

# Dane County Contract Cover Sheet

Res 341  
BAF# 19132  
Significant

Dept./Division	Human Services
Vendor Name	State of WI - DOJ
Vendor MUNIS #	2155
Brief Contract Title/Description	DOJ - VOCA Grant
Contract Term	10/1/19 - 9/30/20
Total Contract Amount	\$123,528 (grant) / \$30,882 (Match)

Contract #	13833
Addendum	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Type of Contract	
<input type="checkbox"/>	Dane County Contract
<input checked="" type="checkbox"/>	Grant
<input type="checkbox"/>	County Lessee
<input type="checkbox"/>	County Lessor
<input type="checkbox"/>	Intergovernmental
<input type="checkbox"/>	Purchase of Property
<input type="checkbox"/>	Property Sale
<input type="checkbox"/>	Other

<b>Purchasing Authority</b>	<input type="checkbox"/> \$10,000 or under - Best Judgment (1 quote required)	
	<input type="checkbox"/> Between \$10,000 - \$35,000 (\$0 - \$25,000 Public Works) (3 quotes required)	
	<input type="checkbox"/> Over \$35,000 (\$25,000 Public Works) (Formal RFB/RFP required)	RFB/RFP #
	<input type="checkbox"/> Bid Waiver - \$35,000 or under (\$25,000 or under Public Works)	
	<input type="checkbox"/> Bid Waiver - Over \$35,000 (N/A to Public Works)	
	<input type="checkbox"/> N/A - Grants, Leases, Intergovernmental, Property Purchase/Sale, Other	

MUNIS Req.	Org Code	Obj Code	Amount	\$
Req #	Org Code	Obj Code	Amount	\$
Year	Org Code	Obj Code	Amount	\$

<b>Resolution / Addendum Form/ N/A</b>	A resolution is required if the contract exceeds \$100,000 (\$40,000 Public Works). A copy of the Resolution must be attached to the contract cover sheet.		
	<input checked="" type="checkbox"/> Resolution is required.		Res #
	<input type="checkbox"/> Addendum Form required.		Year
	<input checked="" type="checkbox"/> N/A		347 2019

<b>Domestic Partner</b>	Does Domestic Partner Equal Benefits Requirement Apply? <input type="checkbox"/> Yes <input type="checkbox"/> No
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Contract Review/Approvals				
Initials	Dept.	Date In	Date Out	Comments
MJ	Received by DOA	11/13/19		
cu	Controller		11/14/19	
PCP	Purchasing	11/15/19	11/15/19	
NA	Corporation Counsel			See "i" below
JA	Risk Management	11/14/19	11/14/19	
	County Executive			

Dane County Dept. Contact Info	Vendor Contact Info
Name: Spring Larson, Contract Coord. Assistant	Name: State of WI - DOJ - Office of Crime Victim Services
Phone #: 608-242-6391	Phone #: Michelle Viste 608-264-9497
Email: Larson.spring@countyofdane.com	Email:
Address: 1202 Northport Drive, Madison WI 53704, Rm 454	Address: 17 West Main Street, Madison WI 53707

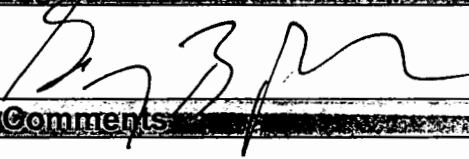
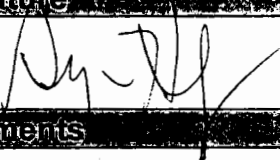
<b>Human Services Only</b>	a. Dane County Res. #	NA	Approvals	Initials	Date
	b. Budget/Personnel Required		g. Accountant	MJ	10/18/19
	c. Program Manager Name	Freeman	h. Supervisor	cu	10-18-19
	d. Current Contract Amount	\$ 0.00	i. Corporation Counsel	JA	10/20/19
	e. Adjustment Amount	\$123,528	j. To Provider		
	f. Revised Contract Amount	\$123,528	k. From Provider		

**Department Head Approval/Shawn Tessmann, Director**

Shawn Tessmann 10/31/19  
Hux

Certification The attached contract is a	
<input type="checkbox"/>	Dane County Contract <u>without</u> any modifications.
<input type="checkbox"/>	Dane County Contract <u>with</u> modifications. <b>The modifications have been reviewed by:</b>
<input checked="" type="checkbox"/>	Non-standard contract.

