

# Domestic Violence Program Funding Administration Guide



**COLORADO**

**Office of Children,  
Youth & Families**

Domestic Violence Program

8/12/2019  
Version 3.4

# FUNDING ADMINISTRATION GUIDE

## Contents

1. General Information.....	3
1.1 Purpose of the Funding Administration Guide .....	3
1.2 About the Domestic Violence Program .....	3
1.3 Budget & Funding Sources.....	4
1.4 Advisory Committee .....	5
1.5 Funding Committee.....	5
1.6 Communication.....	6
1.7 Contact Information Form.....	7
1.8 New and Interim Executive Directors .....	8
1.9 Client Assessment, File & Event (CAFÉ) Management System .....	8
1.10 Training & Technical Assistance .....	9
1.11 Contracting .....	9
2. Financial Requirements & Reporting .....	10
2.1 Allowable & Unallowable Costs.....	10
2.2 General Budget Specifications.....	11
2.3 Determining Shared Cost Allocations .....	12
2.4 Indirect Costs .....	13
2.5 Required Match.....	14
2.6 Reimbursement of Expenses .....	15
2.7 Back-Up Documentation - Timesheet Requirements .....	16
2.8 Back-Up Documentation - Other Requirements .....	17
2.8 Budget Modifications .....	18
3. Programmatic Requirements .....	20
3.1 Purpose of Programmatic Requirements.....	20
3.2 State Standards and Federal Requirements .....	20
3.3 Confidentiality Requirements .....	21
3.4 Data Reporting Requirements .....	21
3.5 Financial Policy Requirements.....	22
3.6 Governing Body Requirements.....	23
3.7 General Operations & Administrative Requirements .....	23

# Domestic Violence Program Funding Administration Guide

3.8 Personnel Requirements .....	25
3.9 Volunteer Requirements .....	26
3.10 Community Services.....	26
3.11 Crisis Response Services.....	27
3.12 Domestic Violence Victim Advocacy Services .....	27
3.13 Residential Domestic Violence Victim Advocacy Services .....	28
3.14 Domestic Violence Victim Advocacy Services for Children & Youth .....	29
4. Monitoring Requirements .....	30
4.1 DVP Monitoring Plan .....	30
4.2 Certificate of Occupancy .....	32
4.3 General Liability Insurance.....	32
4.4 Annual Fire Safety Inspection.....	33
4.5 Independent Audit / Financial Statement Reviews .....	33
4.6 Water Safety Documentation .....	34
4.7 Year-End Narrative .....	34
4.8 Four-Year Monitoring Plan.....	35
4.9 On-Site Visits .....	36
4.10 Financial Desk Reviews .....	37
4.11 Data Desk Reviews .....	38
4.12 The 1:1 Meetings .....	39
4.13 Crisis Line Check Policy & Procedures .....	39
4.14 Compliance Tracking Protocol .....	40
5. Other Requirements .....	42
5.1 Formal Complaints.....	42
5.2 Critical Incident Reporting .....	42

# Domestic Violence Program Funding Administration Guide

## 1. General Information

### 1.1 Purpose of the Funding Administration Guide

This guide provides organizations that receive funding from the Domestic Violence Program (DVP) with information regarding policies and procedures that govern the administration of DVP funding. Individuals employed by DVP-funded organizations who are responsible for administration of their DVP contract should familiarize themselves with the contents to become aware of all policies, procedures, and general requirements. This guide is reviewed and approved every two years, at minimum, by the DVP Advisory Committee. Please direct any questions regarding this guide to a DVP team member:

Brooke Ely-Milen, Director  
303-866-3321  
[Brooke.ElyMilen@state.co.us](mailto:Brooke.ElyMilen@state.co.us)

Beth Collins, Specialist  
303-866-2855  
[Beth.Collins@state.co.us](mailto:Beth.Collins@state.co.us)

Chelsea Baldwin, Data Specialist  
303-866-3408  
[Chelsea.Baldwin@state.co.us](mailto:Chelsea.Baldwin@state.co.us)

Melissa Snider, Program Assistant  
303-866-3150  
[Melissa.Snider@state.co.us](mailto:Melissa.Snider@state.co.us)

### 1.2 About the Domestic Violence Program

In 1983, the Colorado General Assembly created the Domestic Violence Program (DVP). Located in the Colorado Department of Human Services (CDHS), Office of Children, Youth and Families (OCYF), DVP is the sole government entity dedicated entirely to funding and sustaining community-based domestic violence organizations across the state. DVP oversees approximately \$3 million annually in funding designated to intervene, prevent, and respond to domestic violence. DVP is the lead authority within CDHS and state government for issues pertaining to domestic violence.

#### Vision

The vision of DVP is to promote and sustain a culture free of domestic violence for all Coloradans.

#### Mission

The mission of DVP is to partner with communities to promote the safety and well-being of domestic violence survivors and prevent acts of domestic violence through good stewardship of funding resources.

#### Nondiscrimination Commitment

DVP is committed to serving Colorado community-based domestic violence advocacy organizations and survivors without prejudice regarding level of income, actual or perceived sex, including gender identity, gender expression, religious beliefs, actual or perceived sexual orientation, immigration status, age, race, creed, ethnicity, color, national origin, marital status, spoken language, disability, or military status or any other factor. DVP is dedicated to funding community-based organizations that are committed to creating an environment that is accessible, culturally relevant, and trauma-informed for all domestic violence survivors and their families.

# Domestic Violence Program Funding Administration Guide

## 1.3 Budget & Funding Sources

DVP utilizes several sources of funding for three main purposes:

1. Contracts with organizations providing direct services to domestic violence survivors and their families, offering education activities to their local communities, and engaging in efforts to prevent domestic violence. These contracts blend state cash funds and federal dollars and operate on the Federal Fiscal Year Cycle (October 1 - September 30).
2. Contracts with providers who make available training and technical assistance to DVP funded organizations. The training and technical assistance is primarily funded with state cash funds.
3. DVP administrative and operational costs such as staff salaries, overhead, and travel.

In total DVP administers approximately \$3 million annually from the sources described below.

### Colorado Domestic Abuse Fund (CDAF)

CDAF was created under CRS § 39-22-801 to allow Colorado taxpayers to make voluntary contributions on their individual income tax forms. Funds collected are to be distributed according to CRS § 26-7.5-101 which states that the purpose of the funding is “to encourage the development of domestic [violence] programs by units of local government and non-governmental agencies.” CDHS, through DVP, is responsible for administering the CDAF. These funds are scheduled to sunset in 2021.

### Family Violence Prevention and Services Act (FVPSA)

FVPSA funding is based on federal appropriations and available to all states based on a population formula. DVP uses 95% of FVPSA funding for direct services contracts and 5% for DVP administrative costs. The legislation creating this funding was amended most recently by the Child Abuse Prevention and Treatment Act (CAPTA) Reauthorization Act of 2010 (P.L. 111-320), which extended funding authority for FVPSA through FY2015. The FVPSA administration awards grants to States in order to assist in supporting the establishment, maintenance, and expansion of programs and projects:

1. To prevent incidents of family violence, domestic violence, and dating violence;
2. To provide immediate shelter, supportive services, and access to community-based organizations for victims of family violence, or dating violence, and their families; and,
3. To provide specialized services for children exposed to family violence, domestic violence, or dating violence, underserved populations, and victims who are members of racial and ethnic minority populations.

FVPSA funding is administered federally by the United States Department of Health and Human Services, Administration for Children and Families, Family and Youth Services Bureau:

<http://www.acf.hhs.gov/programs/fysb/programs/family-violence-prevention-services>. FVPSA Rules can be found at in the Federal Register: <https://www.gpo.gov/fdsys/pkg/FR-2016-11-02/pdf/2016-26063.pdf>

# Domestic Violence Program Funding Administration Guide

## Temporary Assistance for Needy Families (TANF)

TANF dollars are based on annual Federal appropriations and on Colorado's performance on certain measures related to the primary purposes of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA). These dollars are made available to the states through the PRWORA, passed by the 104<sup>th</sup> Congress, Public Law 104-193. In the State of Colorado, TANF funds are administered by the CDHS Division of Employment & Benefits (formerly Colorado Works) and a portion of the funds are designated for DVP by annual appropriations in the State budget to sub-contract to community-based domestic violence organizations. These dollars are to be used to provide services to TANF eligible survivors of domestic violence and their families. One hundred percent of TANF dollars are contracted to funded organizations for delivery of direct services to survivors and their families.

## Marriage License and Divorce Filing Fees

In 2009, the Colorado Legislature passed Senate Bill 68, which increased marriage license fees by \$20.00 and fees for divorce petitions and responses by \$10.00 each. The total increase to the marriage license fee and \$5.00 of the divorce petition fee are collected by county clerks and court clerks and allocated to DVP for the primary purpose of supporting direct services at community-based domestic violence organizations.

## 1.4 Advisory Committee

In accordance with DVP Rule 12.200.5, DVP convenes regular meetings of a stakeholder group called the Advisory Committee. The purpose of the Advisory Committee is to provide a stakeholder voice to guide and inform proper stewardship of DVP resources. The Advisory Committee conducts periodic reviews of the DVP Rules, counsels DVP regarding domestic violence policy development, reviews complaints from individuals concerning funded organizations, and more. Membership of the Advisory Committee consists of individuals from funded organizations, other community-based organizations or governmental agencies, a representative from Violence Free Colorado (formerly the Colorado Coalition Against Domestic Violence), and those who are knowledgeable in the field of domestic violence or nonprofit management.

Additional details about the governance of the Advisory Committee can be found on this document: [DVP Advisory Committee Governance](#).

## 1.5 Funding Committee

To achieve equitable distribution of federal and state funding for domestic violence advocacy services, DVP relies on the assistance of two groups of volunteers, 1) Funding Committee members; and 2) Review Panel members as necessary.

Funding Committee members provide input into the development of Requests for Proposals (RFP) or other procurement methods, and ensure that DVP establishes an equitable process to award funding to Colorado communities. In 2019, the Funding Committee approved the following formula basis to award funding to all eligible mainstream domestic violence organizations that submitted a proposal:

# Domestic Violence Program Funding Administration Guide

Component	Percentage of Formula Funds Awarded	Description
Population	15%	Each organization receives a portion of the funds based on the population of the county of their primary location.
Rural	10%	Each organization receives a portion of these funds if the address of their primary location is listed as rural eligible according to the Federal Health Resources & Services Administration.
Shelter	25%	Each organization with a residential shelter facility receives a portion of these funds based on the number of bed nights as reported to DVP in the most recent Federal Fiscal Year.
Non-Residential Site	30%	Each organization receives a portion of these funds if they meet one of more of the following criteria: have at least one non-residential service site, have at least one additional non-residential service site, provide mobile advocacy, or have co-located services at a county department of human services.
High & Medium Poverty Service Area	5%	Each organization receives a portion of these funds if the county of their primary location is designated as high or medium poverty, per the U.S. Census Bureau.
Outreach and Service to Underserved	10%	Each organization receives a portion of these funds for satisfying requirements to advance services that are accessible to underserved populations.
Outcome Measurement Implementation	5%	Each organization receives a portion of these funds for completing key activities for implementing an outcome measurement tool called Measurement of Victim Empowerment Related to Safety (MOVERS).

In addition to the funding formula for mainstream domestic violence organizations, the Funding Committee also set aside funding for culturally-specific and specialized organizations. The set aside is not included in the formula funding calculations.

