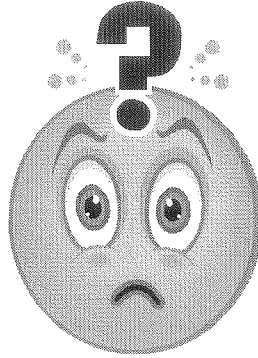
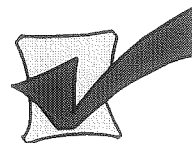


Certified Assurances  
for Victim Service Programs  
SFY2014



What are they & why do we have  
them?

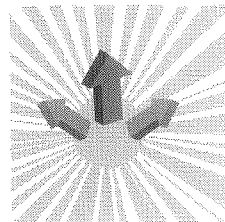
- Required of us by federal and state granting agencies in order to receive funds
- Each fund has its own Certified Assurances.
- To ensure that funded programs are in compliance with mandates.



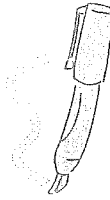
*Certified  
Assurances  
for all VSS  
Funds*

**Certification foundation**

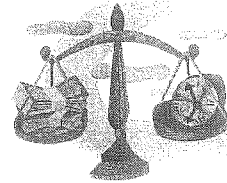
- Victim Safety, and respect for victim autonomy is at the core of the certified assurances.



## Highlights



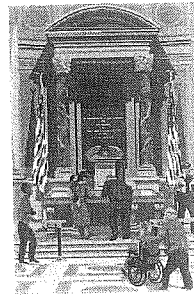
- Non-supplanting
- Reimbursement process
- All match must be from non-federal funds
- Time & Attendance Records



## Highlights

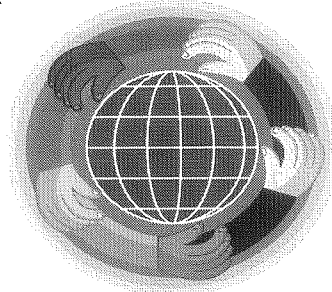


- Non-discrimination
- Civil Rights Compliance
- Equal Employment Opportunity Policy (EEOC)
- American Disabilities Act
- Drug-Free Workplace
- Lobbying
- Debarment



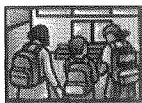
## Minority Impact Statement

- All Programs are required to complete and submit to the Victim Services Support (VSS) Program a Minority Impact Statement and complete the U.S. Office of Civil Rights (OCR) Worksheet.



## Can't Discriminate....

- Programs understand and agree that these funds may not be used to discriminate against or denigrate the religious or moral beliefs of students who participate in programs for which financial assistance is provided from these funds, or of the parents or legal guardian of such students.



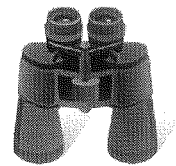
## No Retaliation

- In accordance with federal civil rights laws, the program shall not retaliate against individuals for taking action or participating in action to secure rights protected by federal civil rights laws.
  - Complainant or Witness



## Finding on Discrimination

- If there is a finding of discrimination, the program will forward findings to:
  - U.S. Department of Justice,
  - Office of Justice Programs,
  - Office for Civil Rights, and
  - Iowa Attorney General's Crime Victim Assistance Division



## Sexual Harassment Policy



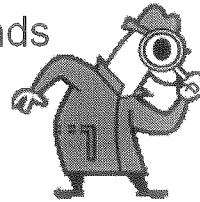
- Every program will create a sexual harassment policy
- Policy will include the process for filing a grievance against staff member, client, victim and volunteer
- All staff will review and sign off acknowledging it was read and understood
- Provide copy to staff and put copy in personnel file – **annually**

## Limited English Proficiency (LEP)

- Program must comply with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP).
- Steps must be taken to ensure the LEP persons have meaningful access to your programs.
- Additional info: <http://www.lep.gov>

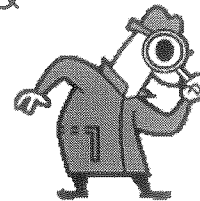
## Contact CVAD and the Office of Inspector General.....

