



Site Visits, Risk Assessments and Findings ... Oh My: Why Does the Virginia Department of Criminal Justice Services (DCJS) Conduct Site Visits?

Chrissy Smith, *Victims Services Program Specialist*

Have you ever heard of the Code of Federal Regulations (2 C.F.R.) Uniform Guidance? [2 C.F.R Part 200](#) establishes *administrative requirements, cost principles, and audit requirements for Federal awards to non-Federal entities*. It requires State Administering Agencies (SAA), like DCJS, to evaluate and monitor subgrantees to ensure compliance with federal and state regulations. DCJS developed risk-based [policies and procedures for grant monitoring](#). Grant monitors conduct site visits based on this policy and procedures. Bottom line, it's part of receiving and awarding federal and state grants.

What factors does the risk assessment consider and how does it determine the site visit schedule?

At the beginning of each grant cycle, grant monitors complete risk assessments for all grantees. Through the risk assessment, monitors assign predetermined values depending on the answers to the following factors:

- Total dollar amount of grant award
- Timeliness of financial reporting to DCJS
- Results of external audits (including any results of a Single-Audit, if applicable)
- When a site visit was last conducted
- Timeliness of programmatic progress reporting to DCJS
- Turn-over of DCJS-funded key staff
- Number of years receiving grants through DCJS
- Other issues of noncompliance and recurring or unresolved issues

Based on the results of the risk assessment, grantees are assigned a risk level, which determines the frequency of monitoring. High Risk (14 or higher) sub-grantees are monitored annually with a review of at least 20 randomly selected individual expenditure lines. Moderate risk (7–13) sub-grantees are monitored every two years, and low risk (6 or lower) subgrantees are monitored every four years.

What is involved in a site visit?

Site visits require a lot of preparation from both the grantee and the monitor as the visit will cover the current grant year plus the three previous years. The monitor reviews all DCJS grant applications, status reports, financial claims, goals and objectives of grant funded activities, budgets, personnel descriptions and the special conditions, making note of any items needing clarity or concerns. The grantee must gather their records per the [Items for Review During On-site Monitoring Visits](#) and [Victims Services Grant Programs Monitoring Tool](#) documents, which are shared with the grantee prior to the site visit.

While onsite, monitors tour the facility looking at the different spaces grant funded activities take place, and they meet the staff. Next, an Entrance Conference is conducted with the three authorized officials (Finance Officer, Project Director, and Project Administrator) to learn about the program and services provided, and to answer any preliminary questions. Monitors meet individually with the authorized officials, all grant funded staff, and anyone involved in the financial and programmatic management of

the grant. Monitors review policies and procedures, financial records, grant management documents and performance data as well as other relevant documents. Monitors use the [Items for Review During On-site Monitoring Visits](#) and [Victims Services Grant Programs Monitoring Tool](#) documents to ensure all requirements are met. At the end of the site visit, monitors conduct an Exit Conference when they will review any preliminary findings and next steps, address any concerns and request additional documentation, if needed.

What is the timeline for site visits?

Per the monitoring policy, monitors are required to give a grantee 30 calendar days' notice of a site visit unless an "emergency" visit is required. Once a date is selected, the monitor will send a formal letter with the [Items for Review During On-site Monitoring Visits](#) and [Victims Services Grant Programs Monitoring Tool](#) documents.

The length of time a monitor spends on-site depends on the size of the agency, the number of grants awarded by DCJS to the agency, the number of grant-funded staff, the risk assessment score, and any technical assistance required. Monitors have the option to conduct a virtual site visit or a hybrid visit, where documentation review and some interviews are done in person and some grant funded staff and/or authorized official interviews are conducted virtually in the surrounding days.

After the site visit, the monitor reviews additional documentation, if needed, and has 90 days to issue a Post Review Letter, which documents recommendations for corrective actions. The monitor will review the letter with the authorized officials and the grantee will have 45 days to submit any required corrective actions. Monitors will review the submitted corrective action documentation and request any additional documentation, if needed. Once the corrective action meets the requirements, the monitor will issue a site visit closure document within 30 days.

What are some common findings?

Deficiencies in the Financial Accounting System:

Per the [DOJ Grants Financial Guide](#), the grantee's accounting system must be able to track each award separately by the different funding sources (Federal, State, match, etc.). This includes having an account structure to separately track the receipt and expenditures of the funding sources. All supporting documentation must be maintained on-site.