To ensure a fair review process, the Review Panel members independently score proposals to assess the quality of the proposal. The scores are assessed by the Funding Committee, who makes recommendations for awards to DVP. The Funding Committee and Review Panel each consist of individuals knowledgeable in the field of domestic violence, representing various disciplines to provide a broad perspective of how funding should be awarded.

Additional details about the governance of the Funding Committee can be found on this document: [DVP Funding Committee Governance](#).

## 1.6 Communication

DVP shall communicate with funded organizations primarily via email. It is the responsibility of each funded organization to ensure that all DVP email communication is sent to a working email address that is regularly checked (at least several times per week) by an employee of the funded program, preferably the executive director. Funded organizations shall update the official DVP Contact Information Form as soon as possible, whenever there is a change in personnel or email address to ensure the program continues to receive timely communication. See [Section 1.7 Contact Information Form](#) for instructions on how to update the form when necessary.

# Domestic Violence Program Funding Administration Guide

DVP uses a third party communication program ([MailChimp](#)) to disseminate newsletters and other emails to funded organizations. Important contract and DVP requirements are included in those newsletters and emails and it is the responsibility of the funded program to ensure these newsletters and other mass communications are received and reviewed in a timely manner.

Additionally, all funded organizations will be assigned a primary DVP Staff Liaison. The DVP Liaison will be the point person for any questions a funded program may have about DVP. The intent of the DVP Liaison is to streamline communication with funded organizations and provide an easier path to communicate with DVP directly when needed. Funded organizations will be notified of their DVP Staff Liaison at the onset of the contract period or if there is a change in DVP Liaison assignment.

## 1.7 Contact Information Form

### Purpose

DVP communicates with funded organizations often for various reasons including data reporting, reimbursements, compliance, and more. It is vital that DVP has up-to-date contact information for individuals who are employed at each organization and are responsible for administering the DVP contract.

The Contact Information Form is the repository for the people at the organization that are designated contacts for the DVP contract. The people listed on this form will receive important information regarding deadlines, contract requirements, etc. This also informs DVP of the person who may sign reimbursements and contracts on behalf of the organization. Only the individuals noted on this form will be able to make decisions regarding actions on the contract such as signing invoices.

### Funded Organization Requirements

It is the responsibility of each funded organization to:

1. Complete a [DVP Contact Information Form](#) at the start of the contract. On an ongoing basis, funded organizations may update that form at any time via the link emailed after completion of the form. If the link is not saved, please contact your DVP Liaison to request that the organization-specific link is emailed to you and be sure to keep the link for future reference.
2. Inform DVP in a timely manner of changes to the official contract contact people.
3. Provide the name and email address of contacts in the following areas: chair or president of the board of directors or other governing body, the executive director of the organization, a program contact, a financial contact, a data reporting contact, and a CAFÉ contact. The same person may serve as the official contact in multiple areas simultaneously and DVP recommends that at least two employees serve as official contacts.
4. Identify who is able to sign reimbursement forms and contract documents.
5. Ensure DVP communications are sent to working email address regularly checked by an employee.
6. Include a letter signed by the board chair or president, when making a change to the executive director contact, authorizing the change with the new executive director's date of hire.

**DVP Contact Information Form**

Organization Info    Governing Body Contact    Executive Director Contact  
Program Contact    Financial Contact    Data Reporting Contact  
CAFÉ Contact    Authorization

Please complete the following form. DVP recommends listing at least two employees to ensure the program receives important communication from DVP.  
If you have any questions, please contact Chelsea Baldwin at [chelsea.baldwin@state.co.us](mailto:chelsea.baldwin@state.co.us).

Organization Name

DBA or Program Name   
If different from Organization Name

Name of Person Completing Form    
First Name    Last Name

E-mail   
ex: myname@example.com

Program Mailing Address   
Street Address



# Domestic Violence Program Funding Administration Guide

## DVP Responsibilities

1. Maintain a record of all contacts listed on the DVP Contact Information Form to communicate as needed.
2. Send the [DVP Contact Information Form](#) at the onset of the contract cycle for new organizations.
3. Send a courtesy request to funded organization if and when changes to the contact list are needed.
4. Respond to requests for the link to be resent if a funded organization did not save the email with the link.

## 1.8 New and Interim Executive Directors

### Purpose

There may be turnover at the organization including changes in the executive director position. DVP recognizes that funded organizations have multiple funding sources and it can sometimes be difficult to distinguish the unique requirements of each source. As such anyone who is a new executive director or is assuming executive director duties during a transition period is encouraged to become familiar with DVP requirements.

### Funded Organization Requirements

It is the responsibility of each funded organization to:

1. Inform DVP of the transition of the executive director position prior to the last work date, when feasible.
2. Provide DVP with a status update regarding who will assume the executive director duties and whether this person is acting on a permanent or interim basis.
3. Provide a letter from the governing body officially appointing the new or interim executive director via the DVP Contact Information Form, as noted above.
4. Review all [DVP Contract Webinars](#) if the new or interim executive director is not already familiar with DVP requirements.
5. Request a phone call with the DVP Director within the first month of starting their role to ask any questions about DVP requirements.

### DVP Responsibilities

1. Send an email to new or interim executive directors with DVP contract information, resources, deadlines, and links to educational webinars.
2. Be available to meet during the first month of the transition, upon request.

## 1.9 Client Assessment, File & Event (CAFÉ) Management System

DVP developed a cloud-based customer-relationship management database in response to a survey conducted in 2013 that indicated that there was no effective, efficient, or consistent way of collecting data for domestic violence organizations in Colorado. The Client Assessment, File & Event (CAFÉ) Management System was implemented and rolled out to all funded organizations in 2014-2015.

The purpose of the database is two-fold:

1. A client management system for funded organizations to track all DVP-reporting and grant requirements to include tracking of clients, assessments, contacts, community events, and volunteers.
2. A contract management system for DVP to track all funded program related information to include compliance, audits, and data management

# Domestic Violence Program Funding Administration Guide

The use of the CAFÉ is required for all funded organizations for grant management and data reporting including submission of reimbursements, monthly and quarterly data reports, and other contract requirements. The client management portion of the CAFÉ is not required, but highly encouraged for all funded organizations.

DVP issues a User Guide and a System Admin Guide for assistance with using the CAFÉ along with other training tools, including formation of a CAFÉ User Group (see resource links below.) DVP provides technical support and training for all funded organizations for the CAFÉ as needed. Funded organizations are required to have at least one person at the organization who is the contact for CAFÉ related activities as indicated on the DVP Contact Information Form (see [Section 1.7 Contact Information Form](#) for more information).

## Funded Organization Requirements

It is the responsibility of each funded organization to:

1. Have at least one (1) employee trained as a system administrator for the CAFÉ. DVP recommends two or more employees be trained whenever possible.
2. Maintain a training plan to ensure all necessary staff are trained in use of the CAFÉ.
3. Maintain their Salesforce user licenses. This is an allowable cost in the DVP contract for funding, if the program is not eligible for free licenses or requires additional licenses.
4. Use the CAFÉ for reporting Monthly & Quarterly Data reports, submitting Monthly Reimbursements, and completing other contract compliance related tasks (i.e., proof of General Liability insurance).
5. Maintain the client management instance of the CAFÉ, if applicable, and ensure any systemic changes made will not interfere with DVP requirements.
6. Provide assurances on the use and maintenance of the CAFÉ via the DVP Contracting Form.

## DVP Responsibilities

1. Provide the free CAFÉ managed package to organizations funded by DVP including an updated package as needed at no cost to the organizations.
2. Provide free technical support for funded organizations on CAFÉ topics such as user management, configuration, reporting requirements, etc.

## CAFÉ Resources

- [CAFÉ User Guide](#)
- [CAFÉ System Admin Guide](#)
- [Request Technical Support or Training](#)
- [Register for the CAFÉ User Group](#)

## 1.10 Training & Technical Assistance

DVP provides funding for training and technical assistance with the intention of assisting domestic violence advocacy organization in Colorado to build organizational capacity to provide sustainable, survivor-defined services. The assistance is for topics such as board development, non-profit management, domestic violence best practices, policy development, and more. All training and technical assistance from the DVP-selected providers is available free of charge. Please contact DVP to learn more about how funded organizations can access free training and technical assistance.

Below is a list of technical assistance providers located in Colorado (fees may or may not apply):

- Violence Free Colorado [www.violencefreeco.org](http://www.violencefreeco.org)
- Colorado Nonprofit Association [www.coloradononprofits.org](http://www.coloradononprofits.org)

# Domestic Violence Program Funding Administration Guide

Below is a list of national technical assistance providers:

- National Network to End Domestic Violence [www.nnedv.org](http://www.nnedv.org)
- National Resource on Domestic Violence [www.nrcdv.org](http://www.nrcdv.org)
- National Center on Domestic and Sexual Violence [www.ncdsv.org](http://www.ncdsv.org)
- National Center on Domestic Violence, Trauma, & Mental Health [www.nationalcenterdvtruamamh.org](http://www.nationalcenterdvtruamamh.org)

## 1.11 Contracting

DVP contracts with each individual organization in one-year increments, which is subject to certain terms and conditions. Funded organizations that maintain full compliance may be issued an “Option Letter”, which will authorize the continuation of the contract for an additional year, for up to a total of four years. Funded organizations should not assume that funding will continue past the current year of funding.

Contracts are legally binding documents that include State-required provisions and requirements that apply to all funded organizations. Click on the link to view a [sample contract](#). In addition to the contract document itself, there are several exhibits:

1. **Statement of Work (SOW):** The SOW describes the work being completed by the organization. This document includes outcomes, activities, indicators, and timelines for the funded program. Some activities are the same for all funded organizations while some are specific to the organizations abilities and needs. DVP will provide quarterly updates for all outcomes and activities related to the contract. Click on the link to view a [sample statement of work](#).
2. **Contract Budget:** The Budget includes the line items to be charged on the DVP contract, their linkage to the SOW, and a narrative regarding cost allocation and reasoning for the items. This budget is monitored monthly via submission of the monthly reimbursements (see [Section 2.6](#) for more information). Click on the link to view a [sample budget](#).
3. **Miscellaneous Provisions:** These additional provisions are specific to DVP funding and include agreement by the funded program to abide by the DVP Funding Administration Guide, Data Reporting Requirements Guide, and more. Click on the link to view [these provisions](#).
4. **Supplemental Provisions for Federal Awards:** These additional provisions are actually notification from the State to the funded program regarding Office of Management and Budget Uniform Guidance required elements such as federal award amounts, purpose of the federal grants, etc. Click on the link to view the [sample supplemental provisions](#).

For provisions in the contract that relate to requirements regarding verification of legal presence of clients, funded organizations are exempt due to the emergency nature of domestic violence services (see CRS § 24-76.5-103). All contracts are subject to contracting regulations of the State of Colorado and internal policies of CDHS and DVP.

# Domestic Violence Program Funding Administration Guide

## 2. Financial Requirements & Reporting

### 2.1 Allowable & Unallowable Costs

#### Purpose

When awarded a contract for funding, each funded organization is required to have a contract budget, which contains the costs to be reimbursed by DVP during the course of the contract. All budgets must be approved by DVP and funded organizations must inform DVP if changes are necessary to the contract-approved budget (see the [Sample Contract Budget](#)).