**Contracts Exceeding \$100,000**  
Major Contracts Review – DCO Sect. 25.11(3)

Director of Administration	<b>Signature</b>	<b>Date</b>
		11.15.19
	<b>Comments</b>	
Corporation Counsel	<b>Signature</b>	<b>Date</b>
		10-30-19
	<b>Comments</b>	

## County of Dane

### Correspondence Memorandum

Date: October 18, 2019

To: Joe Parisi  
County Executive

From: Mary Jacobson, Accountant  
Human Services

Description: These are funds from the DOJ that support the Adult Protective Services Unit's VOCA (Victim of Crime Act) program.

Amount \$123,528.00

Funding Source: State of Wisconsin – Department of Justice

2019 RES-347

ACCEPTING VICTIMS OF CRIME ACT (VOCA) GRANT FUNDS FROM  
THE STATE OF WISCONSIN DEPARTMENT OF JUSTICE  
DCDHS – ACS DIVISION

The Wisconsin Department of Justice has awarded Victims of Crime Act (VOCA) grant funds to Dane County to address the needs of particular victims of crime. The Dane County Department of Human Services (DCDHS) has long received VOCA grant funds to serve older adults who have been the victims of crime. Beginning October 1, 2019, DCDHS is receiving additional grant funds to support people with intellectual/developmental disabilities (I/DD) who have also been victims of crime.

When older adults and people with I/DD are victimized, they often suffer greater physical, mental, and financial injuries than the general population, therefore they may need specialized support and understanding to recover. This funding will allow DCDHS to assist older adults and people with I/DD to overcome the trauma of the crime, understand their options, and exercise their legal rights as they are able. The grant will serve Dane County adults over the age of 60 as well as adults and children with I/DD who are victims of a violent, nonviolent, and/or financial crime.

VOCA grant funds include reimbursement for personnel costs, supplies for outreach efforts, and emergency funds for crime victims served by the project. DCDHS will also use grant funds to initiate a contract with Heart Consulting, LLC, which specializes in providing counseling services to the I/DD population and will work with those individuals referred by project staff.

The total amount of the VOCA grant funds awarded to DCDHS by the State of Wisconsin total \$123,528 for the period of October 1, 2019 – September 30, 2020. This resolution authorizes the use of funds in addition to those that were already budgeted.

**NOW, THEREFORE, BE IT RESOLVED** that the following new expenditure accounts be added to the Adult Protective Services section in the Department of Human Services; and

**BE IT FURTHER RESOLVED** that the following revenue account be credited to the General Fund and transferred from the general fund to the following expenditure accounts in the Department of Human Services:

Revenue Account Number	Account Title	Amount
43000      85575	Victims of Crime Act (VOCA)	\$ 54,800
Expenditure Account Number	Account Title	Amount
40000      20648	Conference and Training	\$ 16,450
43000      21642 (New)	VOCA Outreach Supplies	\$ 1,973
43000      21641 (New)	VOCA Emergency Victim Assistance	\$ 13,777
43000      35507 (New)	Counseling/Therapeutic Resources	\$ 22,600

**NOW, THEREFORE, BE IT FINALLY RESOLVED** that monies remaining in these budget lines at the close of 2019 shall be carried forward into the 2020 budget.