- If false claims are submitted for grant funds, or
- Someone commits a criminal or civil violation of law pertaining to fraud, conflict of interest, bribery, gratuity or similar misconduct involving VW funds



## Office of Inspector General Contact Information

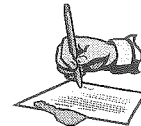
- Mail: Office of Inspector General, U.S. Department of Justice, Investigations Division, 950 Pennsylvania Avenue, N.W., Room 4706, Washington, D.C. 20530
- Email: [oig.hotline@usdoj.gov](mailto:oig.hotline@usdoj.gov)
- Hotline: 1-800-869-4499 (English & Spanish)
- Hotline Fax: 1-202-616-9881



## SAM (CCR) and DUNS

- Must agree to comply with applicable requirements & restrictions regarding System for Award Management (Sam.gov) (formerly known as CCR Registration)
- <https://www.sam.gov/portal/public/SAM/#1>
- <http://www.ovw.usdoj.gov/docs/sam-award-term.pdf>
- Provide a Data Universal Numbering System (DUNS) number.

## Termination of Funds

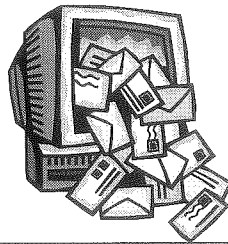


- Withholding, suspension, termination of funds (Contract #9 Termination)
- Misuse of funds may result in a range of penalties, suspension of current & future awards, suspension & debarment of federal grants, recoupment of monies and civil and/or criminal penalties.



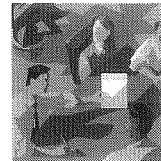
## VSS Funded Staff Changes

- Notify your primary VSS staff within 30 days in writing of any staffing change; e-mail is acceptable
- Notify your primary VSS staff CVAD in writing of any CVAD-funded positions that have remained vacant for 45+ days; notification must include reason for vacancy & plan for filling position; e-mail is acceptable



## Reports & Monitoring

- o Performance Reports
- o Site Monitoring (SM)
  - <\$25,000 in VSS funds
    - SM visit 1X every 6 years at a minimum
  - =>\$25,000 in VSS funds
    - SM visit 1X every 3 years at a minimum
  - Random SM visit because VSS staff in area
  - Emergency SM visit because of complaints or concerns
  - Drop-In SM visits to get a picture of program
    - *Please note we are not limited to this information outlined above.*



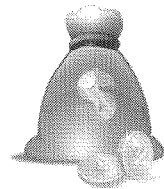
## Construction and other Items Prohibited

- Purchasing of real property
- Construction
- Capital improvements or physical modifications to building including minor renovations (such as painting and carpeting)



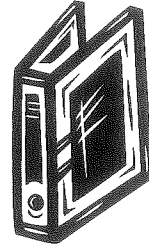
## Services

- Services must be free, confidential.
  - Cannot charge a fee to victims for services
- Funds may not be used as direct payment to any victim or dependent

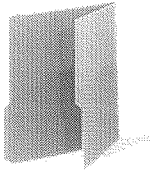


## Record Keeping and Reporting

- Reports shall be submitted in the correct form, on time and containing required information.
- Fund accounting, auditing, monitoring, evaluation procedures, and such records as CVAD shall prescribe shall be provided.

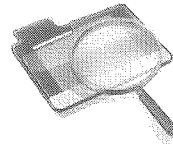


## Access to Records, Books, Papers or Documents



- Program will have open and transparent information made available to:
  - Office on Violence Against Women (OVW)
    - OVW Financial Management Office
  - Office for Victims of Crime (OVC)
  - Office of the Chief Financial Officer (OCFO)
  - Victim Services Support Program through the Iowa Attorney General's Crime Victim Assistance Division
  - Any representatives of these agencies

## Audit



- Non-Federal entities that expend \$500,000 or more in Federal Funds.
  - A single organization-wide audit
  - In accordance with the provisions of Office of Management & Budget (OMB) Circular A-133
- Non Federal entities that expend less than \$500,000 in Federal awards are exempt from Federal audit requirements for that year.
- Audits due to CVAD the earlier of 30 days after receipt of the report or nine (9) months after the end of the audit period.

## Financial Requirements & Audit Information



- Comply with organization audit requirements of OMB Circular A-133, Audit of States, Local Governments, Non-Profit Organizations
  - Funds can be held or requirements can be imposed for outstanding audit issues.
- VW & SF Funds must comply with current edition of the OVW Financial Grants Management Guide
  - <http://www.ovw.usdoj.gov/docs/ovw-fgmg.pdf>
- VA funds must comply with current edition of the OCFO Financial Guide
  - [http://www.ojp.gov/financialguide/PDFs/OCFO\\_2013Financial\\_Guide.pdf](http://www.ojp.gov/financialguide/PDFs/OCFO_2013Financial_Guide.pdf)

## Consultation Rates

- VW and SF Funds will comply with all consultation rates and requirements as outlined in the OVW Financial Grants Management Guide.
- VA Funds will comply with the OCFO Financial Guide requirements.



