

**IOWA DEPARTMENT OF JUSTICE**

**ATTORNEY GENERAL  
BRENN A BIRD**



## Chapter 5 Policies and Procedures

Subrecipients of Crime Victim Assistance Division (CVAD) funds are required to have certain policies and procedures in place to adhere to state and federal statute and rule, as well as to ensure best practices for grant management and victim services delivery.

# Personnel Policies and Procedures

Agency records and accounting systems must include the following components for personnel approved in the project's budget.

[Personnel Policies and Procedures](#)

[Personnel Costs](#)

[Personnel Qualifications](#)

[Personnel File Requirements](#)

[Personnel Paid 100% from a single federal award](#)

[Personnel Change Notification](#)

[Staff Vacancies](#)

[Subcontracted Staff](#)

## Personnel Policies and Procedures

The subrecipient must have written personnel policies and procedures that address:

1. Work hours
2. Holidays, vacations, sick leave, and other leave time – policy should include payout directives in the event a staff member quits, is laid off, or is terminated.
3. Overtime pay and compensatory time - Overtime pay must be authorized in the approved budget, or prior written approval must be obtained from CVAD before any overtime is worked.
4. Hazard pay, if applicable
5. Remote work
6. Administrative leave
7. Termination
8. Qualifications
9. Written job descriptions
10. Training received
11. Supervision of staff
12. Time and activity tracking of staff
13. Duplication of pay – Agency must have a policy ensuring employees working on the grant-funded project are not receiving duplicate compensation (i.e. being paid with grant funds while receiving a salary for the same period from another source)
14. 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.
15. Seat belt usage in accordance with Iowa law

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:

- National Background Check or a private National Criminal History Check/Screening provider, and
- [Sex Offender Registry](#) search.
- All background checks otherwise required by state or federal law, or required for the programs/services provided by the sub-recipient (including fingerprint background checks through the IA Department of Public Safety, if required—see below).

Individuals transporting clients must have the following information reviewed:

- Driving Record Check
- Proof of Liability Insurance

[back to top](#)

## Personnel Costs

Time and Attendance Records – Accurate time and attendance records are required to be maintained for all personnel whose salary is charged to the project. These records should minimally contain the following information:

- Date (day, month and year)
- Employee's name
- Position title
- Total daily hours charged to the project
- Activities related to the project
- Employee's signature
- Project director or supervisor's signature
- Funding source (Federal grant # when applicable)

The subrecipient may use any form that provides the above information.

\*One-time salary supplements or bonuses, including severance provisions, may not be paid with federal and/or state funds. Personnel working for more than one project must have sufficient records to show an accurate accounting of each project which have hours recorded to them. This can usually be accomplished by having personnel keep a detailed log of their activities for each project as noted above.

[back to top](#)

## Personnel Qualifications

Agencies must employ qualified individuals for the positions in which they are employed. At a minimum, agencies should obtain verification of education, training and/or any certifications prior to employment. Additionally, agencies should review prior work experience and contact references. It is an expectation that any employee being hired into a specialty position (i.e. an attorney, or a forensic nurse examiner), has the appropriate certification(s), or education to ensure competency.

[back to top](#)

## Personnel File Requirements

Agencies are required to maintain personnel files for all staff funded with CVAD grant funds, as well as all volunteers providing direct victim services to clients. These files should minimally contain the following information:

- Documentation of verified character/employment references
- An agency application or resume'
- A signed release of information granting the organization permission to obtain a background check and to conduct reference checks
- Job description
- Documentation of training/certification received such as the topic, presenter, length of training, dates.
- Documentation of minimum job qualifications if not evident from application or resume
- Documentation of background checks according to agency policy.

[back to top](#)

## Personnel Paid 100% from a single federal award

In order to comply with federal regulations, grant funded employees (and those used for match) are required to track and allocate time worked on grant activities. Subrecipients with employees who are paid 100% from a single federal grant source, for at least six months, are exempt from tracking their time and activities if those employees' personnel files include their job description and the signed certification form. All activities performed by these employees must be allowable under the funding source from which they are paid.

[back to top](#)

## Personnel Change Notification

Subrecipients must update their organizational PROFILE in Iowa GVS immediately when any of the following occur. Subrecipients must also email their grant coordinator to advise of the changes.

### 1. Contact information changes

- Any change of address for authorized official, project director, or financial director for the grant-funded project
- Change in e-mail address of project director, financial director, authorized official or any personnel funded by this grant.