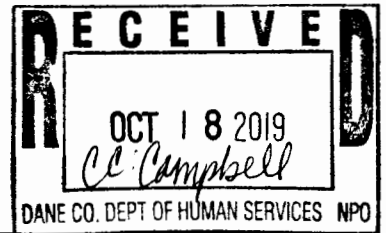


STATE OF WISCONSIN  
DEPARTMENT OF JUSTICE

13833

APPROVED  
CORPORATION COUNSEL

10-30-19



Josh Kaul  
Attorney General

Michelle Viste, Executive Director  
Office of Crime Victim Services  
17 West Main Street  
P.O. Box 7951  
Madison, WI 53707-7951

(608) 264-9497  
(608) 264-6368 FAX  
(800) 947-3529 TTY

VICTIMS OF CRIME ACT (VOCA) GRANT AWARD  
VOCA: Dane County APS Victim Advocate Project  
2018-VO-01-15259

The Wisconsin Department of Justice (DOJ), hereby awards to **Dane County**, (hereinafter referred to as the **Subgrantee**), the amount of **\$123,528.00** for programs or projects pursuant to the federal the Victims of Crime Act of 1984 (VOCA).

This grant may be used until **September 30, 2020** for the programs consistent with the budget and general conditions in Attachment A, subject to any limitations or conditions set forth in Attachments B and/or C, if included.

The Subgrantee shall administer the programs or projects for which this grant is awarded in accordance with the applicable rules, regulations, and conditions of the Wisconsin Department of Justice. The submitted application is hereby incorporated as reference into this award.

*This grant shall become effective, and funds may be obligated (unless otherwise specified in Attachments A and/or B) when the Subgrantee signs and returns one copy of this grant award to the Wisconsin Department of Justice.*

*Michelle L. Viste*

Michelle L. Viste  
Executive Director  
Office of Crime Victim Services

October 1, 2019  
Date

The (Subgrantee), **Dane County**, hereby signifies its acceptance of the above-described grant on the terms and conditions set forth above or incorporated by reference therein.

SUBGRANTEE: **Dane County**

BY: \_\_\_\_\_

NAME: **Joe Parisi**

TITLE: **County Executive**

\_\_\_\_\_  
Date

**WISCONSIN DEPARTMENT OF JUSTICE  
ATTACHMENT A**

Subgrantee: Dane County

Project Title: VOCA: Dane County APS Victim Advocate Project CFDA #16.575

Grant Period: From October 1, 2019 To September 30, 2020

Grant Number: 2018-VO-01-15259 DUNS Number: 076148766

Federal Award Identification Number (FAIN) and Federal Award Date: 2018-V2-GX-0005 - 08/09/2018

Federal Awarding Agency: US Department of Justice Office for Victims of Crime

**APPROVED VICTIMS OF CRIME ACT (VOCA) BUDGET**

		<u>Federal &amp; Match</u>
Personnel		\$78,747
Employee Benefits		\$20,864
Staff Development		\$18,800
Travel (Including Training)		
Equipment		
Supplies & Operating Expenses		\$1,972
Consultants/Contractual		\$20,250
Indirect		
Other		\$13,777
<b>FEDERAL TOTAL</b>	<u>\$123,528</u>	
<b>LOCAL CASH MATCH</b>	<u>\$30,882</u>	
<b>LOCAL IN-KIND MATCH</b>		
<b>TOTAL APPROVED BUDGET</b>	<u>\$154,410</u>	<u>\$154,410</u>

See your E-grants Application for details on the approved budget

FUNDING SOURCE		
Federal Share		\$123,528
Local Share	Cash	\$30,882
	In-Kind	
<b>Total Approved Funding Source</b>		<u>\$154,410</u>