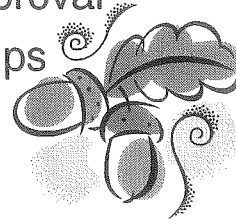
## Information Cooperation

- The program will cooperate with any assessments, national evaluation efforts, or information or data collection requests, including, but not limited to, the provision of any information required for the assessment or evaluation of any activities within this project.



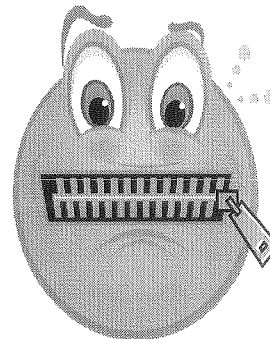
## Specific Prohibition - ACORN

- No federal funds, either directly or indirectly, will be used to support any contract or subaward to either the Association of Community Organizations for Reform Now (ACORN) or its subsidiaries, without written approval
- Direct questions to Donna Phillips regarding this problem



## Confidentiality Condition

- No personally identifying information *“collected in connection with services requested, utilized, or denied”* to be revealed, UNLESS;
- *“informed, written, reasonably time-limited consent of the person”* is obtained



## When Release of Information is Compelled



- Statutory mandates
- Court Orders
- If a release is compelled, programs must make reasonable attempts to provide notice to victims
- Take steps necessary to protect privacy and safety of persons affected

## Confidentiality and Information Sharing



- programs and Subprograms may share *“non-personally identifying data in the **aggregate** regarding services to their clients and non-personally identifying demographic information in order to comply with Federal, State, tribal, or territorial reporting, evaluation, or data collection requirements...”*

## HUD/HMIS

- Under the confidentiality rules, programs shall not provide personally identifying information to HUD/HMIS
- Provide aggregated data to HUD/HMIS only



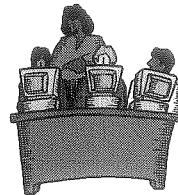
## Conferences

- Funds will not be used to pay for food and beverages for putting on a conference, retreat, seminar, symposiums, trainings and other events.
- Information/guidance can be found at:  
<http://www.ovw.usdoj.gov/grantees.html>





## Training & Training Materials



Any training or training materials developed or delivered with funding provided under this award must adhere to the Federal (OVW or OVC) Training Guiding Principles for Grantees & Subgrantees available at

[//www.ovw.usdoj.gov/grantees.html](http://www.ovw.usdoj.gov/grantees.html).

**NEW**

## Computer Network.....



Funded Programs understand and agree that

- (a) no VW funds may be used to maintain or establish a computer network unless such network blocks the viewing, downloading and exchanging of pornography and
- (b) nothing in subsection (a) limits the use of funds necessary for any Federal, State, local, tribal or local law enforcement agency or any other entity in carrying out criminal investigations, prosecution or adjudication activities.

**NEW**

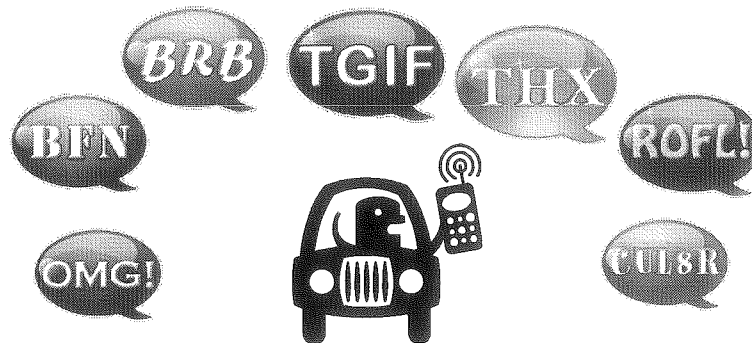
## Seat Belts...

- Buckle up! It's the law and a certified assurance.