#### Funded Organization Requirements

When determining allowable and unallowable costs, each DVP-funded cost must:

1. Be reasonable in scope and size in accordance with the contract award, funded program need, and other factors as determined through the request for proposal process including review and scoring.
2. Be allocable to an allowable cost as described in [Allowable and Unallowable Costs](#), conforming to limitations or exclusions.
3. Be determined in accordance with generally accepted accounting principles (GAAP) for nonprofit organizations.
4. Not be included as a cost of any other grant, fee for service, or by other means reimbursed through another entity.
5. Be adequately documented by the funded program and maintained for a period of no less than three years.

#### Definitions

Term	Definition	Source
Allowable	Expenses charged to a grant must meet the following allowability criteria: <ul style="list-style-type: none"><li>• The costs must be reasonable as determined by a prudent person.</li><li>• The costs must be given consistent treatment through application of the generally accepted accounting principles appropriate to the circumstances.</li><li>• The costs must conform to any limitations or exclusions set forth in the contract or in the <a href="#">Federal Cost Principles</a>.</li></ul>	2 CFR § 200.403
Allocable	A cost is allocable to a particular Federal award or other cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with relative benefits received.”	2 CFR § 200.405
GAAP	Generally Accepted Accounting Principles (GAAP) “has the meaning specified in accounting standards issued by the Government Accounting Standards Board (GASB) and the Financial Accounting Standards Board (FASB).”	2 CFR § 200.49

#### DVP Responsibilities

In consideration of reasonable, allowable costs, DVP uses several additional factors such as prevailing trends in the domestic violence field, CDHS contracting parameters, [Office of Management & Budget Uniform Guidance](#) (OMB Uniform Guidance), and the discretion afforded by federal agencies to states when managing federal dollars. A detailed review of examples of allowable costs is included in [the Allowable and Unallowable Costs document](#). This review may not list all allowable and unallowable costs and DVP will exercise discretion in determining allowable and unallowable costs.

# Domestic Violence Program Funding Administration Guide

## 2.2 General Budget Specifications

### Purpose

DVP funded organizations should be aware of the many factors when determining how to allocate DVP funding within their general operating budget.

### Funded Organization Requirements

1. **DVP funding is limited to no more than 50% of a funded organization's total operating budget for domestic violence services.**

For example, if the organization's total budget is \$1,000,000.00 and the domestic violence program budget is \$250,000.00, DVP funding is limited to \$125,000.00 for that program. If a funded program's operating budget fluctuates significantly enough to warrant a change in their DVP award, they are responsible for notifying DVP. DVP may need to reduce contracted dollar amounts based on total operating budgets if DVP becomes aware of changes. Funded organizations in violation of this policy may be asked to repay funding.

2. **DVP funding shall only be used for programming and services related to domestic violence.**

DVP funding shall not be used for other types of programming and services including sexual assault-specific programs, general crime victims, or homelessness programs.

3. **DVP funding used for personnel shall only be used for personnel costs related to administering, supervising, or providing domestic violence-related services and programming, or a portion thereof.**

If personnel have duties other than those associated with domestic violence programming and services, the program shall allocate only the percentage associated with the domestic violence programming. For example, the organization's Executive Director spends 35% of her time supervising the crime victim services program and 65% of her time supervising the domestic violence program. Therefore, the organization can request up to 65% of the Executive Director's for DVP funding. This must be demonstrated in job descriptions as well as time and effort reporting for staff paid with DVP funding.

4. **DVP cannot support any program area that generates a fee charged to survivors receiving the services.**

This includes token fees or minimal fees that may not cover the entire cost of a service or a program. For example, if fees are charged for counseling services, DVP funding cannot be used to pay for any part of the counseling program.

5. **DVP cannot support any program area that is also supported with reimbursed costs from victim compensation.**

If a funded program requests compensation directly and receives reimbursement, those same costs reimbursed by victim compensation cannot be supported with DVP funding.

### DVP Responsibilities

DVP will review all budgets submitted by funded organizations to ensure compliance with the above requirements and may request revisions to the budget based on allowability and allocability of expenses requested in the budget.

# Domestic Violence Program Funding Administration Guide

## 2.3 Determining Shared Cost Allocations

### Purpose

DVP funded organizations are encouraged to select one of the following methods for determining how shared costs are allocated DVP funding. A shared cost is any expense that covers more than one program area. This may include personnel who work in more than one program area or other costs such as utilities or operational costs. Large organizations with an array of community services or those that provide services to more than one population of crime victims should maintain a domestic violence services operating budget and account for domestic violence-related costs separate from the organization's total operating budget. It should be noted that DVP cannot fund any services that are related to non-intimate partner sexual assault.

### Funded Organization Requirements

There are three options for determining shared cost allocations:

1. **Number of domestic violence survivors served.**

A funded organization may determine that the DVP portion of shared expenses is based on the number of domestic violence survivors served compared to the total number of clients served by the entire organization. For example, if the funded program serves 100 people per year, and 75 of those are survivors of domestic violence, DVP funding shall, at a maximum, comprise up to 75% for any one budget item. If the funded program's total rent is \$10,000 per year, up to 75% of this cost may be allocated to DVP.

2. **DVP portion of total domestic violence services operating budget.**

A funded organization may determine that the DVP portion of shared expenses is based on DVP portion of the total domestic violence services operating budget. For example, if the total domestic violence service operating budget is \$200,000 and DVP funding is \$20,000, the DVP portion of any shared expense should be no more than 10% of the total cost. As such, if the total budget for office supplies is \$500, the DVP portion should be no more than \$50.

3. **Total domestic violence operating budget to the total organization operating budget.**

Cost allocations based on the total domestic violence operating budget relative to the total operating budget for the entire organization: A funded organization may determine that the DVP portion of the shared expenses is based on the total domestic violence operating budget relative to the total operating budget for the entire organization. For example, if the total operating budget is \$500,000 and the total domestic violence services budget is \$250,000, no more than 50% of each item in the budget should be allocated to DVP. If the total costs for rent is \$10,000, the DVP portion should be no more than \$5,000.

A funded organization may determine cost allocations based on other factors at their own discretion so long as the funded organization is able to explain the reasoning behind determining the cost allocations in the DVP budget.

### DVP Responsibilities

DVP will review all budgets submitted by funded organizations to ensure compliance with the above requirements and may request revisions to the budget based on allowability and allocability of expenses requested in the budget.

# Domestic Violence Program Funding Administration Guide

## 2.4 Indirect Costs

### Purpose

Indirect costs are those costs not readily identified with a specific project or organizational activity but incurred for the joint benefit of multiple projects and other activities. Indirect costs are usually grouped into common pools and charged to benefiting objectives through an allocation process/indirect cost rate. The purpose of this section is to provide guidance to funded programs regarding the Indirect Costs requirements.

### Funded Organization Requirements

Funded organizations may elect to charge indirect costs to DVP. Funded organizations may select a 10% De Minimis Rate, negotiate a rate with CDHS (State Negotiated Rate), or use an already Federally Negotiated Rate. An indirect cost rate is simply a device for determining fairly and expeditiously the proportion of general (non-direct) expenses that each project will bear. Funded organizations must select one of the following:

#### 1. De Minimis Rate of 10%

If the de Minimis rate is chosen, funded organizations must provide their cost allocation plan to DVP identifying the direct and indirect costs during any Financial Desk Audit (see [Section 4.8 Financial Desk Reviews](#)).

#### 2. State Negotiated Rate of anything other than 10%

If the funded organization decides that the de Minimis rate will not work, they can negotiate a rate with the State of Colorado via DVP. In order to negotiate a rate, funded organizations must submit a Negotiated Indirect Cost Rate Proposal, which includes the following documents in order to negotiate a fair and equitable rate (DVP can provide samples of any of these documents upon request):

- Transmittal letter identifying the period and rate proposed and listed the documents provided in the proposal;
- Indirect Cost Rate Proposal with a narrative, personnel costs worksheet, allocation of personnel worksheet, fringe benefits worksheet, and statement of costs;
- Organization Chart;
- Statement of Certification;
- Independent Financial Audit Report or Audited Financial Statements;
- Cost Policy Statement; and,
- Grant and Contract List

#### 3. Federally Negotiated Rate

If the funded organization has negotiated with a federal entity for an indirect rate, a copy of the letter from the federal entity will need to be submitted to DVP which should include the type of rate negotiated, the effective period, the rate expressed as a percentage, and how the rate was developed.

#### 4. Direct allocation of expenses

A funded organization may choose to not include indirect costs in the budget and directly allocate all costs.

# Domestic Violence Program Funding Administration Guide

## DVP Responsibilities

For all indirect costs, DVP will follow the CDHS Internal Indirect Costs Policies and Procedures for monitoring and negotiating. DVP is required to review indirect cost allocation plans for funded organizations who have selected to use the de Minimis Rate of 10% for indirect costs. DVP is required to negotiate a rate with funded organizations who do not select the de Minimis Rate, who do not have a Federally Negotiated Rate and who do not wish to allocate costs directly. DVP will then monitor indirect costs for these State Negotiated Rates during Financial Desk Audits. If funded organizations have a Federally Negotiated Rate, DVP will review the letter from the federal government regarding the Federally Negotiated Rate.

## 2.5 Required Match

### Purpose

Per 42 U.S.C. 10406(c)(4) (FVPSA), all organizations funded by DVP are required to provide documentation of the availability of matching funds. This requirement establishes the organization's ability to sustain programming and services for domestic violence survivors and their families.

### Funded Organization Requirements

#### *Allowable match sources include:*

1. In-kind contributions including volunteer hours, donations of goods such as equipment or supplies, donated office space, or professional services. The value placed on donated services must be consistent with compensation for similar work or goods at fair market value. If using volunteer hours, applicants must use timesheets to document hours. The hourly value for volunteers should be reasonable.
2. Cash match must be from non-federal sources such as local VALE, United Way, or private foundations.
3. Corporate matches of \$1,000.00 or more from businesses.

#### *Unallowable match sources include:*

1. Federal funding such as Victims of Crime Act (VOCA) or Violence Against Women Act (VAWA), as administered by the Colorado Crime Victim Services Board at the Division of Criminal Justice.
2. Fundraising dollars and contributions or gifts of less than \$1,000.00 such as donor appeals and money raised from special events.

#### *Documentation of Matching Funds*

Organization are required to provide proof of matching funds and may not use their DVP-designated match monies as a match for any other grant or funding source. The matching source becomes part of the contract for funding, which prohibits using those dollars/contributions to match other organizations. Examples of this documentation include:

- Copies of checks used for deposit
- Award letters
- Bank statements
- Volunteer timesheets (see [Section 3.7 Personnel and Volunteer Requirements](#) for information on volunteer timesheet requirements)

## DVP Responsibilities

DVP will review all match calculations for accuracy as well as review all match documentation with the submission of the annual Year-End Narrative.



# Domestic Violence Program Funding Administration Guide

## 2.6 Reimbursement of Expenses

### Purpose

All funded organizations are required to submit monthly financial reimbursement requests to DVP for contracted expenditures (see the [Sample Reimbursement Request](#) for more information). All funds must be expended within the contract year. To learn more about the reimbursement process for DVP, please view this [Financial Reporting webinar](#).

