



# TN Coalition 2016

OCJP Monitoring Process & Common Findings

# OCJP Monitoring Process Has Changed

- What is different?
  - Increase focus on Project Implementation
  - Increase focus on Project Performance

*“Did you do what you said you were going to do to the extent you said you were going to do it?”*

# New Monitoring Process 2016

- Monitoring is conducted by the OCJP Program Manager and the Fiscal Monitor.
- Program and Fiscal reviews will in most cases be separate.
- Agencies are notified at the beginning of the year they will be monitored (or when added during the year).
- Agencies are given a copy of the monitoring review guide.
- The Program Manager sends a list of documents needed prior to the review which includes a Personnel Certification & Civil Rights Attestation.

# New Monitoring Process cont'd

- The Program & Fiscal Reports will be sent separately.
- Agencies should submit separate Corrective Action Plans (CAPs) for the Program and Fiscal reports.
- OCJP will send separate responses for the Program & Fiscal CAPs.

# OCJP Administrative Manual

New Look:

<http://tn.gov/lawsandpolicies/section/office-of-criminal-justice-programs-grants-manual>

# Moving Forward:

- The common findings identified in 2014 have decreased.
- Changes this year (FY 2016) are an effort to assist agencies in compliance and performance.
- The Administrative Manual has been made more accessible and searchable.
- Compliance in all areas (and not just those monitored) is expected.
- Findings and observations are opportunities for improvement in operations and service delivery.

# Common Findings 2015

- Personnel Files do not contain required documents
- No or inadequate background checks
- Staff/volunteers did not receive CIC training
- Not maintaining confidentiality of records
- Non-compliant Release of Information form
- Not able to produce required documents
- Expenses charged prior to start of contract
- Policy 03 report not submitted or late
- Client files not complete
- No data collection procedures or inadequate methods

# Personnel Files

## VI. Personnel Policies and Procedures

- D. PERSONNEL FILE REQUIREMENTS:** Agencies are required to maintain personnel files for all staff employed by grant monies or volunteers providing direct services to clients. These records should minimally contain the following information:
1. Documentation of verified character/employment references
  2. An agency application or resume'
  3. A signed release of information granting the organization permission to obtain a background check and to conduct reference checks
  4. Job description
  5. Documentation of training/certification received such as the topic, presenter, length of training, dates.
  6. Documentation of minimum qualifications
  7. Documentation of background checks according to agency policy.

See more at: <https://tn.gov/lawsandpolicies/topic/ocjp-chapter-vi-personnel-policies-and-procedures#sthash.4YpJPwkm.dpuf>

# Background Checks

## VI. Personnel Policies and Procedures

9. BACKGROUND CHECKS - Agency must have a policy for background checks and adhere to the policy. At a minimum, this policy must include which agency positions require a background check and the type of check performed. Additional requirements for background check are outlined below: Screening of staff and volunteers to ensure that children and vulnerable adults are protected. Individuals in contact with children and vulnerable adults must have background check/screening information collected from the following:
- TBI Fingerprint Background Check or a private National Criminal History Check/Screening provider, and
  - Sex Offender Registry (TBI Website) search.

See more at: <https://tn.gov/lawsandpolicies/topic/ocjp-chapter-vi-personnel-policies-and-procedures#sthash.T1XzFs0t.dpuf>

# Criminal Injury Compensation Training

## VOCA , II. ELIGIBILITY REQUIRMENTS

All VOCA staff and volunteers providing direct services to victims must receive training on Criminal Injury Compensation once during each fiscal year. Training related to Criminal Injury Compensation must be documented in the grant file.

See more at: <https://tn.gov/lawsandpolicies/article/ocjp-victims-of-crime-act-voca#sthash.MtT4QJXA.dpuf>

# Client Files

## II. Achievement of Operational Status

- C. PROJECT DIRECTOR: The Project Director is responsible for ensuring that client files are maintained on each individual receiving direct or subcontracted services under this grant. If multiple funding sources support a single function (i.e. shelter), the Project Director must be able to delineate which funding source(s) support which service(s) the individual received. The file on each individual should minimally include identifying information about the individual served, services provided and dates of service(s).

See more at: <https://tn.gov/lawsandpolicies/topic/ocjp-chapter-ii.-achievement-of-operational-status#sthash.tCF9lyCx.dpuf>

# Confidentiality

## Chapter XX. Retention of and Access to Records

### **D. CONFIDENTIALITY POLICY**

Each agency that receives a grant from the Office of Criminal Justice Programs (OCJP) to provide direct services to victims of crime should have a confidentiality policy in place to protect confidential personally identifying information. Furthermore, confidentiality statements should be signed by all staff, volunteers, interns, board members, etc. and should state, at a minimum, that s/he will protect the personally identifying information of all persons contacting the agency for service, regardless of whether these persons actually receive services from the agency.

