

Issue Date: August 19, 2021

VOCA & SAFEPLAN Compliance Checklist

What follows is a reference list of common compliance items that subrecipients of VOCA and SAFEPLAN funds should adhere to throughout an award cycle. While this list is not comprehensive of all compliance components or requirements, it does highlight items that are commonly overlooked. A more comprehensive outline of all VOCA and SAFEPLAN award requirements can be found in MOVA's VOCA and SAFEPLAN policies and procedures manuals available via MOVA's website (<https://www.mass.gov/service-details/for-currently-funded-agencies>).

Office for Civil Rights

- Equal Employment Opportunity Program (EEO) – Compliance with EEO requirements for the duration of the award cycle. This requires, at a minimum, a yearly EEO Certification Form to be completed (<https://www.ojp.gov/program/civil-rights/equal-employment-opportunity-plans>).
- Non-discrimination Provisions – Subrecipients may not discriminate on the basis of race, color, national origin, religion, sex, disability, or age. Subrecipients must document non-discrimination practices in the provision of services and employment practices and have a method to notify clients/prospective clients and employees/prospective employees of non-discrimination practices and the process by which a client and/or employee can file a grievance alleging discrimination.
- Office for Civil Rights Training Requirement – Required components of the online civil rights training must be completed each award cycle and a minimum of one appropriate agency representative must remain trained for the duration of the award period (<https://www.ojp.gov/program/civil-rights/video-training-grantees>).

Reporting Requirements

- Expenditure Reports – Timely and accurate submission of monthly expenditure reports
- Back-Up Documentation – Retention of back-up documentation for all reimbursement requests made to the award, regardless of requirements for submission of back-up documentation to MOVA with expenditure reports
- Performance Reports – Timely and accurate submission of quarterly performance reports via the Outcome Measurement Tool (OMT)

Financial Management

- Financial Management System – A financial management system must be in place that is able to record and report on the receipt, obligation, and expenditure of grant funds
- Accounting Records – Maintenance of all award revenue and expenses must be tracked accurately within a financial management system

- Separation of VOCA and SAFEPLAN Funds – All award revenue and expenses must be able to be separated from other agency revenue and expenses and, if there are multiple awards, agencies must be able to separate VOCA and SAFEPLAN funding by program/award.
- Cost reimbursement - Reimbursements should only be requested for expenses included in the approved program budget, and only after the expenses have been incurred and expended.
- Allowability - All costs billed to the award must be either VOCA or SAFEPLAN allowable
- Equipment Inventory – A detailed inventory of all equipment purchased with VOCA and SAFEPLAN funds must be kept, as outlined in the policies and procedures manual, for any equipment costing over \$5,000 (or the agency’s capitalization policy, if less than \$5,000).

Programmatic Administration:

- Breach of PII Policy – Written procedures must be in place to respond in the event of an actual or imminent breach of personally identifiable information (PII). This must include the requirement to report any actual or imminent breach to MOVA immediately.
- Crime Victim Compensation Benefits (VC) – Subrecipients must ensure that staff are trained in VC and assist victims/survivors in seeking and applying for benefits. Programs must maintain a supply of VC brochures and establish policies/procedures to identify who may be eligible for VC.

General

- Employment Eligibility – Subrecipients must abide by all state and federal employment laws and verify eligibility for all VOCA and SAFEPLAN funded employees to work in the United States
- VOCA Special Conditions – Subrecipients must review and adhere to all applicable VOCA Special Conditions. Special conditions can be found on MOVA’s website.

Timeline Overview Checklist - When to submit to MOVA:

Requirement	How Often
Equal Employment Opportunity Program (EEOP) Certification Form	Annually
Office for Civil Rights Training Requirement	Once per award cycle
Expenditure Reports	Monthly, unless stated otherwise by MOVA
Backup Documentation for reimbursement expenses	Ongoing retention; submission to MOVA dependent on monitoring risk level
Performance Reports (i.e., Outcome Measurement Tool)	Quarterly
Programmatic Change Forms	Within two weeks of staffing change
Out of State Travel Request Form	Within 30 days of travel. Prior approval required.
Budget Amendments	As needed. Amendment must be approved by MOVA prior to reimbursement to be in compliance with the subrecipient’s grant