### Funded Organization Requirements

Funded organizations must follow these requirements:

1. Expenditures must be based on expenses incurred during the DVP contracted Fiscal Year (October 1 - September 30).
2. Request for reimbursement shall only occur after the funded organization incurs the expenditure.
3. Reimbursements are subject to DVP review and approval before payment is issued.
4. The accuracy of reported information on the form is the sole responsibility of the funded organization.
5. Only one individual from the organization shall be designated to sign reimbursement forms for DVP and they must ensure the accuracy of the information reported to DVP prior to submission (see [Section 1.8 Contact Information Form](#) for information on how to designate an individual to sign the reimbursement form).
6. When a new employee moves into a position paid by DVP, funded organizations must change the employee name on the Invoice tab in the DVP Budget Tracking Form for the appropriate line and reporting period.
7. Back-up documentation must be kept for minimum of three years. See below for additional information regarding acceptable back-up documentation for expenses.

All funded organizations are required to follow the process outlined below to receive payment:

1. The DVP Budget Tracking Form Invoice Tab for the contract year must be used each month (download the [DVP Budget Tracking Form](#) for more information). DVP will send the form that must be used for the entire contract period to the funded organizations at the beginning of the contract year. For organizations receiving continuing funding from DVP, the form will be sent after the final reimbursement for the previous contract year is submitted and approved and the program is in good standing.
2. The form must be signed and dated by the authorized individual after the end of the reporting period (see [Section 1.8 Contact Information Form](#) regarding who is authorized to sign reimbursements).
3. The signed and dated reimbursement form is due on the 20<sup>th</sup> of each month. For example, when requesting reimbursement for November expenses, the form is due no later than December 20<sup>th</sup>.
4. One-time extensions may be granted for late submission of the form on a case-by-case basis. To request an extension, send an email to the DVP staff liaison with the proposed submission date prior to the 20<sup>th</sup> of the month.
5. DVP will only accept scanned electronic copies of the form submitted via the CAFÉ (see the [Quick Tip Guide for submitting the Monthly Reimbursement in CAFÉ](#)).
6. Notify DVP staff immediately upon changes to banking information to ensure timely payment via electronic funds transfer (EFT) (see the [Electronic Funds Transfer Form](#)).
7. Back-up documentation is not required to be submitted when requesting monthly reimbursement. DVP will request back-up documentation during a Financial Desk Review, or at other times when deemed necessary such as a site visit or monthly (see [Chapter 4 Monitoring Requirements](#)).

# Domestic Violence Program Funding Administration Guide

## DVP Responsibilities

DVP will review all invoices submitted by the funded organization for the following elements:

1. Correct reporting period selected on form - for example, if the invoice is submitted in February, the reporting period selected should be for January.
2. The authorized individual has signed and dated the form.
3. The date of signature is after the end of the reporting period. For example, for the January reimbursement, the signature must be dated as February 1<sup>st</sup> or later.
4. Accuracy in all figures entered including totals. For example, if the total for personnel on the invoice is \$1,802.01 then all of the lines items in the personnel section must add up to \$1,802.01.
5. No amount requested is over the budgeted amount for the line item. For example, if there is \$2,500 budgeted for an Audit, only \$2,500 may be requested for the entire year on that line.

If there are any errors, DVP will send the form back to the funded organization for corrections and a deadline to resubmit. DVP will submit the accurate invoice to CDHS accounting for processing of the payment within seven days. Per CRS §24-30-202(24)(a) the State has 45 days to issue payment without penalties, once DVP has received the accurate invoice.

## 2.7 Back-Up Documentation – Timesheet Requirements

### Purpose

Per OMB Uniform Guidance (2 CFR §200.430), any charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. See the [DVP Template Policy - Time and Effort Reporting](#).

### Funded Organization Requirements

The following elements must be included on each timesheet of staff funded in whole or in part by DVP:

- Full name of employee
- Employee’s job title/position
- Dated signature of employee
- Pay period dates
- Log of activities performed each day
- Percentage of time billed/allocated to all funding sources
- Attestation that time worked is true and correct
- Dated signature of supervisor
- Number of hours worked each day during the pay period including all types of leave and holidays

Timesheets must be maintained by the funded organization and will be reviewed during site visits and / or financial desk reviews or at any other time as determined necessary by DVP. Timesheets must be an after-the-fact determination of the actual activity and hours of each employee - estimates are not allowed (download the [Timesheet Template](#) and the [DVP Template Policy - Time and Effort Reporting](#) for more information).

If 100% of the activities performed by an employee are DVP allowable, the employee may complete a time certification form in lieu of activity reporting. The certification must be signed at least quarterly by the employee’s supervisor to verify that 100% of the activities performed by the employee are allowable by DVP (see the [Quarterly Time Certification Template](#)). Allowable activities include duties performed that relate to domestic violence services. An employee does not have to be 100% funded by DVP to be eligible to use the time certification in lieu of the activity

# Domestic Violence Program Funding Administration Guide

reporting. An employee that performs duties related to non-intimate partner sexual assault, other crime victims or unallowable activities such as fundraising must complete activity reporting. These certifications must be kept with the employee's timesheets.

## **Other Requirements**

1. It is recommended that employees record their time daily and document activities performed.
2. Supervisors must have firsthand knowledge of the employee's activities when signing a timesheet.
3. Timesheets must be prepared and signed off on for both employees and supervisors prior to any payment to the employee. At a minimum, timesheets can be prepared monthly and may correspond to one or more pay periods as long as there are internal controls that ensure there are no estimates on actual time worked for both pay periods.
4. Accounting staff should make the determination of the percentage of time billed to each funding source, which should be documented on the timesheet or tracked via another method.

## **DVP Responsibilities**

DVP is required to review time and effort reporting. This will generally be conducted during a Financial Desk Review (see section [4.8 Financial Desk Reviews](#) for more information). Generally, DVP will look to ensure all above elements are included on the documentation provided to DVP.

## **2.8 Back-Up Documentation – Other Requirements**

### **Purpose**

DVP funded organizations must maintain backup documentation for all other expenses on the DVP contract.

### **Funded Organization Requirements**

Documentation for expenses could include, but is not limited to:

- Receipt or cancelled check verifying payment of employment taxes.
- Receipt or cancelled check verifying worker compensation insurance.
- Itemized receipts for office supplies, program supplies, food, household items, etc.
- Invoices for contracted professional services.
- Receipt or cancelled check verifying payment of unemployment taxes.
- Receipt or cancelled check verifying other employee benefits and taxes.
- Invoices/bills for utilities, communications, or other reoccurring or one-time expenses.
- W-9s and board-approved contracts for professional services.

All backup documentation must be maintained by the funded organization and will be reviewed during financial desk reviews or at any other time as determined necessary by DVP (see [Section 4.8 Financial Desk Reviews](#)).

### **DVP Responsibilities**

DVP is required to review all back-up documentation for expenses reimbursed by DVP. This includes:

1. All receipts and invoices are dated and itemized.
2. DVP was not charged any late fees or taxes, other than taxes which the organization is legally required to pay.

# Domestic Violence Program Funding Administration Guide

3. The documentation provided for expenses match the invoice(s) submitted to DVP.
4. For any professional services, DVP will review the engagement letter or contract for services for terms, timeline, and board approval, if required per the funded program's internal approval process.

## 2.8 Budget Modifications

### Purpose

Funded organizations may request a modification to their current, contracted Final Budget using the process outlined below.

### Funded Organization Requirements

1. All budget modifications must be requested via the Budget Modification Request Form tab included in the DVP Budget Tracking Form provided by DVP (see the [Sample Budget Modification Request](#) tab).
2. Within the Budget Modification Request Form, provide the amounts to be reduced (e.g., \$480.00) and the amounts to be increased (e.g., \$480.00) in the Amount Increase / Decrease column for each line requiring a modification. All requests must be accompanied with an explanation regarding why the modification is necessary in the Justification column on the Budget Modification Request Form.
3. DVP must receive budget modification requests within ten calendar days of the contract end. For example, if the contract ends September 30<sup>th</sup>, requests must be received no later than October 10<sup>th</sup>. Back-up documentation for all expenses will be requested for any budget modifications requested after October 1<sup>st</sup>.
4. If the budget modification will trigger a contract amendment (see below), budget modification requests must be made by August 1<sup>st</sup> for contracts ending September 30<sup>th</sup>.
5. Requests must be emailed to the funded organization's DVP liaison in Excel format (PDFs will not be accepted).

### Limitations

1. Funded organizations may request one budget modification per year. Additional modifications may be requested and approved on a case-by-case basis with DVP approval. If a funded organization requests more than one budget modification for the contract year, an additional financial desk review may be conducted in the current or subsequent contract year.
2. All requests must be in accordance with allowable DVP costs. For example, each contract is limited to a total of \$10,000 in professional services (see [Appendix C - Allowable and Unallowable Costs](#) for more information).
3. Funded organizations may move funding amounts from one line item to another within the contracted budget. For example, if the contracted budget is \$10,000 for Advocate Salary and \$800 for office rent, the request may be to reduce the Advocacy Salary line to \$9,000 and increase the office rent line to \$1,800.
4. Funded organizations may request to add a new allowable line item by reducing current line items to add to the new line. For example, if the contracted budget is \$10,000 for Advocate Salary and the program needs to add a line for office rent, the program may reduce the Advocate Salary line to \$9,000 and add a new line for office rent in the amount of \$1,000.
5. Any budget modification request that 1) adds one or more new budget line item(s) to the contracted budget; and 2) moves more than \$10,000 or 10% of the total award, whichever is greater, to the new line or lines may require a formal contract amendment subject to DVP and CDHS approval and discretion. This process can take 60 days or longer for official approval.
6. Modifications will be granted to those that demonstrate sound management of contract dollars, compliance with existing rules, and those that do not change the total dollar amount of the existing contract.

# Domestic Violence Program Funding Administration Guide

7. Requests for modifications that increase or decrease the total contract amount will not be considered. Funded organizations must spend down the total amount of the contract exactly within the contract year.
8. Requests for modifications that attempt to extend the date of contract will not be considered. All contracted dollars must be expended within the original contract dates.
9. Funded organizations are responsible for maintaining appropriate financial back-up documentation.
10. If DVP finds, through the course of a Financial Desk Review, Audit, or Site Visit that a funded organization does not have proper back-up documentation or has unallowable costs, a funded organization may be required to submit a budget modification and/or face possible reduction in their awarded amount.
11. If a funded organization wishes to change the number of months a position is funded, they must inform DVP in writing. For example, if the original contract states that 12 months of salary will be paid and the funded program has a change in staffing that creates 2 months of vacancy in that position, the full amount allocated to the line is permitted to be spent down in 10 months as long as DVP is notified of the change (which can be done via an email as no formal budget modification is required).
12. If a funded program spends down a line item prior to the end of the contract, the program is still responsible for the delivery of services and reporting requirements of DVP. For example, if a program spends down a budgeted employee salary in August, the program must still provide the services indicated in the contract and report on those services to DVP through September.

## **DVP Responsibilities**

1. DVP will review the submitted Budget Modification Request within three (3) business days and inform the organization of approval or may request additional information if needed.
2. DVP will send a revised DVP Budget Tracking Form after the modification has been approved that must be used for all future reimbursement requests.

## 3. Programmatic Requirements

### 3.1 Purpose of Programmatic Requirements

The Colorado Department of Human Services is the designated State agency with the authority to establish State Standards for organizations providing domestic violence advocacy services. Per C.R.S26-7.5-104., (2) (a), “The state department [CDHS] shall establish, by rule, and enforce standards and regulations for all domestic abuse programs established pursuant to this article and shall require that each such domestic abuse program meets approved minimum standards as established by rule.” These State Standards serve as minimum requirements for organizations providing domestic violence services including minimum standards for operations that promote sustainability and sound management. Additionally, they establish best practices for the delivery of survivor-defined advocacy that is accessible, culturally-relevant, and trauma-informed. DVP monitors for compliance with the State Standards on a routine basis, which includes an on-site review at least once every four (4) years. The [State Standards](#) were most recently modified on October 1, 2018.

