allowable amount 			
	<ul style="list-style-type: none"> • The domestic violence program is tracking: <ul style="list-style-type: none"> ▪ Client ID 			
	<ul style="list-style-type: none"> ▪ Dollar amount for interpretation 			
	<ul style="list-style-type: none"> ▪ Name of Interpretation Service 			
	Procurement Policy (2015 DOJ Grants Financial Guide)			
	The domestic violence program maintains written standards for procurement.			
	The domestic violence program maintains written records that include:			
	<ul style="list-style-type: none"> • Rationale for procurement; 			
	<ul style="list-style-type: none"> • Selection of contract type; 			
	<ul style="list-style-type: none"> • Contractor selection/rejection process; 			
	<ul style="list-style-type: none"> • Basis for contract prices; 			
	<ul style="list-style-type: none"> • Have a documented process for organizational conflict of interest with potential contractors; 			
	<ul style="list-style-type: none"> • Have a process in place to ensure contracts are not awarded to 			

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	<p>contractors or individuals on the List of Parties Excluded from the Federal Procurement and Non-Procurement Programs (when applicable); and/or</p>			
	<ul style="list-style-type: none"> • Perform a System for Award Management (SAM) review of potential contractors or individuals (when applicable). 			

Time & Effort Documentation		YES	NO	Field Notes
Timesheets				
Multiple Funding Sources:				
	<ul style="list-style-type: none"> Hours reflect an after the fact distribution of actual activity, not budgeted time; 			
	<ul style="list-style-type: none"> Hours account for total activity; 			
	<ul style="list-style-type: none"> Hours are tied to specific funding sources; 			
	<ul style="list-style-type: none"> Includes time in and time out; 			
	<ul style="list-style-type: none"> Signed by employee; 			
	<ul style="list-style-type: none"> Signed by supervisory official with firsthand knowledge of the work performed; and 			
	<ul style="list-style-type: none"> Prepared monthly and coincides with one or more pay periods; 			
Time Certification				
The domestic violence program has submitted Time Certification reports for FY18 VOCA on a quarterly basis.				
	<ul style="list-style-type: none"> The reports reflect the total number of hours dedicated to FY18 VOCA/the total number of hours compensated. 			
Note: the number of hours will not necessarily coincide with InfoNet reports.				
Single Funding Sources				
	<ul style="list-style-type: none"> The domestic violence program has provided certification that all work is fundable by single grant source; 			
	<ul style="list-style-type: none"> The certification is signed by the employee; and 			

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	<ul style="list-style-type: none"> • Certification is approved by supervisory official with firsthand knowledge of the work performed. 			
The domestic violence program payroll, demonstrates VOCA/VAWA funded staff were employed by the agency during the time period under site review.				
Consultants (Sub-Contractors)				
	All subcontractor agreements are on file (includes subcontract, amount, and budgets for each subcontractor).			
	Agency has a process for monitoring subcontractor performance, expenditures and reporting.			

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Personnel Files		YES	NO	Field Notes
VOCA/VAWA Supported Staff & Volunteers				
	<ul style="list-style-type: none"> Files are kept on each employee; 			
	<ul style="list-style-type: none"> Job descriptions for each DV position are on file; 			
	<ul style="list-style-type: none"> Application for employment is on file; 			
	<ul style="list-style-type: none"> Background checks are on file (any staff or volunteer working with children must have both a DCFS CANTS and criminal background check); 			
	<ul style="list-style-type: none"> 40 hour documentation on file from an ICDVP certified cite; 			
	<ul style="list-style-type: none"> Volunteer files contain background checks/40 hour certificates; and 			
	<ul style="list-style-type: none"> Signed confidentiality agreements for staff/volunteers are in personnel file. 			
The domestic violence program’s hiring procedures are competitive.				
Staff/volunteers are aware they are legally responsible and liable for maintaining client confidentiality.				
Sanctions are defined for noncompliance by staff/volunteers.				

Confidentiality	YES	NO	Field Notes
Staff/volunteers are required to keep identities and communications of client confidential.			

