**File 11 VA Monitoring of Subawards**

In 2018 DCJS increased our oversight and monitoring of VOCA funded projects. For example, we hired a full-time Fiscal Monitor and added two additional sub-grant programmatic monitoring positions. As described in the DCJS Grant Monitoring Policy, grant monitors conduct monitoring activities, including on-site monitoring visits and desk reviews of sub-grantees with the level and frequency based on the results of annual risk assessments. The goals of these activities are to ensure that sub-grantees:

* Carry out program activities as stipulated in the grant solicitation, grant application, and Statement of Grant Award (SOGA);
* Have adequate internal controls to protect federal funds;
* Claim reimbursements for costs that are allowable, reasonable, allocable, and necessary under program guidelines;
* Identify any conflicts of interests that exist; and,
* Maintain reported supporting documentation/records for future auditing purposes.

Monitoring activities include desk reviews, risk assessments, on-site visits, review of programmatic and financial reports, and the provision of technical assistance. In 2018, Staff conducted 48 site visits and 115 risk assessments. In addition, staff reviewed over 1200 program performance or financial reports and responded to thousands of requests for technical assistance. As stated in the DCJS monitoring policy, it is the goal that sub-grantees receive a site visit every two years. Based on completed risk assessments and the monitoring plan, in the coming year, we anticipate 70 site visits. Many of these visits will involve the review of multiple awards and will help us in accomplishing the goal a sub-grantees receiving a site visit every two years.

Additionally, DCJS updated its policies and procedures on March 5, 2019. The new policy is consistent with the VOCA Rule and the Federal Financial Guide for the awarding and monitoring of grants. Grant Monitors and the Grants Administration Staff are responsible for monitoring the activities of sub-grantees to ensure that awards are used for authorized purposes and in compliance with 2 C.F.R. §§ 200.303 and 200.331, and other federal statutes, regulations, and the terms and conditions of the awards. The DCJS VOCA grant solicitation, subsequent application and statement of grant award (SOGA) contain all of the required information listed in 2 C.F.R. § 200.331 (a).

DCJS has hired an additional Grant Monitor, a Grants Compliance Supervisor and a new VOCA Fiscal Technician. We have revised our risk assessment tool. A risk assessment is completed by the Grant Monitor before the grant award period begins and/or annually to inform the monitoring plan for the following fiscal year. Grant Monitors will complete a risk assessment using the Grant Monitoring Risk Assessment Tool which meets the required elements in 2 CFR 200.331 (b), to evaluate each sub-grantee’s risk of noncompliance with federal statutes, regulations, and the terms and conditions of the award to determine the appropriate level and schedule of sub-grantee monitoring.

At the beginning of each state fiscal year, grant monitors will develop a monitoring plan for each sub-grantee based on the sub-grantee’s assessed risk level. If issues arise that cause the sub-grantee’s risk level to be reclassified, the Grant Monitor will modify the monitoring plan to reflect the new risk level and to ensure proper accountability and compliance with program requirements and achievement of performance goals. The grant monitor will use the Sub-grantee Monitoring Tool for site-visits. Regardless of the assessed level of risk, certain monitoring activities will be performed on all sub-grantees. Based on the assessed level of risk, additional monitoring activities will be performed.

DCJS meets the VOCA Victim Assistance Final Rule (§ 94.106(b)) requirement that SAAs conduct regular desk monitoring of all sub-recipients by conducting quarterly reviews of all project performance reports and financial reports. In addition, DCJS is aware that SAAs are to conduct on-site monitoring of all subrecipients at least once every two years during the award period, unless a different frequency, based on risk assessment, is set out in the monitoring plan. We are currently testing a monitoring plan which requires on-site monitoring every one to two years, based on risk. Based on current risk scores, we estimate site visits assessing 90 subawards will be required this year. We are currently meeting this goal. With the increase in VOCA funds, we will also soon begin recruiting for additional fiscal analysts and grant monitoring positions, in order to support more on-site monitoring.