Grantee Checklist

CVAD Policies, Procedures & Other Information

Below are a list of required policies, procedures, and other information for grantees to have as part of their organization or project. The focus of this checklist is to provide guidance to grantees in understanding what needs to be included in the policies/procedures required by CVAD. There may be additional items required as this is a working/changing document as we receive more direction or information from federal and state agencies on requirements. These policies/procedures are required in order to receive CVAD grant funds.

Information regarding policies and procedures is in the [CVAD Grant Manual,](https://www.iowaattorneygeneral.gov/manual/chapter-21-subrecipient-monitoring/on-site-monitoring) chapters 2 and 5.

**Determination of suitability to interact with 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.](https://www.justice.gov/ovw/page/file/1202141/download)This [document](https://www.iowaattorneygeneral.gov/media/cms/Determination_of_suitability_to_int_481120B961F36.docx)provides the definition of this award condition, clarification from CVAD, resources and additional information regarding working with minors.

**Employment Eligibility Confirmation**

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), 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.

**OVW funded sexual harassment misconduct 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.](https://www.iowaattorneygeneral.gov/manual/chapter-1/certified-assurances/#Policy) 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.

**Federal Civil Rights Requirements Section – Applies to All Grantees**

# Equal Employment Opportunity Plans (EEOP)

Please refer to website at [Civil Rights | Equal Employment Opportunity Plans | Office of Justice Programs (ojp.gov)](https://www.ojp.gov/program/civil-rights/equal-employment-opportunity-plans). This website provides you with frequently asked questions as well as an EEO Tool that will walk you through the steps of what you need to complete for the organization. Please be sure to document when and who completed the tool and printing out any screen shots of completion or forms completed form this tool. This link: [cert.pdf (ojp.gov)](https://www.ojp.gov/sites/g/files/xyckuh241/files/media/document/cert.pdf) is to the EEOP short form.

Does your organization have documentation that they submitted and EEO plan (or any other required document – like the short form, etc.) to Office of Civil Rights (OCR) and then to CVAD (if applicable after utilizing the EEO Tool outlined at website above)?

**Notice of Non-Discrimination**

Does the procedures notify and inform employees how to file complaints alleging discrimination?

Does it include contact information for the external agencies (Office of Civil Rights, CVAD, or Iowa Civil Rights Commission)?

**Notice to Employees/Potential Employees “How” to File a Complaint**

Does the procedures notify and inform employees, clients/program participants and volunteers on how to file a complaint alleging discrimination?

Does the procedures notify and inform employees, clients/program participants and volunteers on how to file a complaint with Office of Civil Rights (OCR)?

Does the procedures for filing a discrimination complaint include the following:

A process for accepting and investigating complaints within the organization (in-house)?

A 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.

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.

Contact information for the aforementioned agencies (OCR, CVAD or ICRC) should be included in procedure/policy. [Chapter 24 Discrimination/Complaint Process | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-24-discriminationcomplaint-process) of the grant manual has information for filing a discrimination complaint with CVAD.

**Notice of Non-Discrimination Basis of Disability**

Grantee’s policies should provide notification to employees and clients that they do not discriminate on basis of disability. (Is it part of website, hiring application, postings, policy in policy manual, posting visible to employees, etc.?)

**Meaningful Access to Limited English Proficiency (LEP) Individuals**

Grantee’s procedures should how written procedure for steps to be taken by employees on how services are provided to those that have LEP? (Procedure should explain how to access translation services for individuals with LEP).

**Findings of Discrimination**

Grantee must forward any findings of discrimination to CVAD and OCR.

**Provide Services Regardless of Religious Beliefs**

Grantee must provide services regardless of religious beliefs.

**If organization/grantee conducts explicitly religious activities, then the grantee**

**Must have a mechanism to notify program participants that:**

Your organization does not 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.

If the victim/client objects to the religious character of the organization, the organization will make a reasonable effort to provide a referral for similar services in close proximity.

If the organization has hiring practices favoring co-religionists, they should have sent a Certificate of Exemption to CVAD.

# Non-Profit Board Information – Only pertains to non-profit organizations

This is pertinent to non-profit organizations and does not apply to governmental boards.

Is there documentation that the Board meets regularly? (minutes, by-laws, etc.)

Do the board meeting minutes include detailed discussion of what occurred at the meeting, who attended, and decisions made?