**WISCONSIN DEPARTMENT OF JUSTICE  
CONDITIONS OF AWARD  
Attachment B**

Dane County  
VOCA: Dane County APS Victim Advocate Project  
2018-VO-01-15259

**Special Conditions requiring a specific response:**

- **Emergency Financial Assistance Policy**  
The subgrantee shall establish and submit to OCVS within 30 days of the award date written policies specifying the criteria and operation of its emergency financial assistance fund.
  - These policies shall include:
    - A. The types of expenses for which emergency funds may be used;
    - B. Costs covered by this fund shall not supplant funds or services otherwise generally available from other community resources or for which a charge is not normally imposed;
    - C. Fiscal and program procedures, controls and reports. It must be verified that the expenses are a direct result of the crime. The subgrantee shall retain all source documents relating to emergency fund disbursements.
    - D. Specific information regarding individual recipients, the type of crime, the need for and use of such emergency financial assistance.
- **VOCA Guidelines - Staff Development Reminder**
  - All out of state travel must be approved in advance by the VOCA Grants Specialist.
  - The agency's Program Director is responsible to ensure that direct service staff attending trainings, conferences, or seminars, are informed of the VOCA Program Guidelines, and attend only those sessions that are VOCA allowable.
  - See the VOCA Program Guidelines: D. Ineligible Services and Activities
    - 1. Lobbying and administrative advocacy
    - 2. Studies and research
    - 3. Prosecutions or investigation of criminal activity and activities directed at improving the criminal justice system's effectiveness and efficiency (some examples include, witness notification and management activities, expert witnesses, witness protection.)
    - 4. Fundraising activities
    - 6. Administrative staff expenses (salaries, fees and reimbursable expenses for administrators, board members, executive directors, consultants, coordinators and other individuals unless incurred while providing direct victim services) except as they apply to direct administration of VOCA funding
    - 7. Activities exclusively related to crime prevention.
    - 8. Medical care not outlined specifically above.
- **Sub-Grant -Hearts Consulting, LLC.**
  - The subgrantee shall submit to the Office of Crime Victim Services a copy of all sub-contractual/Subgrant agreements funded under this sub-grant.
  - All such subcontracts are subject to approval by the Office of Crime Victim Services and shall comply with applicable VOCA Program Guidelines.
  - The subgrantee shall provide this agreement to the Office of Crime Victim Services within 30 days of the award date.

**Dane County agrees by acceptance of this grant award to the following general award conditions:**

**Allowable Expenses/Activities**

- The Subgrantee shall make expenditures with project funds (federal funds and local match) only for items contained in the approved project budget.
- All legal services provided under this subgrant shall be consistent with federal rules and state guidelines.
- VOCA funds may not be used for fundraising activities.
- All out of state training must be pre-approved by OCVS before making travel arrangements. This subgrant award agreement does not constitute pre-approval.
- Please consult the VOCA State Guidelines for further guidance.

**Reimbursements**

- Grant funds will be disbursed on a **reimbursement** basis either monthly or quarterly upon submission of a fiscal report in Egrants. All reimbursements are based on actual, allowable, paid expenditures. Subgrantee is responsible for maintaining accurate accounting records that support expenditures for this grant project.
- Reimbursement for travel will be limited to a maximum 51¢ per mile, \$82.00/night for lodging and \$38.00/day for meals (\$8 breakfast, \$10 Lunch and \$20 Dinner) in accordance with state rates.
- Reimbursement payments will be held for late program reports and OVC PMTs.
- Please note that requests for reimbursements may take 6 to 8 weeks for processing and payment. Agencies can help OCVS expedite the process by submitting fiscal reports by the deadline and ensuring that all calculations are correct and sufficient explanation of expenses is provided.

**Modifications**

- Budget changes in excess of 10% of the amount in the approved budget category or over \$500 (whichever is greater), alterations to the scope of the project, adjustments affecting a budget category that was not included in the original budget, or changes to indirect budget category require justification to and approval from WI DOJ.
- Budget modifications take effect on the date that the Grant Adjustment Notice (GAN) is signed and approved by OCVS. No new expenses can be incurred until the GAN is approved.
- Personnel changes or additions require a modification in Egrants. Modifications must be submitted during the month or pay period in which expenses are being incurred.
- Budget modifications can only apply to those allowable expenses within the same financial reporting period and cannot be used to retroactively charge off previously unreported expenses in order to fully expend the VOCA subgrant award.
- Requests for budget modifications during the final reporting period must be submitted to your grant manager via Egrants **at least 30 days prior to the end of your project period/grant cycle. VOCA budget modifications are due August 31 by 11:59pm in Egrants.**