### 2. Personnel Changes

- a. Any cessation or interruption of implementation of project activities arising from litigation, loss of staff, or programmatic restructuring
- b. Change in or temporary absence of the Project Director or Financial Director
- c. Change in Authorized Official
- d. Change in grant funded personnel positions
- e. Temporary staff changes should also be reported
- f. Any position paid 100% by a single federal source (notify every 6 months)

[back to top](#)

## Staff Vacancies

Vacancies in all grant funded positions MUST be reported in writing (e- mail, fax, or mail) to CVAD within 30 days of the vacancy. All grant funded vacant positions MUST be filled within 45 days of the vacancy. Failure to abide by this requirement may result in the agency losing the vacant position(s). If the position(s) is/are not filled within 45 days, the subrecipient must notify CVAD, provide a reason for the delay and explain how the program is providing services while the position is vacant. Once the vacant position(s) is filled the subrecipient MUST update the budget details form by submitting a name change via an amendment/revision in Iowa GVS by following [these instructions](#).

[back to top](#)

## Subcontracted Staff

For policies concerning Subcontracted Staff see [Chapter 15 Procurement of Professional Services](#).

For specific volunteer requirements related to match see [Chapter 3 Financial Requirements, A. Grant Requirements, c. Match, 3 Volunteer](#).

# Agency Policies and Procedures

The subrecipient must have written policies and procedures that address:

## 1. **Guidelines for service delivery:**

Policy must include policies and procedures to guide the administration of services to victims (counseling, legal services, shelter, therapy, etc.)

~Policy must describe the standard and components/activities in each of the services

~For more information on service standards, see [CVAD Grant Manual, chapter 8.](#)

## 2. **Client confidentiality & security of confidential information:**

This requirement applies to victim services organizations, including VOCA Projects

Policy must include:

~How the organization will protect clients' confidentiality and the responsibility of staff, volunteers, and board members to protect client confidentiality;

~How the organization secures victim records and who has access to the client records;

~The requirement that confidentiality statements must be signed by all staff, volunteers, interns, board members;

~For more information on confidentiality, see [CVAD Grant Manual, chapter 7.](#)

## 3. **Informed consent & release of client information:**

This requirement applies to victim services organizations, including VOCA Projects

Policy must include:

~The use of a release of information form for the organization to obtain consent from victims to release their information.

For more information on releases, see [CVAD Grant Manual, chapter 7.](#)

## 4. **Breach of personally identifying information:**

~Requirement to report an actual or imminent breach of personally identifiable information (PII) to CVAD or to an OJP program manager **no later than 24 hours** after an occurrence of an actual breach, or the detection of an imminent breach. [This is a requirement of certified assurances.](#)

~For more information on breaching PII, see [CVAD Grant Manual, chapter 7.](#)

## 5. **Volunteer policies/manual & volunteer tracking form:**

All recipients of **VOCA funds** are required to have at least 1 **direct service** volunteer for 1 hour for each grant cycle. Please contact your grant manager if you need assistance volunteer use or if a waiver is needed

Policies and procedures must include:

~How your organization recruits, selects, screens, trains and supervises volunteers

~How volunteer hours are documented; your **volunteer tracking form** should include: volunteer name and signature, date and number of hours volunteered, and a brief description of the volunteer work. Optional items on the checklist are check box for direct or services and a total line to tabulate hours.

~How **volunteer files** are maintained to include: job description, application or resume, reference checks, signed confidentiality form, background check showing child abuse and criminal background checks for volunteers providing direct services, training (if applicable), volunteer evaluations (if applicable), signed sexual harassment policy, driving record check and proof of liability insurance if transporting clients

For more information on volunteer requirements, see CVAD Grants Manual, chapter 5, or use the search function

## 6. **Grievance policy and procedures (including alleged civil rights violations):**

Policy and procedures must include:

~How **victims, employees, and volunteers** file grievances or complaints regarding potential violations of a victim service program's service standards, contractual stipulations and /or certified assurances.

~The stipulation that if someone is filing a complaint about a CVAD funded activity, they use the online complaint form found in the [CVAD Grant Manual, chapter 24.](#)

~Complainants must also be informed they may file complaints directly with the Office of Civil Right or the [Iowa Civil Rights Commission](#):

**U.S. Department of Justice**,

Office of Justice Programs  
Office for Civil Rights (OCR)  
810 7th Street NW  
Washington, DC 20531

~The procedures for filing discrimination complaints are to include the following: (1) a process for accepting and investigating complaints within the organization (2) process for referring the complaint to an appropriate investigating entity (the referral organization should be identified in the policy and/or procedure) in the event that the grantee does not have the capacity to investigate discrimination complaints; (3) Notice to employees that they may also refer program participants to the OCR, CVAD or Iowa Civil Rights Commission (ICRC) in the event that the program participant does not want to file directly with the organization/grantee and (4) Contact information for the aforementioned agencies (OCR, CVAD or ICRC) should be included in procedure/policy.  
For more information on policies see [chapter 2](#) of the CVAD grant manual

**7. Nondiscrimination policy:**

Policy and procedures must include:

~Notification to employees, and victims that the organization does not discriminate on the basis of race, color, national origin, religion, sex disability, or age; that it does not retaliate against a person who files a discrimination complaint or lawsuit, who complains about discrimination; or who participates in a discrimination proceeding, such as being a witness in a complaint investigation or lawsuit.