Is there documentation that the Board discusses the organization’s fundraising plan and/or activities?

Do board meetings reflect discussion and decisions regarding financial oversight as well as program/policy oversight?

# Non-Profit Board By-Laws – Only pertains to non-profit organizations

Do the By-laws include items such for the operation of the organization’s board of directors such as:

Size and duties of Board membership, including selection, terms of office and removal of members?

Selection, succession and duties of chairperson and officers?

Fiduciary oversight?

Conflict of interest?

Indemnification?

Regularly scheduled meetings?

Calling and conducting special meetings?

Taking and transcribing the minutes?

Quorum requirements?

Conducting an annual performance evaluation of the Chief Executive/Executive Director?

Does the Board have a self-identified victim/survivor?

# Confidentiality Policy/Manual – Applies to Foundational Victim Services (DAC, SAC, Shelter, SOH/OVC, CSP) and VOCA Initiatives

See information regarding confidentiality in the CVAD Grants Manual at [Chapter 7 Confidentiality & Informed Consent | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-7-confidentiality--informed-consent).

Does the policy address how the organization will protect clients’ confidentiality and the

responsibility of staff, volunteers, and board members to protect client confidentiality?

Does the policy address how the organization secures victim records and who has access

to the client records?

Does the policy address that confidentiality statements need to be signed by all staff,

volunteers, interns, board members, etc.?

Does the policy include the use of a “Release of Information” form for the organization to

obtain consent from the client to release their information? You can find more

information about releases in CVAD Grants Manual at [Release | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-7-confidentiality--informed-consent/release).

Is there a policy on breach of personally identifying information and does the policy require the agency 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.](https://www.iowaattorneygeneral.gov/manual/chapter-1/certified-assurances)

# Personnel Policies/Manual – All Grantees

See information regarding personnel policies in the CVAD Grants Manual at [Personnel Policies and Procedures | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-5-policies-and-procedures/personnel-policies-and-procedures).

Does the policy outline the hiring process of staff?

Including advertisements/recruitment, interviewing, selection, and screening?

Does the policy include ongoing supervision of employees and how often performance

evaluations are conducted.

Does the policy outline that the following items should be contained in the personnel

record of each employee?

Job Description (including description of position and who the employee

reports to)

Organization Application or Resume

Reference Checks were conducted

Signed Confidentiality Form

Documentation showing child abuse and criminal background checks for staff

providing direct service

Training documentation

Employee evaluations

Signed Acknowledgement of Sexual Harassment Policy Form

Driving Record Check and proof of Liability Insurance if transporting clients in

personnel vehicles.

Does the policy outline time and attendance records for each employee?

# Policies & Procedures that Outline Guidelines for Service Delivery

See information regarding service standards in the CVAD Grants Manual at [Chapter 8 Service Standards | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-8-service-standards).

Does the organization have policies and procedures that guide the administration of

services to victims (counseling, legal services, shelter, therapy, etc.)?

Do the policies and procedures describe the standard and components/activities in each

of the services?

# Volunteer Policies/Manual – Any Grantee Receiving Victims of Crime Act (VOCA or VA) funds – Includes Victim Witness Coordinators

See information regarding screening of volunteer and information to keep in volunteer files at [Personnel Policies and Procedures | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-5-policies-and-procedures/personnel-policies-and-procedures) in the CVAD Grants Manual. Please see [Grant Accountability Requirements | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-3-financial-requirements/grant-accountability-requirements) in the CVAD Grants Manual regarding utilizing volunteers as match. Reminder: fundraising and lobbying activities by volunteers are not eligible activities for match.

All grantees receiving VOCA funds must have at least 1 volunteer for 1 volunteer hour annually (for every year of the contract) as it is a requirement of VOCA funds. Please contact your grant manager if you need assistance on how to utilize volunteers.

Does the organization have policies and procedures that address volunteer recruitment,

selection, screening, training, and supervision.

Does the policy describe the tracking and documenting of volunteer hours?

Does the policy outline the following items should be contained in the file of each

volunteer?

Job Description (including description of position and who the employee

reports to)

Organization Application or Resume

Reference Checks

Signed Confidentiality Form

Documentation showing child abuse and criminal background checks for staff providing direct service

Training documentation

Employee evaluations

Signed Acknowledgement of Sexual Harassment Policy Form

Driving Record Check and proof of Liability Insurance if transporting clients

**Volunteer Tracking Form** – Below is a checklist of items required in the volunteer tracking form that is used to track volunteer hours.