- Modifications are also required for:
  - changes to or additions of personnel listed in the budget
  - changes in Project Director, Financial Officer, or Signing Official
  - changes in project scope

#### Match

- The Victims of Crime Act of 1984 (VOCA) requires a 20% of the total VOCA project cash or in-kind match for non-tribal programs unless a match waiver (full or partial) is granted by the WI DOJ.
- Match Documentation supporting the market value of in-kind match must be maintained in the award recipient files and therefore must be submitted with each reimbursement request. Please refer to the VOCA Program Guidelines for valuation of in-kind match.
- All funds designated as match are restricted to the same uses as the Victims of Crime Act (VOCA) Program funds and must be expended within the grant period. The agency must ensure that match is identified in a manner that guarantees its accountability during an audit.
- Match expenses must be reported on the same fiscal report during which the expenses were incurred.
- Subgrantees may not reduce or eliminate current appropriation level of the local matching funds during the grant period.

#### Records Management

- If the grant award budget contains wages, the subgrantee's records must be maintained in a form that, at any time, an auditor or DOJ representative would be able to identify the use of the Federal and Matching funds. These records should include information such as employee name, rate of pay; hours worked, and amount of time dedicated to the grant project.
- The agency accounting system and financial records will accurately account for funds awarded to them. Accounting systems must ensure that federal award funds are not commingled with funds from other sources. Funds specifically budgeted or received for one project may not be used to support another (including provided match).

#### Contractual/Consultants

- All procurement transactions, whether negotiated or competitively bid and without regard to dollar value, shall be conducted in a manner to provide maximum open and free competition.
- All sole source procurement requests shall be submitted to DOJ for review and approval.
- Fees for independent consultants may not exceed the federal rate of \$650.00 per eight-hour day, or \$81.25 per hour, unless **prior approval** is received from DOJ. Consultants, whether independent or employed by a commercial or nonprofit organization, who are contracted through a competitive bidding process are not subject to the maximum consultant rate threshold.

#### General

- All subrecipients will be required to send the Project Director and Financial Officer identified on the grant to an OCVS Grantee Orientation.
- It is a federal requirement that the subrecipient permit the pass-through entity (Wisconsin Department of Justice) and auditors to have access to the subrecipient's records and financial statements as necessary for the pass through entity to meet the requirements of 2 C.F.R. §200.

- All subgrantees must maintain registration on the System for Award Management (SAM).
- Grant recipient will work with OCVS during the first quarter of the grant period to create Goals and Objectives.
- To be allowable under a grant program, costs must be paid or obligated for services provided during the grant period. If obligated by the end of the grant period, payment must be made within 30 days of the grant period ending date.
- All program income generated as a direct result of this award shall be deemed program income and reported quarterly to DOJ on the Program Income/Expenditure Report form. Program income must be used for the purposes and under the conditions applicable to the award and must be expended during the grant period. Program income includes, but is not limited to, collection of registration fees, tuition fees, interest earned and royalties.
- Subgrantees should refer to the VOCA Program Guidelines found on the VOCA webpage at: <http://www.doj.state.wi.us/ocvs/not-crime-victim/victims-crime-act-voca>. The U.S. Department of Justice financial guide found at <http://ojp.gov/financialguide/DOJ/index.htm>. Subgrantees must comply with all provisions found in these documents.
- **Emergency Victim Assistance Funds**  
If applicable, the grant recipient shall establish and submit to OCVS within 30 days of the award date, or modification award date, written policies specifying the criteria and operation of its emergency financial assistance fund. These policies shall include:
  - The types of expenses for which emergency funds may be used;
  - Costs covered by this fund shall not supplant funds or services otherwise generally available from other community resources or for which a charge is not normally imposed;
  - Fiscal and program procedures, controls and reports. It must be verified that the expenses are a direct result of the crime. The subgrantee shall retain all source documents relating to fund disbursements;
  - Specific information regarding individual recipients, the type of crime, the need for and use of such emergency financial assistance.
- **Property and/or Equipment Inventory Report**  
OCVS will reimburse the grant recipient for the cost of approved Equipment and/or Property in the same manner as other expenditures. The following information must be submitted in Egrants to OCVS in an Inventory Report at the same time the reimbursement is requested in the Fiscal Report:
  - The date and the actual cost of the acquisition
  - The name of the title holder
  - A serial number or other unique identification numbers
  - The address where each item will be located
  - Any minor changes from the information contained in the original request. (Any significant or major deviations (e.g. item cost, use, etc.) from the information originally provided require advance approval from OCVS)

Please contact your OCVS Grant Manager for more information or refer to the applicable OCVS grant program guidelines.