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<p>Staff are to obtain a signed, written release of information that includes:</p> <ul style="list-style-type: none"> • Specified agency/individual; • Specific purpose for release; • Specific set of materials to be released; • Identified expiration date with best practices being 30 days or less unless exception is warranted (staff are encouraged to document exceptions); • Signature by client (phone when necessary); and • Signature by staff. 			
<p>Clients are aware that the identity and communications of other clients is to remain confidential.</p>			
<p>Adult clients are informed of their rights to confidential communications and the agency policy.</p>			
<p>Adult clients' signed confidentiality agreements are placed in the client files.</p>			
<p>Confidentiality agreements contain disclaimers explaining what would force the agency to break confidentiality.</p>			
<p>Client files are kept locked at all times or specified times of the day.</p>			
<p>Domestic violence program has policy outlining staff access to client files.</p>			

Safety & Security	YES	NO	Field Notes
The entrances to the domestic violence program are secure and persons are screened			

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before entering the program location (as appropriate).			
The procedures for answering the door and phone are included in the domestic violence program policies.			
The procedures for responding to batterers or abusive persons who telephone or come to shelter or program location are included in the domestic violence program policies.			
The domestic violence program has written emergency procedures in place.			
The staff/volunteers of the domestic violence program are informed of the need for security and are required to follow the written procedures.			
The clients of the domestic violence program are informed of the need for security and are required to follow the written procedures.			
The domestic violence program provides free, nondiscriminatory, confidential services to all survivors of domestic violence:			
<ul style="list-style-type: none"> • Clients are able to access services in a voluntary manner; 			
<ul style="list-style-type: none"> • Clients living with mental illness or struggling with substance abuse are able to access services; 			
<ul style="list-style-type: none"> • Clients are not subject to criminal background checks as a prerequisite to use of services; and 			
<ul style="list-style-type: none"> • Male victims of domestic violence are able to access the agency's 24-hour shelter and/or are provided 24-hour access in a comparable manner. 			

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<ul style="list-style-type: none"> The domestic violence program documents reason for emergency shelter stay beyond 45 days. 			
<ul style="list-style-type: none"> If client is ineligible, "Notice of Ineligibility" and reason(s), and right of fair hearing were given. 			

InfoNet		YES	NO	Field Notes
	The staff of the domestic violence program has the most current version of the InfoNet service definitions (2011).			
	The staff of the domestic violence program has been trained on the current version of the InfoNet service definitions.			
	The staff, supervisors, and directors of the domestic violence program routinely monitor progress on service goals and objectives and/or for other uses in the agency like case management and staff supervision.			
	The domestic violence program uses Exception Reports and/or other methods to routinely monitor accuracy of data entry.			
	The domestic violence program Turn Away List (if applicable for review month) reflects reason emergency shelter was denied to a survivor.			

PROGRAM REVIEW

Agency:	Program:
Monitoring Staff:	Site Visit Date:

	YES	NO	Field Notes
<ul style="list-style-type: none"> Number of clients served for reporting quarter is consistent with InfoNet reports. 			
<ul style="list-style-type: none"> Agency utilizes a self-monitoring management evaluations system which reviews client files. 			
<ul style="list-style-type: none"> Agency provides ongoing training opportunities for staff. 			
<ul style="list-style-type: none"> Agency reports (time certification, fiscal, InfoNet, administrative) have been submitted on a timely basis this fiscal year. 			
<ul style="list-style-type: none"> Agency reports (time certification, fiscal, InfoNet, administrative) are accurate upon submission. 			
<ul style="list-style-type: none"> Agency is on target for meeting service objectives. 			
<ul style="list-style-type: none"> Agency is on target to spend all grant funds by the end of the grant period. 			
<ul style="list-style-type: none"> Agency has corrected issues identified in previous site visit reports. 			

Agency:	Program:
Client #:	Site Visit Date:

	YES	NO	Field Notes
INTAKE			
a) Eligibility determined.			
b) Intake dated.			
c) Intake form completed within 24 hours of intake.			
d) Intake signed by client and worker.			
RELEASE OF INFORMATION			
Release(s) are in client file.			
Client ID is present.			
Release is dated.			
Release is signed by client.			
Indicates specified person/agency to whom disclosure is to be made.			
Indicate specified purpose for disclosure.			
Indicates specified materials to be released.			
Includes client's right to inspect written information to be disclosed.			