## No Texting Driving

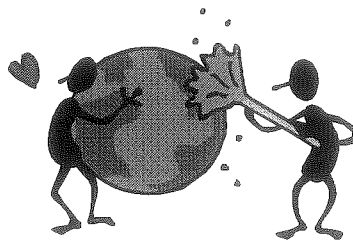
- No texting while driving! It's the law and a certified assurance.



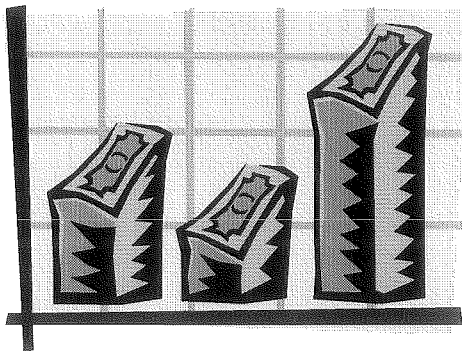
(Executive Order 13513)

## Environment...

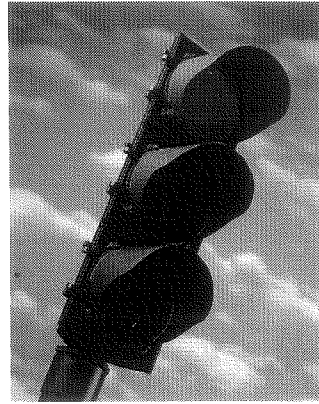
- Recipients agree to comply with the National Environmental Policy Act and related National Historic Preservation Act.



## Fund-Specific

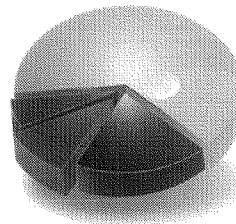


*STOP Violence  
Against Women  
(VW) Specific  
Certified Assurances*



Congressional Percentages 

- Victim Services (30%)
- Law Enforcement (25%)
- Prosecution (25%)
- Courts (5%)
- State's Discretion or Discretionary (15%)



## Types of Victims Served

- Violence Against Women funds can only be used for issues related to:
  - Domestic Violence
  - Sexual Assault
  - Stalking
  - Dating Violence
- Investigations of Child Sexual Abuse cannot be covered with VW funds.



## Collaboration with Victim Services

- All VAWA recipients that are court, law enforcement, prosecution, and statewide agencies must certify that they have consulted with their local victim service agency.



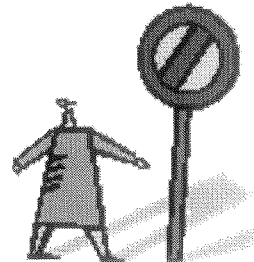
## “Don’ts”

- Funds cannot be used to support chemical dependency or alcohol abuse programs that are not an integral part of a court-mandated batterer intervention program.

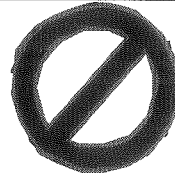


## “Don’ts”

- Funds cannot be used to:
  - conduct public awareness or community education campaigns or related activities (except for FV or FVPSA funds)
  - Support the development of presentation of DV, SA, Dating Violence and/or stalking curriculum for primary/secondary schools.
    - Will not be used to teach primary/secondary school students from an already existing curriculum.



## “Don’ts”



- Without written approval of the Federal Office on Violence Against Women:
  - Federal funds cannot be used in support of any contract or subaward to either Association of Community Organizations for Reform Now (ACORN) or its subsidiaries.



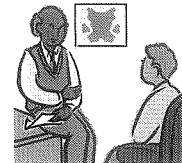
*Certified  
Assurances for  
STOP VAWA &  
SASP Funded  
Programs*

## Victim Safety & Recovery

- Procedures/policies that exclude victims from receiving safe shelter, advocacy, services, counseling & other assistance based on their actual or perceived sex, age, immigration status, race, religion, sexual orientation, gender identity, mental health condition, physical health condition, criminal record, work in the sex industry, or the age and/or sex of their children; . . .



