



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.

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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

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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.

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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 position requiring a specialty position (i.e. an attorney, or a forensic nurse examiner), have the appropriate certification(s), or education to ensure competency.

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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.

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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.

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Personnel Change Notification

Subrecipients must provide written notification to CVAD within thirty (30) days from the date of occurrence of the following:

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)

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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 position(s) in question. If the position(s) is/are not filled within 45 days, the subrecipient must notify the primary VSS staff member by submitting the completed [Staff Update form](#) via email or through a message in IowaGrants.gov. This message should include a justification for the delay in filling the position and must explain how the program is providing services while the position is vacant. After 45 days CVAD must receive a monthly report of this information until the position is filled. Once the vacant position(s) is filled the subrecipient MUST notify CVAD in writing within 30 days of the following information as it pertains to the new employee(s):

- Position Title
- Name of Employee
- Date Hired
- Salary
- Percent of time allotted to the grant funded project
- Job Description

Subrecipients are required to provide CVAD with updates within 30 days of staff turnover for positions funded with CVAD funds or positions used as match.

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Subcontracted Staff

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

For specific volunteer requirements related to match see [Chapter III. 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
2. Client confidentiality & security of confidential information
3. Informed consent & release of client information
4. Breach of personally identifying information
5. Volunteer policies/manual & volunteer tracking form
6. Grievance policy and procedure (including alleged civil rights violations)
7. Nondiscrimination policy
8. Drug-free workplace
9. Non-Violence in the workplace
10. Policy banning employees, contractors/subcontractors and volunteers from texting while driving
11. Records retention
12. Nepotism
13. Conflict of Interest
14. Lobbying activities (restriction of)
15. Tracking, retention and depreciation of inventory, equipment and property
16. Accounting policies (including those for the receipt and disbursement of funds, purchasing and payment of expenditures) that require appropriate segregation of duties
17. Purchasing
18. Travel (by staff and volunteers to provide client services and/or to attend trainings, conferences or meetings; in and out of state)
19. Client Assistance
20. Gift Card
21. Language access plan
22. Sexual harassment