	Includes consequences of refusal to disclose, if any.			
	Includes expiration date.			
	Includes revocation information.			
	Was information released without consent?			
DOCUMENTATION OF SERVICE				
	IDVA services are documented.			
	Length of services are apparent.			
	Contacts are dated.			
	Service contacts are initialed by service provider.			
	Staff accurately document work in appropriate categories.			
	File is set up to flow from staff to staff.			
	Information critical to what is done/needs to be done is indicated.			
	Client service plans are present and regularly updated.			
	Service plans and client services can be linked to show objectives were met and/or progressing as planned.			
	Referrals for services reflect goals listed in service plans.			
	Relocation/Interpretation linked to service plan.			

APPENDIX D: SAMPLE ICADV SITE VISIT REPORT

Illinois Coalition Against Domestic Violence Site Visit Report	
Agency: _____	For Fiscal Year: FY18
Monitor Submitting Report: _____	Site Visit Date: _____
Staff Interviewed At Visit: _____	
ICADV Assurances Met? YES NO	
Recommendations:	
Corrective Action:	
AGENCY UPDATE	
REPORTS ATTACHED	
Victims of Crime Act (VOCA): _____	
Violence Against Women Act (VAWA):	
<ul style="list-style-type: none"> • VAWA Rural: _____ • VAWA Latina: _____ • VAWA Chemical Dependency: _____ 	

Information About the Site Visit Report

Performance expectations that are considered at the site review:

- ❖ *Does the staff demonstrate knowledge and expertise? Are they trained?*
- ❖ *Is your project making sufficient progress toward its goals & objectives?*
- ❖ *Do you regularly monitor the project? Are adjustments made to your activities in order to reach your objectives?*
- ❖ *Is your project providing a sufficient scope and level of services? Is it reaching the target population?*
- ❖ *Does your dv program provide systems advocacy, education, and training to increase the effectiveness of your individual advocacy for clients?*
- ❖ *How do you respond to internal & external changes and new challenges?*
- ❖ **ANY SPECIAL ACCOMPLISHMENTS?**

Illinois Coalition Against Domestic Violence

Site Visit Report

Agency:

For Fiscal Year: FY18

REPORT FOR GRANT:

Victims of Crime Act (VOCA): _____

Violence Against Women Act (VAWA):

- VAWA Rural: _____
- VAWA Latina: _____
- VAWA Chemical Dependency: _____

A. AGENCY SITE VISIT REPORT SUMMARY

Recommendations

Corrective Actions

B. AGENCY PROGRESS SUMMARY

C. SERVICE DOCUMENTATION / CONFIDENTIALITY

Client Files Contain:

- _____ Completed Intakes
- _____ Appropriate releases of information and signatures
- _____ Service hours are documented and dated
- _____ Narrative shows interventions and case progressions
- _____ Staff signatures
- _____

Data:

_____ Agency generates statistical reports

_____ Uses statistical reports to monitor progress on project

D. FISCAL INFORMATION

_____ Grants are segregated by funding source (by funder and by project)

_____ Match funds account is segregated.

_____ Fiscal reports are consistently submitted in a timely manner.

APPENDIX E: SAMPLE ICADV DESK AUDIT TOOL

Agency:	Fiscal Year: 2018		
Monitoring Staff:	Desk Audit Date:		
Staff Submitting Materials for Desk Audit:			
Agency Grants:			
Fiscal	YES	NO	Field Notes
The domestic violence program has provided fiscal documentation that indicates the program is segregating dollars by funding source.			
The fiscal documentation submitted by the domestic violence program displays the required match funds and is segregated by funding source.			
The domestic violence program has submitted a written explanation of how the agency accounts for payroll expenses in their accounting system.			
The domestic violence program has variances less than 6% over/under the projected expenses.			
<ul style="list-style-type: none"> • Explanation provided for variances greater than 6% over/under the projected expenses. 			
The domestic violence program has submitted a copy of all invoices and/or approval back up for any expenses paid in part, in whole or as matched by the agency's VOCA/VAWA awards.			
The domestic violence program has provided a written explanation of how the agency calculates volunteer hours or in-kind donations for match dollars under the VOCA award.			
The domestic violence program is tracking supervisory time to reflect:			
<ul style="list-style-type: none"> • Date 			
<ul style="list-style-type: none"> • Supervisor 			
<ul style="list-style-type: none"> • Supervisee 			
<ul style="list-style-type: none"> • Length of supervision 			
The domestic violence program is tracking relocation/transportation dollars to reflect:			
<ul style="list-style-type: none"> • Client ID 			
<ul style="list-style-type: none"> • Dollar Amount 			
<ul style="list-style-type: none"> • Type of Relocation Assistance (item, what it is) 			