Does it have the name of the volunteer and volunteer signature?

Does it have the dates of volunteering?

Does it include hours worked (i.e., 9am-11am, etc.)?

Does it include a brief description of the type of volunteering (responded to hospital,

answered crisis line, compiled victim packets, etc.)?

Optional: Grantees may wish to include a check off for direct service or indirect services

on the form. Only direct service can be utilized for match on the VOCA grant funds.

Optional: Grantees may wish to include a line for the total volunteer hours on the form

for ease in tabulating hours.

# Grievance Policy and Procedures – All Grantees

Grievance procedures are required for victims, employees, and volunteers. See information regarding requirement of grievance procedures/policy at [Required Policies and Procedures | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-2/required-policies-and-procedures) in CVAD grants manual. See [Chapter 24 Discrimination/Complaint Process | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-24-discriminationcomplaint-process) in the CVAD grants manual on how to do the following:

* service standards online complaint form
* discrimination online complaint form
* civil rights complaint process
* violation of victim service standards, contractual stipulation, or certified assurances

Does the policy include information for victims, employees, and volunteers on filing a

grievance/complaint for a potential violation of a victim service program’s service

standards, contractual stipulation and/or certified assurances?

Does the policy stipulate the use of the online complaint form created by CVAD? See

Chapter 24 of the CVAD grants manual at [Chapter 24 Discrimination/Complaint Process | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-24-discriminationcomplaint-process)

# Sexual Harassment Policy – All Grantees

Sexual harassment policy is required for victims, employees, and volunteers. See information regarding requirement of grievance procedures/policy at [Required Policies and Procedures | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-2/required-policies-and-procedures) in CVAD grants manual.

Does the policy explain what sexual harassment can include, such as:

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

Does the policy include the process for filing a grievance of sexual harassment by a staff

member, client, victim, or volunteer?

Does the process take into consideration how to file a complaint against a supervisor,

administrator or director?

Does the policy include the requirement for current and new staff and volunteers to sign

an acknowledgement form that they have reviewed and understand the sexual

harassment policy?

For OVW grantees: The 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.

# Shelter/Housing Packet – Grantees providing shelter/housing services

Does the shelter provide an informational packet of information to the shelter resident upon intake that includes:

Orientation to the shelter

Resident rights and responsibilities

Confidentiality and release of information

Shelter living guidelines

Emergency protocols and emergency exits

Security of residents and their belongings

Prohibition of weapons

# Housing Assessment Tool – Grantees providing shelter/housing services

Does the assessment tool collect information on individuals needed to make

recommendations on housing options and referrals to available services?

Does the assessment tool collect information necessary to assist in determining the

immediacy of need and eligibility for housing and services?

Does the assessment tool provide options to the individual to make informed decisions

on what will best meet their needs?

# Domestic Violence Procedure/Protocol/Standard Operational

# Procedures – Only STOP VAWA Prosecutors and Law Enforcement Funded

# for Domestic Violence prosecution or investigation/follow-up or response.

Is it specifically devoted to preventing, identifying, and responding to violent crimes

against women, including the crimes of domestic violence, dating violence, and stalking,

as well as the appropriate treatment of victims?

Is it supporting formal and informal statewide, multidisciplinary efforts to coordinate

the response of state law enforcement agencies, prosecutors, courts, victim services

organizations, and other state agencies and departments, to violent crimes against

women, including the crimes of domestic violence, dating violence, and stalking?

# Sexual Assault Procedure/Protocol/Standard Operating Procedures

# – Only STOP VAWA Prosecutors and Law Enforcement Funded for Sexual Assault

# prosecution or investigation/follow-up or response.

Is it specifically devoted to preventing, identifying, and responding to violent crimes

against women, including the crime of sexual assault, as well as the appropriate

treatment of victims?

Is it supporting formal and informal statewide, multidisciplinary efforts to coordinate

the response of state law enforcement agencies, prosecutors, courts, victim services

organizations, and other state agencies and departments, to violent crimes against

women, including the crime of sexual assault?

Does it include how they are strengthening the investigation and prosecution of sexual

assault cases and the appropriate treatment of victims?

