**File 4 Virginia’s Monitoring of Subawards**

DCJS continues to increase our oversight and monitoring of VOCA funded projects through policy implementation and staffing updates to ensure compliance with federal guidelines and regulations. 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 three additional programmatic Grant Monitors, a fiscal Grant Monitor, and a Grant Monitoring Supervisor. These new hires have resulted in a lower number of grants assigned per monitor, enabling more thorough monitoring activities and increased site visit capacity. Last year, DCJS updated its Grant Monitoring Policy and Procedures to ensure consistency with the VOCA Rule and the Federal Financial Guide for the awarding and monitoring of grants. A concurrent revision of the DCJS risk assessment tool was also created. The revised Grant Monitoring Risk Assessment Tool meets the required elements in 2 CFR 200.331 (b). In accordance with the Grant Monitoring Policy and Procedures, a risk assessment is completed by the Grant Monitor before the grant award period begins and/or annually. Using the DCJS Grant Monitoring Risk Assessment Tool enables the grant monitors 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. Risk assessment results are used to inform the monitoring plan for the following fiscal year.

At the beginning of each state fiscal year, grant monitors 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 uses 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. Due to the COVID-19 pandemic, DCJS grant monitors have shifted to performing virtual site visits. Virtual site visits follow the same procedures as in-person visits and utilize the same Sub-Grantee Monitoring Tool. It is anticipated that in-person follow-up visits will be completed with virtual site visit recipients once the pandemic-related travel restrictions are lifted.

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. It is the goal of the Grant Monitoring Policy and Procedures that all sub-grantees will receive a site visit at least every two years, with higher risk or new sub-grantees receiving more frequent visits. Based on current risk scores, 88 site visits were anticipated this federal fiscal year. To date, 38 site visits or 43% have been completed. We have experienced some challenges completing site visits this year due to COVID-19. The vast majority of site visits are scheduled during the spring and summer months and “Stay at Home” orders from Virginia Governors have impacted the ability of grant monitors to complete site visits. In this time of restricted travel, grant monitors have completed remotes site visits and enhanced desk reviews with plans to visit programs on- site once travel restrictions are lifted. It remains our plan to complete the remaining 50 site visits that were initially planned for Federal Fiscal Year 2020. If travel restrictions extend into the late summer and fall months, we will complete a reassessment of programs needing a full site visit and programs that need an on-site visit following a remote site visit. The monitoring plan will be updated to reflect these needed changes. All site visits, both remote and on-site, are completed using the DCJS Onsite Monitoring Tool and Checklist and are guided by our monitoring policy. In addition, subgrantees receive regular monitoring in the form of desk reviews and technical assistance.

Overall, it is the goal of the Grant Monitoring Policy and Procedures that all sub-grantees will receive a site visit at least every two years, with higher risk or new sub-grantees receiving more frequent visits. We are currently meeting this goal; currently 85.6% of sub-grantees have received or are scheduled to receive a site visit within the last two years. 100% of sub-recipients receive regular on-site monitoring. With the increase in VOCA funds, we were able to hire additional fiscal analysts and grant monitoring positions, in order to support more on-site monitoring. With the on-boarding of three new programmatic grant monitors and a Grant Monitoring Supervisor, our capacity to complete on-site monitoring has greatly increased. It is anticipated that by 2021, we will have achieved the goal of 100% of subgrantees receiving an onsite visit at least every two years.