	• Purpose			
	• Date			
Domestic Violence Program Consultant Therapy Services				
	• Therapist's resume			
	• Rate of Pay Certification			
	• Documentation of other therapists' fees in same county (if subcontracting)			
	• Memorandum of Understanding			
Domestic Violence Program Consultant Interpreter Services				
	• Certification for Deaf and/or Hard of Hearing Interpretation on file with the domestic violence program.			
	• Rate of interpretation does not exceed allowable amount			
	• The domestic violence program is tracking:			
	▪ Client ID			
	▪ Dollar amount for interpretation			
	▪ Name of Interpretation Service			
Procurement Policy (2015 DOJ Grants Financial Guide)				
The domestic violence program maintains written standards for procurement.				
The domestic violence program maintains written records that include:				
	• Rationale for procurement;			
	• Selection of contract type;			
	• Contractor selection/rejection process;			
	• Basis for contract prices;			
	• Have a documented process for organizational conflict of interest with potential contractors;			
	• Have a process in place to ensure contracts are not awarded to contractors or individuals on the List of Parties Excluded from the Federal Procurement and Non-Procurement Programs (when applicable); and/or			
	• Perform a System for Award Management (SAM) review of potential contractors or individuals (when applicable).			
Time & Effort Documentation		YES	NO	Field Notes
Timesheets				
Multiple Funding Sources:				
	• Hours reflect an after the fact distribution of actual activity, not budgeted time;			
	• Hours account for total activity;			

	<ul style="list-style-type: none"> Hours are tied to specific funding sources; 			
	<ul style="list-style-type: none"> Includes time in and time out; 			
	<ul style="list-style-type: none"> Signed by employee; 			
	<ul style="list-style-type: none"> Signed by supervisory official with firsthand knowledge of the work performed; 			
	<ul style="list-style-type: none"> Prepared monthly and coincides with one or more pay periods; and when applicable 			
	<ul style="list-style-type: none"> Volunteers listed as in-kind Match under the VOCA award complete Personal Activity Reports and/or timesheets which reflect the standards for timesheets above. 			
Time Certification				
The domestic violence program has submitted Time Certification reports for FY18 VOCA on a quarterly basis.				
	<ul style="list-style-type: none"> The reports reflect the total number of hours dedicated to FY18 VOCA/the total number of hours compensated. <p>Note: the number of hours will not necessarily coincide with InfoNet reports.</p>			
Single Funding Sources				
	<ul style="list-style-type: none"> The domestic violence program has provided certification that all work is fundable by single grant source; 			
	<ul style="list-style-type: none"> The certification is signed by the employee; and 			
	<ul style="list-style-type: none"> Certification is approved by supervisory official with firsthand knowledge of the work performed. 			
The domestic violence program payroll, demonstrates VOCA/VAWA funded staff were employed by the agency during the time period under site review.				
Administration: Related to Fiscal Documentation/Policies				
The domestic violence program is addressing (if any) any internal specific conditions from cognizant agency. (ICQ)				
The domestic violence program is in compliance with (if any) specific conditions identified in FY18 VOCA Programmatic Risk Assessment.				
The domestic violence program has had a change in fiscal personnel during FY18. If yes, provide name(s) of fiscal personnel.				
The domestic violence program has policies that address:				
Criminal Convictions				
	<ul style="list-style-type: none"> The Grantee certifies that neither it nor any officer, director, partner or other managerial agent of Grantee has been convicted of a felony under the Sarbanes-Oxley Act of 2002, nor a Class 3 or Class 2 felony under Illinois 			

<p>Securities Law of 1953, or that at least five (5) years have passed since the date of conviction.</p>			
<p>The domestic violence program has policies that address: Mandatory Criminal Disclosures</p> <ul style="list-style-type: none"> The Grantee shall continue to disclose to Grantor (ICADV) all violations of criminal law involving fraud, bribery or gratuity violations potentially affecting the VOCA award. 			
<p>The domestic violence program has policies that address: Crimes of Dishonesty</p> <ul style="list-style-type: none"> Grantee certifies that its own and its sub-grantees' and its sub-contractors' board members, executive officers, directors, administrators, supervisors, managers and financial officers and anyone holding such a position of authority have not been convicted of theft, fraud, or any other crime involving dishonesty within the past ten (10) years. 			