**VICTIMS OF CRIME ACT GRANT PROGRAM  
ACKNOWLEDGEMENT NOTICE**

Subgrantee: Dane County Date October 2019  
Project Title: VOCA: Dane County APS Victim Advocate Project Grant No. 2018-VO-01-15259

The following reporting requirements apply to your grant award.

**SEMI-ANNUAL NARRATIVE** must be submitted and **completed in Egrants**. The semi-annual narrative report is due to OCVS on:  
4/30/2020

NOTE: Reports due in April include October through March program activity.

**FINANCIAL REPORTS** serve two functions: to report fiscal status and to request funds. The fiscal report reports are completed in Egrants and may be submitted monthly but, at a minimum, are due to OCVS on:  
1/30/2020                      4/30/2020                      7/30/2020                      10/30/2020 Final

NOTE: Reports due in January include October, November and December program activity.  
Reports due in April include January, February and March program activity.  
Reports due in July include April, May and June program activity.  
Reports due in October includes July, August and September program activity.

**PERFORMANCE MEASURES REPORT** must be submitted on a scheduled basis and **completed in the Office for Victims of Crime Performance Measurement Tool (OVC PMT)**: <https://www.ovcpmt.org>. (Further instructions and directions on using OVC PMT will be provided as the first deadline approaches). PMT reports are due in OVC PMT on:  
1/30/2020                      4/30/2020                      7/30/2020                      10/30/2020

NOTE: Reports due in January include October, November and December program activity.  
Reports due in April include January, February, and March program activity.  
Reports due in July include April, May, and June program activity.  
Reports due in October include July, August, and September activity.

**FINAL PERFORMANCE REPORT** is due **10/30/2020** and covers activities for VOCA project only for the entire grant period and is submitted in Egrants.

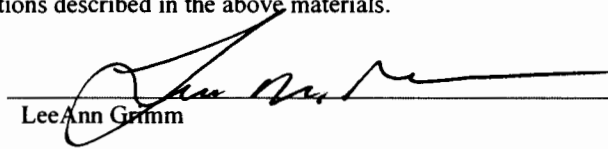
**EEOP CERTIFICATION FORM** The Office of Justice Programs requires **all** subgrantees complete the EEOP Certification form and submit it to the Office for Civil Rights. A copy of the certification completed online must be submitted to OCVS.

The Office of Justice Programs, Office for Civil Rights has an online Equal Employment Opportunity (EEO) Program Reporting Tool which allows for a streamlined submission process. Subgrantees can create an account, then prepare and submit your EEO certification form and, if required, create and submit an EEO Utilization Report. Please complete your EEO certification form or, if required, submit an EEO Utilization Report through the EEO Program Reporting Tool: <https://ocr-eeop.ncjrs.gov>.

**ACKNOWLEDGEMENT**

The materials referenced above were received and reviewed by the appropriate members of this organization. I also acknowledge receipt of the Grant Award and any attached Special Conditions, as well as receipt of the General Conditions which were previously provided in the Instructions for Filing and Application. I understand that this grant is awarded subject to our compliance with all Conditions, Regulations, and Obligations described in the above materials.

10/30/19  
Date

  
Lee Ann Grimm

, Project Director

**Victims of Crime Act**

**TERMS AND ASSURANCES OF SUBGRANT AWARD**

**I. SUBGRANTEE'S DUTIES**

The Subgrantee identified on the cover page of the Subgrant Award Agreement agrees to perform and accomplish the purposes and activities as specified in this Subgrant Award and Attachments relating to the establishment, operation, expansion and/or enhancement of services to victims of crime.