## Specific Prohibitions for VAWA & SASP



- Mediation or Alternate Dispute Resolution
- Couples Counseling
- Family Counseling
- Any other manner or joint victim-offender counseling
- Mandatory counseling for victims
- Pre-trial diversion programs not approved by Office on VAW



## VAWA and SASP Specific Prohibition

- Intervention programs for perpetrators that don't use the coercive power of the criminal justice system to hold them accountable for their behavior such as
  - Anger management
  - Stress management

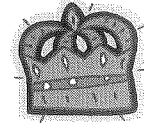


## VAWA and SASP Specific Prohibitions

- Forcing victims to testify
- Penalizing victims who refuse to testify
- Promoting Procedures that would require victims to seek legal sanctions against their abusers:
  - Seek a protective order
  - File formal complaint



## Royalty-Free...



- OVW reserves a royalty-free, nonexclusive, and irrevocable license to reproduce, publish or otherwise use, and to authorize others to use, in whole or in part (including in the creation or derivative works), for Federal Government purposes:
  - Any work that is subject to copyright & was developed under this award, subaward, contract or subcontract pursuant to this award/contract, and
  - Any work that is subject to copyright for which ownership was purchased by a recipient, subrecipient or a contractor with support under this award/contract.

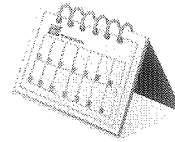
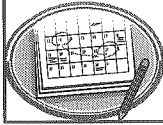
## VAWA and SASP Specific

- Advance written approval
  - (1) using award funds to purchase ownership of, or a license to use, a copyrighted work; or
  - (2) incorporating any copyrighted work, or portion thereof, into a new work developed under this award.

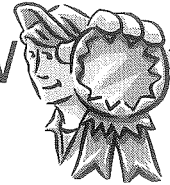


## VAWA & SASP Specific

- A copy of all reports and any other written materials or products that are funded under the project will be forwarded to
- The Victim Services Support Program through the Iowa Attorney General's Crime Victim Assistance Division
- No less than 20 days prior to public release.
- If materials compromise victim safety materials will need to be revised.



## Materials created with VW and/or SF (SASP) funds



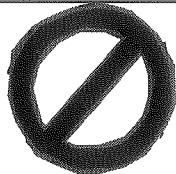
- All materials publicizing or resulting from award activities shall contain an acknowledgement of the awarding agency assistance.

"This project was supported by subgrant No. \_\_\_\_\_ awarded by the state administering office for the (STOP Formula Grant Program or SASP Formula Program). The opinions, findings, conclusions and recommendations expressed in this publication/program/exhibition are those of the author(s) and do not necessarily reflect the views of the Department of Justice, Office on Violence Against Women."

## “Don’ts”



- Funds cannot be used to support inherently religious activities, such as worship, religious instruction, or proselytization.
- Regulations pertaining to this:  
<http://www.os.dhhs.gov/fbci/waisgate21.pdf>



## Don’t

- Cannot use any federal funds, either directly or indirectly, in support of the enactment, repeal, modification or adoption of any law, regulation or policy, at any level of government without prior written approval of OVW, in order to avoid violation of 18 USC Section 1913.



## However....

- May use federal funds to collaborate with and provide information to Federal, State, local, tribal and territorial public officials & agencies to develop and implement policies to reduce or eliminate DV, dating violence, SA and stalking [defined by 42 USC 13925(a)] when such collaboration & provision of information is consistent with the activities otherwise authorized under this grant program.
- Check with OVW and VSS Program....

## *Certified Assurances for VOCA Funded Programs*

## VOCA Specific



- All materials publicizing or resulting from award activities shall contain an acknowledgement of the awarding agency assistance.
- “This project was supported by Award No. 2013-VA-GX-0049 awarded by the Office of Victims of Crime, Office of Justice Programs.”

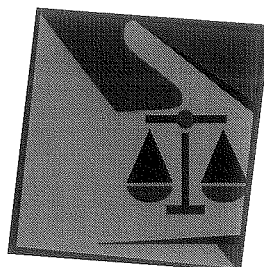
## VOCA Specific

- Public or Non-Profit program
- Providing direct, free, confidential services to victims of crime



## VOCA Specific

- Cannot discriminate against a victim who disagrees with the manner in which criminal prosecution is pursued



## VOCA Specific

- Promote coordination of public/private efforts to aid crime victims
- Assist with Crime Victim Compensation application process and benefits.