~Written policies and procedures advising how to file complaints or allegations of discrimination must be given to employees and clients.

~Grievance procedures that incorporate due process standards and provide for the prompt and equitable resolution of complaints alleging a violation of the DOJ regulations implementing Section 504 of the Rehabilitation Act of 1973, found at [28 C.F.R. Part 42 G](#), which prohibits discrimination on the basis of disability in employment practices and the delivery of services.

~*Designation of responsible employee.* A recipient employing fifty or more persons and receiving Federal financial assistance from the Department of \$25,000 or more shall designate at least one person to coordinate compliance with this subpart.

~All clients, customers, program participants, employees, job applicants, or consumers of CVAD, or of CVAD's subrecipients have the right to participate in programs and activities operated by CVAD or its subrecipients regardless of race, color, religion, national origin, sex, age, disability. In addition, subrecipients of Violence Against Women Act (VAWA) grants are prohibited from discriminating on the basis of sexual orientation or gender identity or expression.

~Adverse findings of a civil rights complaint must be sent to CVAD.

~Notification services must be provided regardless of religious beliefs.

~If an **organization conducts explicitly religious activities**, that organization must have a mechanism in place to notify program participants that it does not: (1) discriminate on the basis of religion in the delivery of services. This can be part of the intake packet, on a brochure, on the subrecipient's website, etc.; (2) will make reasonable efforts to refer clients who object to the religious character of an organization to another agency for similar services and keep a record of the requests for an alternate provider; and (3) If the organization has hiring practices favoring co-religionists, they should have sent a Certificate of Exemption to CVAD.

**8. Drug-free workplace:**

All grantees must have a drug-free workplace policy and procedures which include:

~Publishing a statement that notifies employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the workplace and those actions will be taken against employees for violation of the prohibition

~Discourages alcohol and drug abuse and encourages treatment

~Acknowledges that drug and alcohol dependencies are health problems and encourages those with alcohol and drug abuse issues to seek treatment

~A drug-free awareness program



~Requires employees to notify the organization in writing of a criminal drug statute conviction occurring in the workplace no later than five calendar days after conviction **and** requires the organization to inform CVAD within 10 calendar days after the conviction of an employee of the organization, of such conviction

~Specify actions the organization can take with an employee who has received a criminal drug statute conviction

For more information on the federal requirements of a drug free workplace, click [here](#).

**9. Non-Violence in the workplace:**

All grantees must have a non-violence in the workplace policy and procedures which includes:

~A statement proclaiming the organization will maintain a workplace environment free from threats and acts of violence

~A lists of prohibited behaviors, such as: causing physical injury to another person; acting in an aggressive or hostile manner that creates fear of injury to someone; intentionally damaging property of the organization or of another employee; possessing a weapon during grant-related activities (not applicable to law enforcement).

~How someone reports workplace violence, and if the report can be made anonymously

~What steps are taken to address reports of workplace violence

**10. Policy banning employees, contractors/subcontractors and volunteers from texting while driving:**

All grantees must have an on-the-job policy banning employees, contractors/subcontractors and volunteers from texting while driving an organization-owned, rented or personally owned vehicle. The policy should also include workplace safety information and other awareness activities to decrease crashes caused by distracted driving.

**11. Policy requiring employees, contractors/subcontractors and volunteers requiring the use of seatbelts:**

All grantees must have an on-the-job seatbelt policy which requires employees, volunteers and contractors to use their seatbelts when driving or riding in an organization-owned, rented or personally owned vehicles.

**12. Records retention:**

All grantees must have a record retention policy to include:

~How long all closed and inactive client files shall be retained

~How closed and inactive files are destroyed

~How long financial and program records and supporting documents concerning CVAD funded projects shall be retained

~Who has access to grant-related books, documents, papers or other records associated with CVAD funding

For retention requirements, see [CVAD Grant Manual on record retention](#).

**13. Nepotism:**

All grantees must have a policy addressing hiring relatives of an employee or board member.

**14. Conflict of Interest:**

All grantees must have a conflict of interest policy which includes:

~An explanation, or definition of what qualifies as a conflict of interest such as “a transaction or arrangement that could benefit an officer, director, or employee?”

~Prohibition of actions that might result in, or create the appearance of conflict of interest, such as: using an official position for private gain or giving preferential treatment to any person

~ The requirement board members and staff are to be excused from voting or participating in workplace decisions when a conflict or an appearance of a conflict exists

For information on conflict of interest see [CVAD Grant Manual, chapter 1](#).