APPENDIX F: SAMPLE MERIT BASED REVIEW CONFLICT OF INTEREST CONFIDENTIALITY FORM

Merit Based Review

CONFIDENTIALITY AGREEMENT AND CONFLICT OF INTEREST DISCLOSURE Re: Proposal Review of GRANT NAME
Notice of Funding Opportunity Applications

I, the undersigned, as a member of the proposal review committee will perform subject matter expertise grant evaluation for the benefit of the Illinois Coalition Against Domestic Violence (ICADV) in compliance with relevant law, rule, policy and directive, including but not limited to 18 U.S.C. 208, GATA 30 ILCS 708/35, 708/40, and 708/60 and 2 CFR 200, 5 CFR, and the specific CFR regulations that govern the program. I understand that this applies to me whether I am a full or part-time employee, contractor, volunteer or intern.

Proposal review committee members must not have any conflicts of interest or apparent conflicts of interest with grant applicants or grant applications they evaluate.

Proposal review committee members must not participate in any review of applications concerning an immediate family member, partner, or household member; an organization in which they are serving as an officer, director, trustee, partner, or employee; or any person or organization with whom they are negotiating or who has an arrangement concerning prospective employment, has a financial interest, or for other reasons can have less than an unbiased transaction with the review committee member.

Proposal review committee members must avoid any action which might result in, or create the appearance of, using their position as a reviewer for private gain; giving preferential treatment to any proposed project under review; losing impartiality; making an official decision outside official channels; or adversely affecting the confidence of the public in the integrity of the government, the proposed project or program, or ICADV's review process.

See Attachment A for conflict of interest examples and Attachment B for a list of entities.

I certify that neither I, nor any relative or household member has a material, personal, financial or fiduciary interest that would affect my participation in this project, and that I shall avoid conflicts of interest, and the appearance of a conflict of interest, at all times.

I understand that my participation in this project will involve my knowledge of subject matter information and may involve proprietary information of applicant(s) that is not publicly known. I will not disclose any information gained during the course of my service on this project, or thereafter, except to ICADV employees who may in the normal course of ICADV business have a need for such information, until such information becomes of public record. If confidential information is disclosed, orally or otherwise, whether intentionally or unintentionally, I will notify the proposal review contact in writing of the disclosure as soon as possible.

I understand that my written comments submitted during the evaluation process may be provided by ICADV to grant applicants upon completion of the review process for the limited purpose of debriefing applicants. No personally identifying information will be disclosed to grant applicants.

I will keep all materials related to this grant evaluation confidential and in secure locations and follow ICADV instructions for return and disposal of evaluation documents.

If I become aware of any situation that conflicts with any of the representations above, or that might indicate a conflict of interest or create the appearance of a conflict of interest or other impropriety, I will immediately notify the proposal review contact in writing with a description of the conflict or impropriety.

Illinois Coalition Against Domestic Violence
Andrea Wilson, Chief Training and Technical Assistance Officer/Proposal Review Contact
806 South College Street, Springfield, IL 62707
wilson@ilcadv.org
(217) 789-2830

I have read and I understand the requirements for confidentiality and conflict of interest disclosure set forth herein and acknowledge that I am bound by these requirements for the evaluation of GRANT NAME.

Signature _____ Date _____

Name (print) _____

Title (print) _____

Agency / Entity _____

List the applicants with which you have a conflict of interest:

Attachment A

Awardee organizations must disclose in writing any potential conflict of interest to the Illinois Coalition Against Domestic Violence in accordance with 2 CFR 200.112, *Conflict of Interest*. Proposal reviewers and advisors, including members of review committees, must render impartial, technically sound, and objective assistance and advice to protect the integrity of the proposal evaluation and award selection process.