## VOCA Specific

- Must use volunteers in VOCA programming



## VOCA Specific

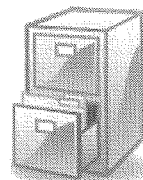
- Programs must demonstrate a record of providing effective services to crime victims. Including –
  - Support and approval of services by community
  - History of providing direct services in a cost-effective manner
  - Financial support from other sources



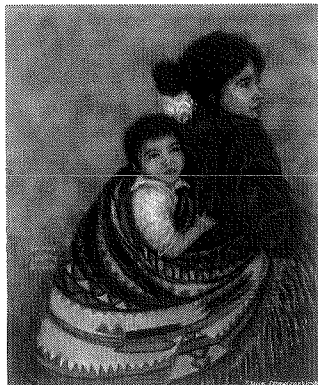


## VOCA Specific

- Programs will maintain effective program and financial records that fully disclose the amount of disposition of VOCA funds received. Including:
  - Financial documentation for disbursements
  - Daily time and attendance records for paid staff and volunteers
  - Client Files
  - Other sources of revenue
  - Job descriptions
  - Contracts for services
  - And other records which facilitate an effective audit



## Family Violence Prevention and Services Act (FVPSA)



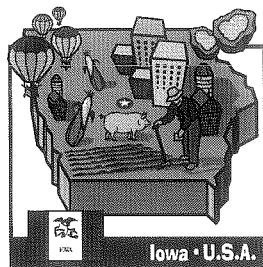
## FVPSA Specific

- Address/location of shelter or facility assisted under the Act shall not be made public.



## FVSPA Specific

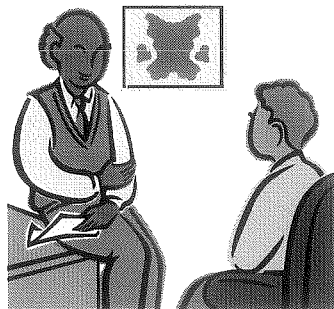
- Encourages Buying American-Made Equipment and Products.



*Certified  
Assurances for SF  
or SASP Funded  
Programs*

**SASP Specific**

- SASP Funds specifically used for:
  - Direct intervention and related assistance to victims of sexual violence



## Purpose



- The overall purpose is to provide intervention, advocacy, accompaniment, support services, and related assistance to:
  - Adult, youth and child victims of sexual assault
  - Family and household members of such victims
  - Those collaterally affected by the victimization
    - Friends, co-workers, classmates – NOT the perpetrator

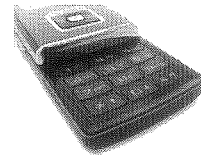


## Fund Eligibility

- Only non-profit SA programs are eligible
- Governmental programs providing rape crisis services are not eligible
- State Coalitions ARE eligible



## SASP Allowable

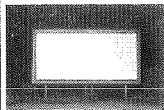


- SASP funds can be used for
  - Direct services
  - Supporting the establishment, maintenance and expansion of SA centers and other programs/projects that assist SA victims
  - Crisis lines
  - Advocacy and accompaniment through the criminal justice and medical systems



## SASP can't be used for....

- Sexual Assault Nurse Examiner projects
- Criminal justice-related and forensic interviews
- Prevention efforts (social norm campaigns, bystander intervention, presentations on healthy relationships, etc.)
- Efforts focused on Sexual Assault Response Teams (SARTS)
- Providing DV services not related to SA



## SASP Funds will not....

- Funds will not support activities that may compromise victim safety including, but not limited to crafting policies:
  - that deny individuals access to services based on their relationship with perpetrator
  - or engaging in practices that impose restrictive conditions in order to receive services



## SASP Funds will not support....

- Funds will not support activities that may compromise victim safety including, but not limited to:
  - Developing materials that are not tailored to the dynamics of sexual assault or the culturally specific population to be served
  - Crafting policies that require the victim to report the SA to law enforcement



## VSS Staff

Luana Nelson-Brown  
Community Specialist  
Phone: 1-515-242-6112  
Email: [Luana.Nelson-Brown@iowa.gov](mailto:Luana.Nelson-Brown@iowa.gov)

Donna Phillips  
VSS Administrator  
Phone: 1-515-281-7215  
Email: [donna.phillips@iowa.gov](mailto:donna.phillips@iowa.gov)

Shirley Davis  
Community Specialist  
Phone: 1-515-281-0563  
Email: [Shirley.Davis@iowa.gov](mailto:Shirley.Davis@iowa.gov)

Dekow Sagar  
Community Specialist  
Phone: 1-515-281-5206  
Email: [Dekow.Sagar@iowa.gov](mailto:Dekow.Sagar@iowa.gov)