**15. Lobbying activities (restriction of):**

All grantees must have a policy on lobbying. Lobbying is prohibited with federal funds.

Lobbying requirements and restrictions are detailed in [CVAD Grant Manual, chapter 17](#).

- 16. Tracking, retention and depreciation of inventory, equipment and property:**  
All grantees must have a policy on tracking equipment and property. For CVAD grants, equipment purchased prior to the 2022 grant year must be recorded on the [inventory reporting form](#) and emailed to your grant manager. Equipment purchased during the 2022 grant year and after will be recorded during the claim process via Iowa Grants for Victim Services. Organizations should have a policy and procedures to track and record all equipment regardless of the funding source. See [CVAD Grant Manual, chapter 12](#) for more information.
- 17. Accounting policies:**  
All grantees must have accounting policies regarding the receipt and disbursement of funds, purchasing and payment of expenditures and the requirement of appropriate segregation of duties. Additionally, the policies should include how the organization separates and accounts for each funding source (no co-mingling of funds); the role of a payroll service if appropriate, use of an auditor, requirement the audit be forwarded to CVAD. See [CVAD Grant Manual, chapter 3](#) for more accounting requirements.
- 18. Purchasing:**  
All grantees must have policies and procedures on purchasing. See [CVAD Grant Manual, chapter 10](#) on purchasing.
- 19. Travel**  
All grantees must have policies addressing travel for staff and volunteers when providing services and when traveling to trainings, conferences or meetings; in and out of state. [CVAD Grant Manual, chapter 11](#) provides CVAD and the State of Iowa travel rules.
- 20. Client Assistance:**  
Grantees who provide client assistance must have a policy describing in detail how client assistance is distributed.
- 21. Gift Card:**  
Grantees who use gift cards must have a policy describing who is authorized to purchase gift cards, how gift cards are logged (with or without a client number), stored and inventorized, who has access to them, and the process for distributing them.
- 22. Language access plan:**  
Grantees must have written procedures that outline the organization's policies and procedures for ensuring victims have access to necessary forms of communication, both written and verbal.
- 23. Determination of suitability to interact with participating minors:**  
The recipient, and any subrecipient at any tier, must **make determinations of suitability before certain individuals may interact with participating minors**. This requirement applies regardless of an individual's employment status. One of the special conditions included in all certified assurances is the determination of suitability to interact with participating minors. In summary, your agency must determine if covered individuals are suitable to interact with participating minors. [OVW award condition document](#). This [document](#) provides the definition of this award condition, clarification from CVAD, resources and additional information regarding working with minors.
- 24. Employment eligibility verification for hiring under the award:**  
Your policies must ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the subrecipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1). For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify ([www.e-verify.gov](http://www.e-verify.gov)), provided an appropriate person authorized to act on behalf of the subrecipient uses E-Verify (and follows the proper E-Verify procedures, including in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.
- 25. Sexual harassment and the response to workplace-related incidents of sexual misconduct:**



A sexual harassment policy is required for all grantees to include sexual harassment can include:

- ~Offensive remarks about a person's sex, gender, gender presentation, or sexual orientation
- ~Ongoing comments or teasing of a sexual nature that make someone uncomfortable
- ~Unwelcome sexual advances
- ~Making sexual favors a condition of employment, promotion, or work assignment ("quid pro quo" harassment)
- ~Touching another person in a sexual way
- ~Exposing someone to sexually explicit materials without their consent

The policy also needs to include:

- ~The process for filing a grievance of sexual harassment by an employee, client, victim, volunteer or board member
- ~What the process for filing a grievance looks like when the alleged perpetrator is a supervisor, administrator or director
- ~The requirement for current and new staff and volunteers to sign an acknowledgement form that they have reviewed and understand the sexual harassment policy

**OVW funded grantees (STOP VAWA and SASP)** must adhere to the [policy for response to workplace-related incidents of sexual misconduct](#), domestic violence, and dating violence - See also [CVAD certified assurances](#). For OVW grant funded activities, this policy must address the following:

1) allegations of workplace-related incidents of sexual misconduct, domestic violence, and dating violence by an employee, volunteer, consultant, or contractor;

2) workplace supports for employees, volunteers, consultants, or contractors who are victims of sexual misconduct, domestic violence, or dating violence; and

3) adjudications that will result in an employee, volunteer, contractor, or consultant being prohibited from occupying positions that could undermine the ability of the recipient or subrecipient to carry out the grant funded project, such as positions working with victims and other vulnerable populations. A policy may provide that certain adjudications do not prohibit an individual from occupying such a position but must include standards for granting such an exemption for an individual.