In addition to the State Standards, funded organization must also adhere to [Federal Requirements](#) as established by the U.S. Department of Health and Human Services, Administration for Children & Families, Family and Youth Services Bureau. These Federal Requirements were most recently adopted on January 1, 2016.

The following sections include information directly from the DVP State Standards as well as information on the organizational requirements for meeting each standard and the DVP responsibilities for those requirements.

### 3.2 State Standards and Federal Requirements

#### Funded Organization Requirements

Funded organizations must ensure that they adhere to all State Standards and Federal Requirements and show verification of the requirements. This includes, but is not limited to:

1. Written policies that meet minimum requirements.
2. Implementation of required policies on a consistent basis.
3. Training for staff and volunteers related to policies.
4. Implementation of best practices that promote domestic violence survivor well-being including services that are accessible, culturally-relevant, and trauma-informed.
5. Modifications to policies that are not fully compliant.
6. Seeking training and technical assistance to attain full compliance with all requirements.

#### DVP Responsibilities

1. DVP will monitor all organizations to verify compliance including on-site visits at least once every four years and more often if necessary.
2. DVP will provide template policies for required written policies.
3. DVP make available training and technical assistance opportunities.

#### Policy Templates

# Domestic Violence Program Funding Administration Guide

DVP has policy templates available for many of the required policies. These policies are available to download on the DVP website ([www.colorado.gov/cdhs/dvp](http://www.colorado.gov/cdhs/dvp)). The [Using DVP Policy Templates](#) document can be helpful to navigate through the DVP rules and corresponding templates.

## 3.3 Confidentiality Requirements

### Purpose

DVP strives to ensure survivors of domestic violence who receive services at DVP-funded organizations will have their personally identifiable information kept private and confidential in accordance with State Standards and Federal Requirements.

### Funded Organization Requirements

Funded organizations must have written confidentiality policies which include:

Policy	Requirements	Basis
Training / Personnel	All employees and volunteers who provide domestic violence advocacy or have access to personally identifying client information will receive 15 or more hours of domestic violence-related training prior to providing advocacy or have access to the information.	DVP Rule 12.201.2, A.
Document Retention and Destruction	Protection of confidential client communications including case file records, electronic records, electronic communications with clients (e-mail and text messages), client meeting notes, communications through an interpreter, and any other documents or materials.	DVP Rule 12.201.2, B.
Confidentiality for Advocates	Release of confidential client records to a third party when the client has given consent, response to a subpoena, mandatory reports of child maltreatment, and responses within confidentiality when client is unable to grant consent to summon emergency medical services, client is determined to pose a danger to self or other, known or suspected client criminal activity or behavior, law enforcement request for residential facility access to serve a warrant or subpoena on a client, and working with county or court officials.	DVP Rule 12.201.2, C., D., and E.
Confidentiality for Other Professionals	Establish a separate set of confidentiality, mandatory reporting, and duty to warn parameters for employees or volunteers acting within other professional standards.	DVP Rule 12.201.2, F.
Client Rights	Access to client records, informed consent, limits of confidentiality	DVP Rule 12.202.3, B.

### DVP Responsibilities

1. DVP will provide template forms and policies for all DVP requirements listed in rule.
2. DVP will conduct regular monitoring to review all required policies and practice related to confidentiality.

## 3.4 Data Reporting Requirements

### Purpose

# Domestic Violence Program Funding Administration Guide

Per DVP Rule 12.201.3, all programs funded by DVP shall submit regular reports to DVP per contract requirements to minimally include but not be limited to federally required data and data required by Section 26-7.5-104 (2) (B), C.R.S. Funded programs must collect ALL information related to all domestic violence services, including program components that are not funded by DVP and follow the requirements outlined in the [DVP Data Reporting Requirements Guide](#).

## Funded Organization Requirements

Funded organizations must have the following:

1. Client files that include:
  - Demographic information
  - Service contacts provided to clients
  - Documentation of safety planning being made available to clients
  - Referrals to other services
  - Documentation of needs / safety assessment being completed
  - TANF eligibility
  - Notification of funded organization policies (i.e., confidentiality and/or clients' rights)
2. Other data records such as crisis call logs, community education lists, volunteer hours, etc.
3. Method for submitting data reports to DVP according to the schedule set by DVP (see the [DVP Data Reporting Requirement Guide](#) for more information).
4. A written document retention and destruction policy stating that all records and reports will be kept for a minimum of three years after the end of the contract period unless otherwise required.

For more information on data reporting requirements, please go to the [DVP Data Reporting Requirements Guide](#).

## DVP Responsibilities

1. DVP will provide template forms and policies for all DVP requirements listed in rule.
2. DVP will review quarterly data reports and provide feedback to funded organizations as needed.
3. DVP will conduct regular monitoring to review all required policies, training, and practice related to reporting including a review of redacted client files and other client-related documents.

## 3.5 Financial Policy Requirements

### Purpose

Per DVP Rule 12.201.4.A, funded organizations shall demonstrate sound fiscal management as evidenced by written fiscal policies and procedures in accordance with generally accepted accounting principles (GAAP), approved and reviewed by the governing body that demonstrate sound fiscal controls and sufficient assurances to protect against theft or embezzlement.

## Funded Organization Requirements

Funded organizations should have the following policies in place to demonstrate sound fiscal management:

1. Separation of duties
2. Staff expense reimbursement (i.e., travel)
3. Employee credit card usage
4. Accounts payable procedure
5. Procurement policies



# Domestic Violence Program Funding Administration Guide

6. Policy for preparing and reviewing the financial statements and/or reports
7. Governing body approval of the annual budget
8. Organization asset policy (i.e., computers, cellphones, etc.)
9. Petty cash policy
10. Gift card policy
11. Policy regarding expenses paid on behalf of clients (i.e., gas, food, etc.)
12. Policy requiring management to approve / authorize prior to issuing payments

## 3.6 Governing Body Requirements

### Purpose

Per DVP Rule 12.201.5, funded organizations must have a governing body such as a board of directors, advisory board or Tribal Council to ensure that the funded program exercises sound ethical legal governance and financial management. The funded organization should make every effort to recruit and maintain membership that reflects the racial, ethnic, economic, and social composition of the community or region to be served, including former clients of the program(s) and/or persons who have experienced domestic violence.

### Funded Organization Requirements

Funded organizations should have the following documents regarding Governance of their program:

1. Governance membership roster with membership affiliations and terms
2. Bylaws or other governing documents
3. Conflict of Interest Policy including frequency of disclosure
4. Governance meeting minutes that tracks decisions made, review and acceptance of the financials, and review and approval of previous meeting minutes.

### DVP Responsibilities

1. DVP will provide template forms and policies for all DVP requirements listed in rule.
2. DVP will conduct regular monitoring to review all required policies, training, and practice related to governance including interviewing a member of the governing body during site visits.

## 3.7 General Operations & Administrative Requirements

### Purpose

Per DVP Rule 12.201.6, funded organizations should have sound administrative policies and procedures to ensure the safety and security of employees, volunteers, and clients.

### Funded Organization Requirements

Funded organizations should have the following written policies or procedures:

1. Disaster management plan
2. Safety policies and procedures to minimize risk (which should include potential breaches of safety at each service location)
3. Lobbying, political activity, and public demonstration policy (to include that these activities may not be paid for with DVP funding)

# Domestic Violence Program Funding Administration Guide

---

Additionally, funded organizations must have a process to complete [fire safety inspections](#) for residential facilities, a [certificate of occupancy](#), and [water safety inspections](#) if the potable water used in the residential facility is from a non-public source.

# Domestic Violence Program Funding Administration Guide

## DVP Responsibilities

1. DVP will provide template forms and policies for all DVP requirements listed in rule.
2. DVP will conduct regular monitoring to review all required policies and practice related to general operations and administrative requirements.
3. DVP will follow the protocols listed in this document for fire safety inspections, certificates of occupancy, and water safety inspections.

## 3.8 Personnel Requirements

### Purpose

Per DVP Rule 12.201.7, funded organizations must have written personnel policies approved by the governing body.

### Funded Organization Requirements

Funded organizations should minimally have the following written personnel policies:

1. Ethics policy
2. Equal employment opportunity hiring policy
3. Whistleblower policy
4. Harassment free workplace
5. Employee grievance policy
6. Criminal background check policy
7. Drug-free workplace policy
8. Annual performance reviews of employees

Funded organizations must have written job descriptions for all employees funded wholly or in part by DVP. In some cases, these job descriptions should minimally include assurances that employees who are serving as licensed or unlicensed counselors or social workers maintain appropriate licensure as required by law and/or registration with the Colorado Department of Regulatory Agencies.

Funded organizations must also maintain personnel records for employees that include the following:

1. Employee resume / Application
2. Documentation of 15 hours of pre-service training
3. Documentation of ongoing training
4. Criminal background check results
5. Wage rate and benefits
6. Documentation of ability to legally work in the US (E-Verify or Department Program)
7. Performance reviews
8. Signed Confidentiality Statement
9. Signed verification of receipt of personnel handbook
10. Insurance verification & Driver's license if employee uses personal or program-owned vehicle for business

## DVP Responsibilities

1. DVP will provide template forms and policies for all DVP requirements listed in rule.
2. DVP will conduct regular monitoring to review all required policies and practice related to personnel policies including a review of a personnel file for employee(s) funded by DVP.

# Domestic Violence Program Funding Administration Guide

## 3.9 Volunteer Requirements

### Purpose

Per DVP Rule 12.201.8, funded organizations must have written volunteer policies to minimally include oversight of volunteer activities.

### Funded Organization Requirements

Funded organizations should have volunteer policies that minimally include the following:

1. Ethics policy
2. Whistleblower policy
3. Harassment free volunteer environment
4. Volunteer grievance policy
5. Criminal background check policy
6. Drug-free work environment policy
7. Reviews of volunteer performance

Funded organizations must also keep records for all volunteers to include:

1. Application / resume to volunteer
2. Documentation of 15 hours of pre-service training
3. Documentation of ongoing training
4. Criminal background check results
5. Signed confidentiality statement
6. Performance reviews
7. Insurance verification & Driver's license if volunteer uses personal or program-owned vehicle for business

Funded organizations must have written job descriptions for all volunteer positions at the organization. All funded organizations are required to track the number of volunteers working at the organization as well as the number of hours the volunteers work on domestic violence-related projects (i.e., crisis lines, advocacy, court accompaniment, administration, etc.). The following must be kept by the funded program to verify any volunteer hours:

- Volunteer name
- Dates and times of hours worked during the reporting period
- Volunteer signature
- Reporting period
- Attestation
- Date of signature

### DVP Responsibilities

1. DVP will provide template forms and policies for all DVP requirements listed in rule.
2. DVP will conduct regular monitoring to review all required policies and practice related to volunteer policies including a review of a volunteer file and volunteer timesheets.

## 3.10 Community Services

### Purpose

Per DVP Rule 12.201.9, organizations shall make every effort to provide community education presentations, awareness opportunities, prevention activities, training and technical assistance on subject-matter expertise, and collaborative efforts to increase coordination and avoid duplication of services in their region of service provision.

# Domestic Violence Program Funding Administration Guide

## Funded Organization Requirements

Funded organizations must track all community education presentations, awareness opportunities, prevention activities, etc. to report to DVP via the Quarterly Data Report.