Unallowable or Unallocated Cost:

All costs charged to the grant must be allowable, reasonable, allocable, and necessary under the grant program guidelines. If the cost is not in the approved OGMS budget it is not an allowable cost and should not be charged to the grant. If you are unsure if a cost is allowable or have a unique situation, refer to the grant guidelines and award conditions. If the item or activity is not in the approved budget, a [budget amendment](#) might be required and must be approved before funds can be obligated/expended. For questions, contact your grant monitor.

Time and Effort Tracking and Reporting:

Per the [DOJ Grants Financial Guide](#), charges made to Federal awards for salaries, wages, and fringe benefits must be based on records that accurately reflect the work performed and comply with the established policies and practices of the organization. See [2 C.F.R. § 200.430](#) and [§ 200.431](#). Charges must be supported by a system of internal controls that provides reasonable assurance that the charges are accurate, allowable, and properly allocated. Documentation for charges must be incorporated into the official records of the organization. Support must reasonably reflect the total activity for which the

employee is compensated by the organization and cover both federally funded and all other activities. Additionally, records must be certified/signed by the employee and approved by a supervisor with firsthand knowledge of the work performed. The percentage charged to the grant, as listed in OGMS, should correspond to the percentage of time spent on the grant funded activities on the timesheet or effort tracking report. An example of a timesheet can be found on the [Victim Services Grant Management Resources webpage](#).

Unallowable Activities:

The DCJS Victim Services Team administers and monitors six grant funded programs; American Rescue Plan Act (ARPA), Sexual Assault Services Program (SASP), Victim/Witness Grant Program (VWGP), Virginia Sexual & Domestic Violence Victim Fund (VSDVVF), Virginia STOP Violence Against Women Act (VSTOP), and Victims Services Grant Program (VSGP). Each grant program has specific grant guidelines which outlines the allowable and unallowable activities. For example, [FY22-23 VWGP Program Guidelines](#) states, *some unallowable costs include the following: lobbying; research and studies; active investigation and the prosecution of criminal activities; fundraising; and capital expenses (including construction)*. Other examples of unallowable activities include working with youth (under the age of 11) under the VSTOP grant, providing domestic violence services under the SASP grant, and fundraising and lobbying (unallowable under all six grant programs).

That's a wrap...

I love conducting site visits because it allows me to learn about the programs, see the great work and services they are providing to crime victims and provide technical assistance, if needed. We understand site visits are stressful for the grantees, but all DCJS grant monitors are willing to work with programs and are here to support the agencies, because we want to see programs succeed knowing how much the services are needed in the state.

CITED INFORMATION

U.S. Department of Justice Office of Justice Programs, February 2023, DOJ Grants Financial Guide 2022, OJP, <https://www.ojp.gov/doj-financial-guide-2022>

National Archives, Code of Federal Regulations A point in time eCFR system, (2 C.F.R.) Uniform Guidance, [eCFR :: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)

Virginia Department of Criminal Justice Services, Grant Monitoring Policy and Procedures, https://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/dcjs_monitoring_policy_4_8_21_final_3.pdf

Virginia Department of Criminal Justice Services, Items for Review During On-site Monitoring Visits, <https://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/victims-services/forms/items-review-during-site-visit.pdf>

Virginia Department of Criminal Justice Services, Victims Services Grant Programs Monitoring Tool, https://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/monitoring_tool_with_federal_cr_checklist_2022.pdf

Virginia Department of Criminal Justice Services, Grant Management Resources, <https://www.dcjs.virginia.gov/victims-services/grant-management-resources>

Virginia Department of Criminal Justice Services , Virginia Victim Witness Grant Program (VWGP) For Continuation Applicants Only Program Guidelines and Application Procedures State Fiscal Years 2022 and 2023, [fiscal-year-2022-2023-virginia-victim-witness-grant-program-guidelines.pdf](#)

Virginia Department of Criminal Justice Services, Virginia Services, Training, Officers, Prosecution (VSTOP) Formula Grant Program For Continuation Applicants Program Guidelines and Application Procedures Calendar Years 2022 and 2023, <https://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/grants/cy-22-23-violence-against-women-v-stop/cy-22-23-violence-against-women-v-stop-guidelines.pdf>