# Drug-Free Workplace Policy– All Grantees

All grantees must have a drug-free workplace policy which is referenced in the CVAD grants manual at [Required Policies and Procedures | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-2/required-policies-and-procedures).

Does the policy 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?

Does the policy discourage alcohol and drug abuse and encourage treatment?

Does the policy acknowledge that drug and alcohol dependencies is a health problem

and encourage those to seek treatment who do experience alcohol and drug abuse

problems?

Does the policy discuss the organization having a drug-free awareness program?

Does the policy make it a requirement that the employee must notify the organization in

writing of a criminal drug statute conviction occurring in the workplace no later than

five calendar days after conviction?

Does the policy include the organization informing CVAD within 10 calendar days after

the conviction of an employee of the organization, of such conviction?

Does the policy include actions the organization can take with an employee who has

received a criminal drug statute conviction?

# Non-Violence in the Workplace Policy – All Grantees

All grantees must have a non-violence in the workplace policy which is referenced in the CVAD grants manual at [Required Policies and Procedures | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-2/required-policies-and-procedures).

Does the policy include information that the organization will maintain a workplace

environment free from threats and acts of violence?

Does the policy include a list of behaviors, though not exhaustive, as examples of conduct

that are prohibited such as:

Causing physical injury to another person

Acting out 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

who carry a weapon in performance of their work/duties)

Does the policy include how someone reports workplace violence, which could also be

reported anonymously?

# On-the-Job Seatbelt Policy – All Grantees

All grantees must have an on-the-job seatbelt policy in the workplace policy which is referenced in the CVAD grants manual at [Required Policies and Procedures | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-2/required-policies-and-procedures).

Does the policy require the organization’s staff, volunteers, and contractors to use their

seat belt when operating organization-owned, rented or personally owned vehicles?

# Policy Banning Texting While Driving – All Grantees

All grantees must have a policy banning employees, contractors/subcontractors and volunteers from texting while driving which is referenced in the CVAD grants manual at [Required Policies and Procedures | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-2/required-policies-and-procedures).

Does the policy ban the organization’s staff from text messaging while driving any

vehicle during the course of performing work under CVAD grant-related activities?

Does the policy include workplace safety information and other awareness activities to

decrease crashes caused by distracted drivers?

# Record Retention Policy – All Grantees

All grantees must have a records retention policy which is referenced in the CVAD grants manual at [Chapter 22 Retention of and Access to Records | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-22-retention-of-and-access-to-records)**.**

Does the policy address how long all closed and inactive client files shall be retained?

Does it also include information on the destruction of all closed and inactive client files?

Does the policy address how long final financial and program reports and supporting

document concerning a CVAD-funded project(s) shall be retained?

Does the policy address who has access to grant-related books, documents, papers or

other records associated with CVAD funding?

# Nepotism Policy – All Grantees

All grantees must have a nepotism policy which is referenced in the CVAD grants manual at [Required Policies and Procedures | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-2/required-policies-and-procedures).

Does the policy address the prohibition of hiring relatives of an employee or non-profit

board member?

# Conflict of Interest Policy – All Grantees

All grantees must have a conflict of interest policy which is referenced in the CVAD grants manual at [Required Policies and Procedures | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-2/required-policies-and-procedures).

Does the policy explain what qualifies as a conflict of interest such as “a transaction or

arrangement that could benefit an officer, director, or employee?”

Does the policy address avoiding any action that might result in, or create the

appearance of conflict of interest? This may include, but not limited to:

Using his or her official position for private gain;

Giving preferential treatment to any person;

Employees’ ability to use their position with the company to their personal

advantage

Does the policy establish procedures when individuals (Board of Directors, Organization

staff, etc.), who have a conflict of interest, will be excused from voting and/or

participating in discussions?

# Policy Restricting Lobbying Activities – All Grantees

All grantees must have a conflict of interest policy which is referenced in the CVAD grants manual at [Required Policies and Procedures | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-2/required-policies-and-procedures). Please see the lobbying section in the CVAD grants manual at [Lobbying | Iowa Attorney General](https://www.iowaattorneygeneral.gov/manual/chapter-17-unallowable-costs/lobbying).

Does the policy restrict lobbying activity with federal funds?

If a 501(c)(3), does the policy restrict from engaging in partisan political activities per

IRS Sec. 501(c)(3) (IRS, 2017)?