## DVP Responsibilities

1. DVP will provide template forms and policies for all DVP requirements listed in rule.
2. DVP will conduct regular monitoring to review all required policies and back-up documentation for the provision of community services.

## 3.11 Crisis Response Services

### Purpose

Per DVP Rule 12.202.2, all funded organizations must provide free and confidential emergency and crisis response services.

### Funded Organizations Requirements

Funded organizations must have the following:

1. A crisis line accessible to the local community 24/7 that allows for callers to use a blocked line
2. A language access policy and procedure to provide services to callers with limited English language proficiency or who are deaf or hard of hearing
3. Trained employees or volunteers in accordance with DVP Rule 12.201.2 (see [Section 3.2 Confidentiality Requirements](#) for more information) who are able to respond to calls 24/7

If a funded program does not have a crisis line, they must have the following:

1. Coordination of crisis line services through a formal memorandum of understanding with a DVP-funded program in good standing that serves the same region and provides the above services.
2. A language access policy and procedure to provide services to callers with limited English language proficiency or who are deaf or hard of hearing

## DVP Responsibilities

1. DVP will provide template forms and policies for all DVP requirements listed in rule.
2. DVP will conduct regular monitoring to review all required policies and practices for the provision of crisis services.

## 3.12 Domestic Violence Victim Advocacy Services

### Purpose

Per DVP Rule 12.202.3, all funded organizations must provide domestic violence advocacy that is free, voluntary, without requirements or conditions and by trained employees and volunteers.

### Funded Organization Requirements

Funded organizations must minimally have the following:

# Domestic Violence Program Funding Administration Guide

1. Written policies to ensure domestic violence advocacy meets the minimum standards listed in rule.
2. A written document that establishes client rights that is provided to the client upon intake into the program.
3. Written policies that describe eligibility, language access, creating an environment that is accessible, culturally relevant, and trauma-informed, transportation and child care.

## DVP Responsibilities

1. DVP will provide template forms and policies for all DVP requirements listed in rule.
2. DVP will conduct regular monitoring to review all required policies and practices for the provision of domestic violence victim advocacy services.

## 3.13 Residential Domestic Violence Victim Advocacy Services

### Purpose

In addition to the requirements listed above, funded organizations that offer residential services (including temporary, short or long-term overnight accommodations at a facility maintained, operated, and/or paid for by a DVP-funded program such as a shelter, safehome, transitional housing unit, motel, or hotel) must adhere to DVP Rule 12.202.4.

### Funded Organization Requirements

Funded organizations must minimally have the following:

1. Notification process for new or relocated residential facilities and permanent or temporary closures of residential facilities.
2. Screening process, safety plan strategies for people staying in confidential facilities, non-mandated services, and maintaining quality and safety living conditions.
3. Ability to provide services to residential clients 24/7 (Note: it is not required to have employees or volunteers on site 24/7).
4. Written expectations for residential clients including voluntary provision of housekeeping duties, voluntary participation in services, involuntary exit criteria, ability to lock personal valuables, use of legal substances, and safety protocols.

Residential facilities run by funded organizations must also have:

1. Separate bedrooms for each family (when feasible)
2. Private space for bathing
3. Space for quiet time
4. Free food, clothing, and other basic needs
5. Unrestricted telephone access for emergencies
6. Laundry facilities
7. Access for service animals
8. Marked and posted evacuation routes and exits
9. Functional heating, cooling, and ventilation systems

### DVP Responsibilities

1. DVP will provide template forms and policies for all DVP requirements listed in rule.
2. DVP will conduct regular monitoring to review all required policies and practices for the provision of domestic violence victim advocacy services in residential facilities including shelter tours as feasible.

# Domestic Violence Program Funding Administration Guide

## 3.14 Domestic Violence Victim Advocacy Services for Children & Youth

### Purpose

Per DVP Rule 12.202.5, funded organizations shall make every effort to make developmentally appropriate services for children and youth available to include advocacy, individual and group counseling, information and referrals, safety planning, and other supportive services.

### Funded Organization Requirements

Funded organizations must minimally have the following:

1. Written policies and procedures for providing services to children and youth in residential facilities that include specific training for employees and volunteers, voluntary intakes and assessments for children and youth, confidentiality parameters, accommodation for teenagers of all genders and adult dependent children, and access to play spaces.
2. Written policies and procedures for providing services to children and youth in non-residential services that include specific training for employees and volunteers, voluntary intakes and assessments for children and youth and confidentiality parameters.
3. Written policies and procedures for providing services to youth teen dating violence clients that include specific training for employees and volunteers, voluntary intakes and assessments, and confidentiality parameters (which include the age of consent for confidential services without parental consent).

### DVP Responsibilities

1. DVP will provide template forms and policies for all DVP requirements listed in rule.
2. DVP will conduct regular monitoring to review all required policies and practices for the provision of domestic violence victim advocacy services for children and youth.

# Domestic Violence Program Funding Administration Guide

## 4. Monitoring Requirements

### 4.1 DVP Monitoring Plan

#### Purpose

As good stewards of public funds, DVP must evaluate and monitor DVP funded organizations' compliance with Federal Rules, State Standards, and other requirements. The purpose of monitoring is to confirm that funded organizations' maintain compliance and use public funds for allowable activities and achievement of performance goals. Per the CDHS Audit Division, DVP must also use monitoring activities in consideration of creating plans for helping organizations attain compliance as needed (2 CFR §200.331 (d) and (h)). Additionally, monitoring is also used as a way for DVP to provide organizations with the resources, training and technical assistance they need to be successful.

Monitoring of funded organizations may include, but is not limited to, the following:

1. Reviewing back-up financial documentation for expenditures made on the contract;
2. Affirming compliance with Federal Rules and State Standards;
3. Following-up and ensuring that the funded program takes timely and appropriate action on all deficiencies pertaining to the contract;
4. Issuing reports for completed Site Visits, Financial Desk Reviews, Data Desk Reviews, or other monitoring activities pertaining to the contract to the funded program; and
5. Reviewing State-negotiated cost allocation plans / indirect cost rates, as needed.

Funded organizations must complete the [Subrecipient Performance Report and Assessment](#) prior to the start of a contract and annually thereafter which will inform the frequency and intensity of the monitoring DVP will conduct for each organization. DVP may adjust monitoring activities based on DVP's capacity, priorities, and other factors. DVP will conduct the following activities as needed for funded organizations. Funded programs have the right to select the timing of monitoring activities, within certain parameters.

#### Definitions

1. **Intervals:** How often the monitoring activity will be conducted (quarterly, annually, every four years, etc.)
2. **Intensity:** How intensive the monitoring activity will be. The intensity definitions will vary within each type of monitoring activity.
3. **Methods:** How monitoring activities can be conducted with a funded organization:

<b>On-Site</b>	Monitoring occurs at the funded organization, which may include submitted electronic materials prior to visiting on-site
<b>Desk</b>	Monitoring occurs at the DVP office via a review of submitted electronic materials
<b>1:1 Meeting</b>	Monitoring occurs via 1:1 meetings with DVP either in person or virtually
<b>Year-End Report</b>	Monitoring occurs via the FVPSA Year-End Report that is required to be completed by organizations after the end of the contract year

**Risk Levels:** Risk levels are determined at the start of every contract year per Federal Office of Management and Budget (OMB) requirements. CDHS created a Risk Assessment ([Subrecipient Performance & Assessment Report](#)) that funded organizations have been completing annually since FFY17 as part of the contracting process. The risk levels of low, medium, and high come from the responses to the assessment in a formula created by the CDHS Audit Division.



# Domestic Violence Program Funding Administration Guide

For some funded organizations at higher risk levels, or based on other factors as determined by DVP as identified below, DVP may increase the interval or intensity of any monitoring activity. For example, a funded organization may be required to submit back-up financial expenses documentation to DVP on a monthly basis to be reviewed prior to payment. DVP may also use the following factors to continually evaluate the level of monitoring required. DVP may increase monitoring as a result of lack of timely responsiveness to requests from DVP, leadership changes, lack of consistent data submissions, multiple requests for budget modifications, formal client complaints, opening a new shelter facility, etc.

## Monitoring Activities

For all funded organizations, the following monitoring activities will be conducted to the best of DVP's ability:

Activity	Interval	Intensity	Method	DVP Position Responsible	Reference
Certificate of Occupancy	Once	Low	Desk	Program Assistant	DVP Rules
Data Reporting	Quarterly	Low	Desk	Data Specialist	DVP Rules, FVPSA
General Compliance Tracking re: general liability insurance, fire safety inspections, independent audit/financial reviews, water safety inspections	Annually	Low	Desk	Program Assistant	DVP Rules
Matching Funds Documentation Review	Annually	Low	Year-End Report	Specialists	OMB Universal Guidance
Conformity with DVP Rules	Annually	Low	Year-End Report	Specialists	DVP Rules
Discussion re: ACRTI, Data Collection, Innovations, Non-Profit Management	Once every 4 years	Medium	On-Site	Specialists	DVP Rules
Financial Backup Materials Review	Once every 4 years	Variable*	Desk	Specialists	DVP Rules, OMB Universal Guidance, CDHS contracting requirements
Data Quality Assurance	Once every 4 years	Variable*	Desk	Specialists	DVP Rules
Contract Performance, organization needs	Once every 4 years	Low	1:1 Meeting	Specialists	DVP Rules

\* DVP may increase the level of intensity based on the organization needs.

Additional descriptions of the activities are included throughout this chapter.

If DVP identifies any deficiencies with a funded organization regarding the contract, DVP will follow the [Compliance Tracking Protocol](#) to ensure that the funded organization takes timely and appropriate action.

# Domestic Violence Program Funding Administration Guide

## 4.2 Certificate of Occupancy

### Purpose

Per DVP Rule 12.201.6 E., all DVP-funded organizations with a residential shelter facility must have documentation of a Certificate of Occupancy in accordance with local zoning for all program locations to verify the number of individuals who may reside in the shelter at any given time.

### Funded Organization Requirements

1. Funded organizations should submit their Certificate of Occupancy via email to the DVP Program Assistant ([Melissa.Snider@state.co.us](mailto:Melissa.Snider@state.co.us)).
2. The Certificate of Occupancy will only have to be provided once and will only need to provide updated information if anything changes in that documentation (e.g., occupancy changes from 15 to 12 based on new zoning requirements).

### DVP Responsibilities

1. Maintain a record for each funded organization regarding certificate of occupancy within the CAFÉ;
2. Follow the [Compliance Tracking Protocol](#).

## 4.3 General Liability Insurance

### Purpose

Per CDHS contract provision 12.B, all DVP-funded programs are required to maintain General Liability Insurance. Commercial general liability insurance should cover premises operations, fire damage, independent contractors, products and completed operations, blanket contractual liability, personal injury, and advertising liability.

### Funded Organization Requirements

1. Maintain general liability insurance coverage of \$1,000,000 or more.
2. Include automobile insurance if staff or volunteers use their own or agency-owned vehicles in the course of normal business operations and/or the program transports clients.
3. List “State of Colorado” at 1575 Sherman Street, Denver, CO 80203 as the Certificate Holder or Other Insured.
4. Show proof of coverage annually by submitting the copy of the certificate (must be on an Insurance Services Office occurrence form) to the DVP Program Assistant via email ([Melissa.Snider@state.co.us](mailto:Melissa.Snider@state.co.us)) prior to expiration.