See more at: <https://tn.gov/lawsandpolicies/topic/ocjp-chapter-xx.-retention-of-and-access-to-records#sthash.QISu21X7.dpuf>

# Release of Information

## XX. Retention of and Access to Records

### D. Confidentiality Policy

#### 2. Nondisclosure:

...subrecipients shall not-

- b. disclose, reveal, or release individual client information without the **informed, written, reasonably time-limited consent** of the person (or in the case of an unemancipated minor, the minor and the parent or guardian or in the case of legal incapacity, a court-appointed guardian)

Sample Release of Information Form

Release of Information Best Practices

See more at: <https://tn.gov/lawsandpolicies/topic/ocjp-chapter-xx.-retention-of-and-access-to-records#sthash.YZAeN1X3.dpuf>

# Monitoring

## XIX. Subrecipient Monitoring

### **2. Subrecipient Agency Preparation for a Monitoring Visit:**

It is OCJP's expectation that all agencies scheduled for a monitoring visit will be prepared and have available all the information requested when the visit is arranged. Additional documentation may be requested at the time of the review. Failure to cooperate fully with the monitoring process will result in written documentation of the agency's lack of compliance.

See more at: <https://tn.gov/lawsandpolicies/article/ocjp-xix.-c.-OCJP-monitoring#sthash.FH73VSQ0.dpuf>

# Data Collection

## Fund Source Chapters, Reporting Requirements

**NOTE:** The subrecipient is required to gather and maintain statistical data relating to grant project activities as required by the Office of Criminal Justice Programs. The data collected should support the information submitted on the annual reports. OCJP may periodically request to see the back-up data that supports the information submitted on your output and outcome reports.

See more at: <https://tn.gov/lawsandpolicies/article/ocjp-family-violence-prevention-services-act-program-fvpsa#sthash.jkSBPOEw.dpuf>

# Invoicing for Expenses

## III. Financial Requirements

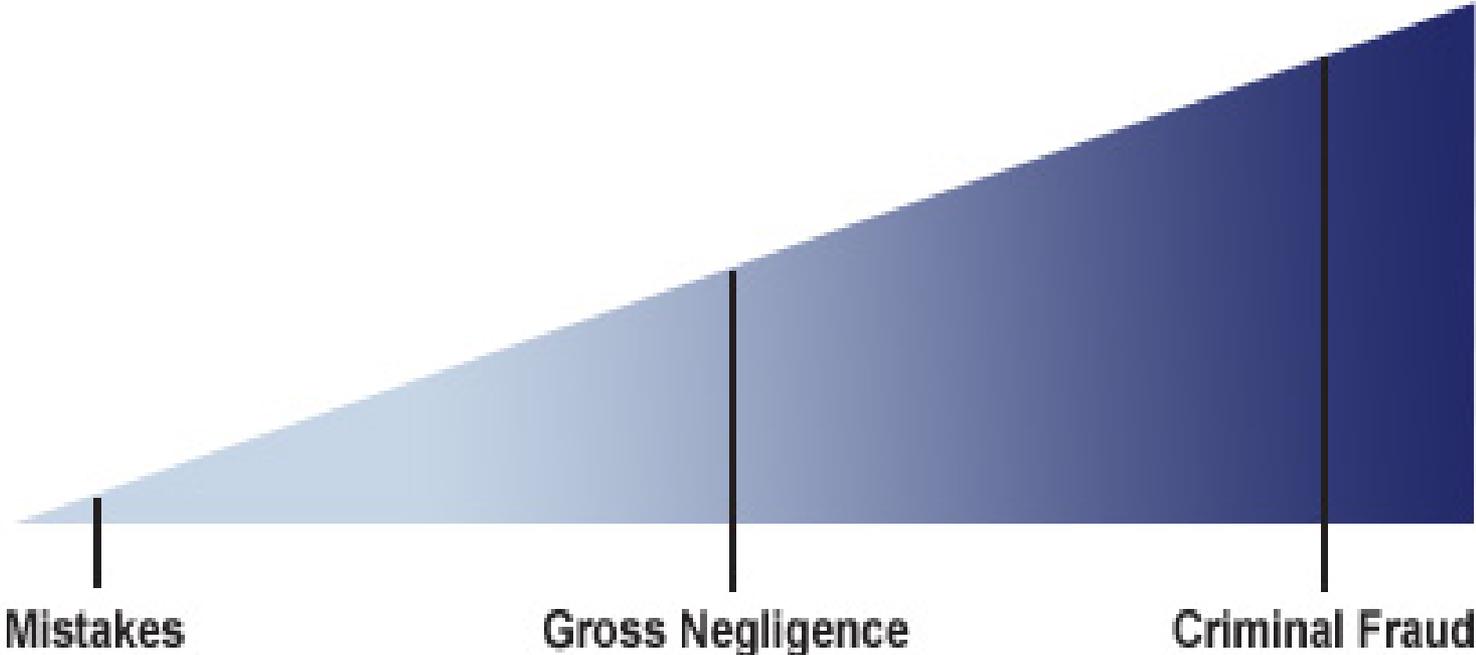
### 2. Accounting Systems Criteria:

Each year of a continuation grant is regarded as coming from a separate fund source and should be accounted for as such.

And

Section C.3. of the Grant Contract states, "The Grantee shall be compensated for actual, reasonable, and necessary costs based upon the Grant Budget...."

# The Slippery Slope



# Questions?



# How to contact OCJP

- OCJP Program Manager
  - More accessible
  - More knowledgeable about your specific program
- Jennifer Brinkman- [Jennifer.Brinkman@tn.gov](mailto:Jennifer.Brinkman@tn.gov)
- Daina Moran- [Daina.Moran@tn.gov](mailto:Daina.Moran@tn.gov)