Examples of situations which may be prohibited or represent a potential conflict of interest may include, but are not limited to:

- (1) Financial interest, including ownership of stocks and bonds, in a firm which submits, or is expected to submit, an application in response to the funding opportunity;
- (2) Outstanding financial commitments to any applicant or potential applicant;
- (3) Employment in any capacity, even if otherwise permissible, by any applicant or potential applicant;
- (4) Employment within the last 12 months by any applicant or potential applicant;
- (5) Any non-vested pension or reemployment rights, or interest in profit sharing or stock bonus plan, arising out of the previous employment by an applicant or potential applicant;
- (6) Employment of any member of the immediate family by any applicant or potential applicant;
- (7) Positions of trust that may include employment, past or present, as an officer, director, trustee, general partner, agent, attorney, consultant, or contractor;
- (8) A close personal relationship that may include a spouse, dependent child or member of the proposal reviewer's household that may compromise or impair the fairness and impartiality of the proposal evaluator or advisor and grants officer during the proposal evaluation and award selection process, and the management of an award;
- (9) Negotiation of outside employment with any applicant or potential applicant;
- (10) Direct involvement by the reviewer in a proposed project or program, or in a project or program that is closely associated with the proposed project or program, or collaboration between the reviewer and the applicant on work related to the application within the past 12 months; and

- (11) Solicitation or acceptance of any gifts, gratuities, favors or anything of monetary value from applicants.

Each review committee member must immediately disclose in writing to the proposal review contact that an actual or potential conflict of interest exists as soon as it becomes known. The proposal review contact must obtain the assistance of ICADV's Ethics and Appeal Officer in order to reach an opinion or resolution. A record of the disposition of all conflict of interest situations must be included in the award file.

Attachment B – Applicant List

1.	2.
3.	4.
5.	6.
7.	8.
9.	10.
11.	12.
13.	14.
15.	16.
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59.	60.
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75.	76.
77.	78.
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81.	82.
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97.	98.
99.	100.
101.	102.

APPENDIX G: AUDIT REVIEW CHECKLIST

ICADV AUDIT REVIEW CHECKLIST

Subrecipient Name _____

Fiscal Year End _____

Date Audit Received _____

- 1 Subrecipient/Member Agencies send in Audited Financial Statements
They are due 30 days after audit is completed or 180 days after end of FY (if under single audit threshold) within 9 months (if over single audit threshold)

 - 2 After Financials are received we review them and look for :

Material Weakness	_____	YES	_____	NO
Significant Deficiencies	_____	YES	_____	NO
Reportable Conditions other than segregation of duties	_____	YES	_____	NO
Reportable conditions - segregation of duties	_____	YES	_____	NO
Legal Letters	_____	YES	_____	NO

 - 3 On the Schedule of Expenditures of Federal Awards check for:
CFDA # are required if over \$750,000 in federal dollars
Check for ICADV Pass-through (grant) numbers

	_____	YES	_____	NO
--	-------	-----	-------	----

 - 4 Check ICADV grants to see if amounts & grant numbers are recorded correctly

	_____	YES	_____	NO
--	-------	-----	-------	----

 - 5 Does the audit state they are 501c3 status

	_____	YES	_____	NO
--	-------	-----	-------	----

 - 6 Make sure match funds are shown either in a supplemental schedule or in the Audit Notes
(match should be recorded somewhere in the financials)

	_____	YES	_____	NO
--	-------	-----	-------	----

 - 7 Do Program Audit Compilation spreadsheet to record funding sources to the programs

	_____	YES	_____	NO
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 - 8 Ready to figure the dues (membership determination only - not for subrecipient status). We have a minimum of \$500 and a maximum of \$2500

	_____	YES	_____	NO
--	-------	-----	-------	----
- Use the audit compilation sheet to figures the dues
We allow members to pay in full, quarterly or monthly.

9 If we do not receive the information we need or find discrepancies a letter is sent to the Executive Director requesting clarification with a deadline.

Letter sent _____ YES _____ NO

Response Received _____ YES _____ NO

Response adequate
NOTES:

COMPLETED BY / DATE