### DVP Responsibilities

1. Maintain a record for each funded organization regarding proof of insurance within the CAFÉ and supply documents to CDHS Contracts Management as requested.
2. Follow the [Compliance Tracking Protocol](#).

# Domestic Violence Program Funding Administration Guide

## 4.4 Annual Fire Safety Inspection

### Purpose

Per DVP rule 12.201.6, all DVP-funded organizations with a residential shelter facility are required to operate and maintain a safe shelter facility. This includes obtaining an annual fire safety inspection from a local fire department or agency authorized to enforce the local fire code.

### Funded Organization Requirements

1. The fire safety inspection must be completed annually and minimally include:
  - Date of the inspection
  - Signature from an authorized official of the local fire department
  - Documentation of the items reviewed in the inspection
  - Any areas in need of attention or unsafe items
2. Funded organizations must show proof of the annual fire safety inspection by submitting documentation to DVP via the CAFÉ (see the [Quick Tip Guide to Submit Fire Safety Inspections via the CAFÉ](#)).
3. If an official conducting a fire safety inspection finds a violation of the fire/safety code, the funded organization must also agree to correct these violations within a timeframe they specify as resources permit. These violations and the steps taken to correct them must also be reported to DVP via the CAFÉ.
4. The Funded organization must submit the fire safety inspection, even if there are unresolved violations. Organizations may update the violations as they are resolved and upload a new inspection document as needed.

### DVP Responsibilities

1. Maintain a record for each funded organization with a residential shelter regarding proof of annual fire safety inspection in the CAFÉ.
2. Follow-up with organizations to correct any unresolved violations.
3. Follow the [Compliance Tracking Protocol](#).

## 4.5 Independent Audit / Financial Statement Reviews

### Purpose

Per DVP rule 12.201.4, B, all DVP-funded organizations are required to submit either an independent audit or a financial statement review.

### Funded Organization Requirements

1. An annual audit by a qualified independent Certified Public Accountant is encouraged for all funded organizations and is required for any program receiving \$60,000.00 or more in DVP funds.
2. An annual financial review by a qualified independent Certified Public Accountant is required for any organization receiving less than \$60,000.00 in DVP funds.
3. Funded organizations are encouraged to document the engagement of an auditor with approval from the governing body of the organization for their own records.

# Domestic Violence Program Funding Administration Guide

Funded organizations have one year (365 days) from the end of their budget year to work with an independent auditor, prepare the audit or financial review, and email the board approved document to the DVP Program Assistant ([Melissa.Snider@state.co.us](mailto:Melissa.Snider@state.co.us)). For example, if the budget year is January 1 - December 31, 2016, the funded program's audit or financial review is due no later than December 31, 2017. If available, DVP funded programs may also submit a copy of the auditor's management letter.

## DVP Responsibilities

1. Maintain a record of the most recent audit submitted by each funded organization in the CAFÉ.
2. Ask funded organizations to document how they have addressed any concerns raised by the auditor in the management letter.
3. Follow the [Compliance Tracking Protocol](#).

## 4.6 Water Safety Documentation

### Purpose

Per DVP Rule 12.201.6 F., all DVP-funded organizations must have annual water safety documentation if water at a residential facility is not from a public water source (e.g., well water).

### Funded Organization Requirements

1. The documentation for water safety should be submitted via email to the DVP Program Assistant ([Melissa.Snider@state.co.us](mailto:Melissa.Snider@state.co.us)) annually, only if the water is not from a public water source.
2. If the water safety documentation states that the inspection is good for more than one year, the documentation should be submitted upon the deadline stated in that documentation.

### DVP Responsibilities

1. Maintain a record of the documents submitted by each funded organization in the CAFÉ.
2. Ask funded organizations for additional information as needed.
3. Follow the [Compliance Tracking Protocol](#).

## 4.7 Year-End Narrative

### Purpose

Per FVPSA reporting requirements, all DVP-funded organizations complete a year-end narrative report upon the end of the federal fiscal year. DVP also requires annual reporting on other organizational activities and have added those requirements to the year-end narrative. This includes providing information on organizational policy updates; accessible, culturally responsive, and trauma-informed (ACRTI) practices and training attended; and matching fund documentation.

### Funded Organization Requirements

1. Compile matching fund documentation for the federal fiscal year (see [Section 2.5 Required Match](#))
2. Review all policies in the CAFÉ shared by DVP and check the attestation boxes on each policy indicating that the policy is the most updated version.

# Domestic Violence Program Funding Administration Guide

3. Complete the Year-End Narrative by October 31<sup>st</sup> following the end of the federal fiscal year to include answering all narrative questions, attest that all policies have been reviewed and are up to date, and upload matching fund documentation.

## DVP Responsibilities

1. Maintain a record of the year-end narrative reports submitted by each funded organization.
2. Ask funded organizations for additional information as needed.
3. Follow the [Compliance Tracking Protocol](#).

## 4.8 Four-Year Monitoring Plan

### Purpose

DVP must conduct in-person visits (per FVPSA requirements) and annual monitoring activities (per CDHS Audit Division guidance). The goal of DVP monitoring is to ensure that organizations are adhering to Federal Rules and State Standards, providing quality programming and are engaged in responsible financial management with DVP funds. Based on 2018 survey feedback from funded organizations as well as guidance from the CDHS Audit Division, DVP has modified our approach to monitoring activities to adjust the intervals and intensity of the activities, the methodology, and more.

The new approach will involve creation of four-year individual organization monitoring plans with only one monitoring activity occurring during each fiscal year, for most organizations. The goal of moving to this individual plan with only one monitoring activity occurring during each fiscal year is to reduce the monitoring activity time burden for organizations. Other monitoring activities such as fire safety inspections, insurance requirements, etc. are not included in this monitoring plan.

Please note that all monitoring activities are subject to change as needed based on program performance, risk level, or other factors, identified above. All dates are subject to change based on DVP capacity and ability to meet all funded organization's needs.

### Funded Organization Requirements

1. Respond to the Individual Monitoring Plan sent to your organization with your selection of the preferred months for the monitoring activities to be conducted in (to the best of DVP's abilities) each fiscal year included.
2. Ensure all monitoring requirements are met.

### DVP Responsibilities

1. Create and email individual monitoring plans to each funded organization with a request for input.
2. Maintain a record of the individual monitoring plans submitted by each funded organization.
3. Notify the program of upcoming monitoring activities 4-6 weeks in advance.

# Domestic Violence Program Funding Administration Guide

## 4.9 On-Site Visits

### Purpose

As required by FVPSA, OBM Uniform Guidance, DVP Rule 12.200.5 and CDHS contracting requirements, DVP must conduct monitoring and on-site visits of funded organizations regularly, generally called an On-Site Visit. The purpose of the on-site visit is for DVP Staff to meet with key personnel and in order to jointly verify compliance with the DVP Rules, federal / state funding requirements, and contract compliance.

For low-risk programs, the on-site visit will occur once every four years. These visits will include nonprofit management practices, accessible, culturally responsive, and trauma-informed (ACTRI) practices, data collection practices, innovations, success, challenges, and training and technical assistance needs.

### Funded Organization Requirements & DVP Responsibilities

1. The DVP staff will keep track of the month that each funded organization has indicated on their Individual Monitoring Plan as the preferred month for a DVP Site Visit. Two to three months prior to the organization's preferred month for a DVP Site Visit, DVP staff will begin the scheduling process. Funded organizations may also be selected based on the length of time since the last Site Visit, level of monitoring required based on the information in the Subrecipient Performance Report and Assessment, funded program management transitions, or funded program response to other DVP requirements.
2. Once a funded organization is noted as being on the list for a Site Visit in the next quarter, the DVP Program Assistant will contact the Executive Director and/or Program Director via email to schedule the on-site visit with the employees and board of the organization. Funded organizations are asked to respond to the request for scheduling the visit within seven (7) days.
3. The DVP Liaison to the funded organization will follow-up to confirm the date of the visit along with the agenda for the meeting, which may include, but is not limited to, the following:
  - a. Accessible, Cultural Responsive, and Trauma-Informed (ACRTI) practices and SMART goals
  - b. Successes, innovation, and challenges
  - c. Shelter Safety Checklist (if applicable)
  - d. Non-profit management best practices
  - e. Performance concerns
  - f. Program selected agenda topics
4. After the visit, DVP will draft a report that may include compliance items as well as recommendations.
  - a. **Compliance Items** are based on DVP Rules, federal regulations, and CDHS contract requirements. Funded organizations must provide a response (e.g., updated policies) for each compliance item that will be reviewed by DVP. DVP may request additional information or approve if the documentation meets all standards.
  - b. **Recommendations** are based on analysis of other success nonprofits, domestic violence programming, and best practices. They are included in the report to enhance the funded organization's programming and governance. They may be implemented at the programs discretion or as resources allow. DVP may follow up with these recommendations at later dates but a formal response is not required.
  - c. Funded organizations are required to respond with feedback to the Draft Report within one week to include acceptance of recommendations and/or compliance items, revisions of any errors, and recommendations for a deadline if the deadline set by DVP will not work for the organization (within 30 days of the original deadline).
  - d. Funded organizations are encouraged to schedule a 30-minute call to review the report and compliance items with DVP.

# Domestic Violence Program Funding Administration Guide

5. A final report will be sent out along with encouragement to contact Violence Free Colorado for free training and technical assistance on any of the compliance items or recommendations.
6. Program will be required to email all documentation for compliance items to their DVP Liaison. DVP will review the documentation within 2 weeks of submission and issue either a Progress Report if further documentation is necessary or a Final Report and Date of Full Compliance if documentation for all items is approved by DVP.
7. DVP will provide a survey link to the organization director to request feedback regarding the site visit experience so that this process can be improved. These surveys are anonymous and can only be directly reviewed by the DVP Director.

## 4.10 Financial Desk Reviews

### Purpose

DVP conducts financial desk reviews to ensure consistency in financial reporting and determine areas where targeted technical assistance may be needed. DVP staff will conduct Financial Desk Reviews of 10-15 programs annually per the individual monitoring plans submitted.

### Funded Organization Requirements & DVP Responsibilities

1. Generally, funded organizations are selected for a financial desk review based on the requested months for the desk review on the individual monitoring plan. However, DVP may also select an organization based on inconsistencies in submission of previous requests for reimbursements / invoices, or other factors such as ongoing compliance concerns.
2. Once funded organizations are selected, the DVP Program Assistant will contact them via email to request back-up documentation for expenses documented on previously submitted requests for reimbursement forms/invoices. This documentation must be submitted via the [DVP Financial Desk Review](#) online form. DVP staff will determine the number of months for which back-up documentation will be required. Typically, funded organizations will be asked for 2 months of back-up documentation to ensure that all expenses are allowable and proper back-up documentation is maintained. Organizations may be asked for additional documentation if DVP finds inconsistencies and/or possible errors. Funded organizations will be granted at least two weeks to send the materials to DVP. The following outlines the monthly schedule for most reviews:

Months to be Reviewed	Month that Review Occurs
October, November	January
November, December	February
December, January	March
January, February	April
February, March	May
March, April	June
April, May	July
May, June	August
June, July	September
July, August	October
August, September	November
September, October	December

# Domestic Violence Program Funding Administration Guide

3. Funded organizations will be required to submit all back-up documentation such as timesheets, payroll documents, invoices, receipts, contracts, and other documents to support claimed expenses such as reports from accounting systems. This documentation must be submitted via an online form (see the [Financial Desk Review](#) online form for specific requirements; see [Section 2.7 Back-Up Documentation - Timesheet Requirements](#) and [Section 2.8 Back-Up Documentation - Other Requirements](#) for more information).
4. All backup documentation must comply with OMB, CDHS and DVP requirements, as outlined in the contract for funding, as well as FVSPA funding requirements.
5. DVP Staff will review the materials within two weeks of receipt. DVP Staff will issue a written report to the funded program. The written report will document the results of the review, including a list of missing documents, if any, compliance with requirements as well as any items that may need to be corrected, modified, or explained. If items need to be corrected, modified, or explained funded organizations will be granted 15 days or a deadline set by DVP Staff to respond and comply.
6. DVP Staff will inform the DVP Director if a program does not respond and comply by the deadline and will follow the [Compliance Tracking Protocol](#).

If funded organizations are found to be non-compliant regarding proper back-up documentation or elements of this policy including associated deadlines, DVP reserves the right to withhold future payments, request repayment of funds, terminate the contract or other actions as deemed necessary by DVP and CDHS (see [Compliance Tracking Protocol](#) for more information).

## 4.11 Data Desk Reviews

### Purpose

DVP conducts data desk reviews to ensure consistency in data reporting and determine areas where targeted technical assistance may be needed. DVP staff will conduct Data Desk Reviews of 10-15 organizations annually per the individual monitoring plans.

### Funded Organization Requirements & DVP Responsibilities

1. Generally, funded organizations are selected for a data desk review based on the requested months for the desk review on the individual monitoring plan. Funded organizations may be selected based on inconsistencies in submission of previous data reports or other factors such as ongoing compliance concerns.
2. Once funded organizations are selected, the DVP Program Assistant will contact them via email to request redacted clients files as well as data reports. This documentation must be submitted via the [DVP Data Desk Review](#) online form.
3. DVP staff will determine the number of redacted client files that need to be submitted. Minimally, this will include at least two (2) adult files; one (1) residential (if there are residential services) and one (1) non-residential as well as two (2) child/youth files; one (1) residential (if there are residential services), and one (1) non-residential. These files should contain all required demographic information, services provided, contacts, assessments, etc. from both paper and electronic files. Additional files may be requested based on program performance and risk level.
4. Funded organizations will also need to submit a Client Contact report and a Crisis Call report. These reports are pre-built into the CAFÉ for any organization that is using the CAFÉ for client management. If an organization doesn't use the CAFÉ for client management, they will need to use these spreadsheets (ADD LINK) to provide the required information.



# Domestic Violence Program Funding Administration Guide

5. DVP will review the information provided within two weeks to ensure that all information required by DVP is being collected. The reports will be reviewed to see if the data matches what was previously reported to DVP. Additionally, the information will be reviewed to see if the organization is collecting data per the Domestic Violence Theory of Change and Data Collection Best Practices.
6. DVP Staff will issue a written report to the funded program. The written report will document the results of the review, including a list of missing documents, if any, compliance with requirements as well as any items that may need to be corrected, modified, or explained. If items need to be corrected, modified, or explained funded organizations will be granted 15 days or a deadline set by DVP Staff to respond and comply.
7. DVP Staff will inform the DVP Director if a program does not respond and comply by the deadline and will follow the Compliance Tracking Protocol .

If funded organizations are found to be non-compliant regarding proper back-up documentation or this policy including associated deadlines, DVP reserves the right to withhold future payments, request repayment of funds, terminate the contract or other actions as deemed necessary by DVP and CDHS (see [Compliance Tracking Protocol](#) for more information).

## 4.12 The 1:1 Meetings

### Purpose

DVP is often in various regions of the state for trainings, other on-site visits, and/or conferences. When traveling, it would be an opportune time to meet, informally, with funded organizations to check in to determine contract progress for the year, organizational needs, training and technical assistance requested, etc.

### Funded Organization & DVP Requirements

1. Generally, funded organizations are selected for a quick meeting based on the requested months for the meeting on the individual monitoring plan.
2. Once funded organizations are selected, the DVP Program Assistant will contact them via email to request a time to meet. If an in-person meeting is not feasible, a virtual meeting will be scheduled.
3. The DVP Liaison to the funded organization will follow-up to confirm the date of the visit along with the agenda for the informal meeting, which may include, but is not limited to, the following:
  - a. Accessible, Cultural Responsive, and Trauma-Informed (ACRTI) practices and SMART goals
  - b. Organization Contract Progress
  - c. Program selected agenda topics
4. After the visit, DVP will draft meeting notes regarding the conversation to include any follow-up as needed.

## 4.13 Crisis Line Check Policy & Procedures

### Purpose

According to DVP Rule 12.202.2, DVP-funded organizations must offer free and confidential emergency and crisis response services to victims of domestic violence and their dependents on a continuous basis by employees and volunteers who have been trained in accordance with DVP Rule 12.201.8. From time to time, DVP may confirm that an organization is adhering to this rule by checking their crisis line during non-business hours (5:00 PM to 8:00 AM). Other questions to confirm adherence to Federal Rules and State Standards may be asked during a crisis line check.

# Domestic Violence Program Funding Administration Guide

## Funded Organization Requirements

Funded organizations must offer free and confidential emergency and crisis response services which shall minimally include one or more of the following:

1. Operation of a crisis telephone number accessible to the local community twenty-four (24) hours per day, seven days per week. The crisis line shall be accessible to all callers, including those:
  - a. Using a “blocked line” where their phone number reads on caller ED as “Unavailable”;
  - b. With limited spoken English language proficiency through the provision of interpreters or other communication method; and,
  - c. Who are deaf, hard of hearing, or deaf blind and use a third party telecommunication relay service (such as an IP relay service or a video relay service, teletypewriter (TTY) device) per the requirements of the Americans with Disabilities Act (ADA).
2. Availability of employees or volunteers trained in accordance with Section 12.201.2 who are able to respond to emergency crisis situations twenty-four (24) hours per day, seven days per week; or,
3. Coordination through a formal memorandum of understanding with a DVP-funded program in good standing serving the same region that operates its own crisis response services as outlined in 1 and 2, above.

## DVP Responsibilities

1. Crisis Line checks will be completed prior to the 1:1 Meetings conducted once every four years. These checks may include the following:
  - a. Placing a call to the organization after business hours to check that the crisis line is available to blocked callers and is being answered per their own protocol (e.g., via an answer service or live).
  - b. For organizations without a 24-hour crisis line, DVP will:
    - i. Call the main business line of the program to check a 24-hour crisis line number was provided in the after-hours voicemail message and record which program is providing the service.
  - c. For live crisis lines, DVP will:
    - i. Call the crisis line of the program after business hours.
    - ii. Confirm crisis line number with advocate that answers the crisis line.
  - d. For other crisis lines, DVP will:
    - i. Call the crisis line of the program after business hours.
    - ii. Provide answering service or dispatch with name and call back number (or input number into pager).
    - iii. Record the response time.
    - iv. Confirm crisis line number with advocate that responds back.
2. DVP will discuss this check with the organization during the 1:1 Meeting and provide any feedback or action steps to comply with requirements.

## 4.14 Compliance Tracking Protocol

### General Compliance Protocol Steps / Definitions

#### *Courtesy Email*

DVP staff will send a Courtesy Email to the funded organization if DVP has identified unaddressed compliance issues, i.e., if their insurance documentation is more than five (5) days late. The email will include activities and deadlines for the funded organization to reach compliance with the identified issue.

# Domestic Violence Program Funding Administration Guide

## ***Warning Notice Letter***

If the activities identified in the Courtesy Email are not completed by the identified deadlines, DVP staff will send a Warning Notice letter to the governing body of the funded organization to warn them of further action to be taken if compliance is not obtained, i.e., a Warning Notice will be sent if the insurance documentation is more than 30 days late. Upon receipt at the funded organization, the Warning Notice must be signed by the chair of the governing body and returned to DVP within five (5) business days.

## ***Notice of Payment Hold***

If the activities identified in the Warning Notice are not completed by the identified deadlines, DVP staff will send an email informing them of noncompliant status. This Notice of Payment Hold is outlined by the following:

1. The contract is suspended until full compliance is obtained.
2. Contractual expenses will not be reimbursed until full compliance is obtained. For example, if a funded organization submitted a request for reimbursement of December expenses and was found noncompliant in January, December expenses would not be paid until full compliance is obtained.
3. If full compliance is not obtained within 30 days, DVP will send the funded organization a Notice of Contract Breach, per contractual requirements.
4. Funded organizations may appeal a Notice of Payment Hold per DVP rule 12.200.5 G. This appeal must be done in writing and submitted to the DVP Director within 30 business days of receipt of the Notice. The Advisory Committee will review the appeal and provide DVP with a recommended course of action. DVP will issue a written decision to the appeal within 60 business days of the receipt of the appeal. The written decision shall be the final agency decision.

## ***Notice of Contract Breach***

If the organization fails to obtain full compliance within the timeframes outlined in the Notice of Nonpayment, DVP will issue a Notice of Contract Breach per contract provision §13.

1. Payment will continue to be withheld until full compliance is obtained.
2. The organization will have 30 days to show full compliance with the DVP contract (cure period).
3. Failure to obtain full compliance will result in contract remedies up to and including termination per contract provision §14.A.

All DVP-funded organizations must maintain full compliance with DVP standards, rules, and contractual obligations/terms. Funded organizations may request an extension for any deadline which may be granted on a case-by-case basis.

## 5. Other Requirements

### 5.1 Formal Complaints

#### Purpose

Per DVP Rule 12.200.6, concerned citizens, victims or survivors of domestic violence, clients of funded organizations, employees or volunteers of funded organizations, or other concerned parties may file a formal complaint regarding services provided or denied at funded organizations, potential violations of DVP rules, or other matters pertaining to the operation of a funded organization.

#### Funded Organization Requirements

Funded organizations must have a written grievance policy that is provided to all clients that includes:

1. An escalating process for the individual to complete regarding any grievance with the funded program (i.e., talk with program supervisor, then executive director, then board of directors).
2. Contact information for DVP to file a formal complaint. DVP can be contacted by anyone if they are unable to resolve the issue by following the funded program's grievance process. DVP contact information should include the DVP website, phone number and address.

#### DVP Responsibilities

Upon receiving a complaint against a funded program, DVP will:

1. Review the complaint within 45 business days;
2. Inform the funded organization that a complaint has been filed against them with a summary of the complaint and request a response to the complaint within 30 business days, if necessary; and,
3. If the complaint includes violations of DVP Rule, DVP shall bring the complaint to the Advisory Committee to review the complaint and program response in an executive session of the committee regular meeting. A reply on any decisions made by the committee to the individual that filed the complaint and the funded program will be provided within 60 business days.

### 5.2 Critical Incident Reporting

Per DVP Rule 12.200.7, funded organizations shall inform DVP of critical incidents impacting their ability to meet contractual obligations, comply with DVP rules, provide safe services for clients, maintain safe operations of the program, or sustain prudent financial stewardship of resources. One example of a critical incident that should be reported to DVP is a fire that damages or destroys property and impacts the daily service provision to clients and/or recordkeeping for the DVP contract.

#### Funded Organization Requirements

Funded organizations must inform DVP of any circumstances that may be considered a critical incident ([Critical Incident Form](#)) within five (5) days of the incident. Be sure to include any assistance needed by DVP in the report.

#### DVP Responsibilities

DVP will review any submitted Critical Incidents, request additional information if necessary and will provide assistance as needed.