**II. STATE SUBGRANT AWARD - CONDITIONS AND TERMS OF PAYMENT**

A. The Wisconsin Department of Justice (hereafter referred to as "Department") shall award to the Subgrantee a sum not to exceed the amount indicated in Federal Total in the Approved Victims of Crime Act (VOCA) Budget Table on Attachment A of the attached Subgrant Award Agreement. Such sum shall be the total financial commitment of the Department contingent upon the Subgrantee meeting the total Local Match Requirement set forth in attached, "Approved Project Budget" and satisfactory compliance with all terms and requirements set forth herein.

B. The grant period for this award shall be from October 1, 2019 – September 30, 2020. Any continuation grant years after this grant period will require an application to be submitted by the Subgrantee. Future grant awards are contingent upon the availability of federal funds, and subgrant compliance with federal and state guidelines and award conditions. OCVS reserves the right to amend, change or reduce subgrant award amounts for each continuation grant year.

C. All funding obligations made under this Subgrant award are contingent upon availability of federal funds provided under the Victims of Crime Act (VOCA) of 1984, 42 USC 10601 et seq.

D. The Application as submitted by the Subgrantee, including any revisions made thereto, and which served as the basis for this Subgrant Award is incorporated into and made a part of this Subgrant Award, except that the Application shall be superseded by the express terms of this Subgrant Award, Attachments hereto or subsequent modifications approved by the Department. The Application is a material representation upon which reliance is placed when this Subgrant Award Agreement is made or entered into.

E. Subgrantees must submit a fiscal report in Egrants. Payments will be made to the Subgrantee agency or organization by the Department in periodic installments. All payments are based on actual reimbursements.

F. Failure to comply with any of the terms, conditions or requirements of the Victims of Crime Act, of this or of any previous Subgrant Award, or of any rules, regulations, guidelines or policies pertaining thereto may result in suspension, termination or repayment of funds. This provision applies to all requirements, including acts to be performed after the conclusion of the project period, such as those related to audit, financial and programmatic reporting or disposal of property.

G. The Department reserves the right, upon advance notice to the Subgrantee, to make reasonable adjustments, revisions and modifications to the amount, terms and scope of this Agreement as it deems necessary and consistent with the purposes and intent of the Victims of Crime Act.

**III. CORRESPONDENCE AND COMMUNICATIONS**

All official written correspondence and communications to the Wisconsin Department of Justice in connection with this Subgrant shall be directed to:

Office of Crime Victim Services  
Wisconsin Department of Justice  
P.O. Box 7951  
Madison, WI 53707-7951

#### IV. PROGRAM PERFORMANCE REPORT REQUIREMENTS

The Subgrantee will submit all required program performance reports and such other data or information as requested by the Department. Program reports shall be submitted on forms provided by the Department or as otherwise directed by the Department. The Department shall give the Subgrantee reasonable advance notice of the data to be provided, the time period to be reported upon and the date by which the information is to be submitted. Failure to submit required reports in a timely manner may constitute grounds for suspension, termination and/or repayment of payments made or to be made under this or any subsequent Subgrant Award.

#### V. FINANCIAL REPORT REQUIREMENTS

A. A fiscal report must be submitted to the Department within 30 days of the end of each month of the project period or, at the Subgrantee's option, within 30 days of the close of each calendar quarter (i.e. within 30 days of December 31, March 31, June 30, and September 30 of each year), or as otherwise directed by the Department.

B. The Subgrantee shall, unless otherwise approved by the Department, liquidate all obligations incurred under this award not later than 30 calendar days after the grant period or completion date as specified in this agreement.

C. The closeout of an award does not affect any of the following:

1. The right of the Department or the Federal awarding agency to disallow costs and recover funds on the basis of a later audit or other review.
2. The obligation of the Subgrantee to return any funds due as a result of later refunds, corrections or other transactions.
3. Audit requirements.
4. Property management requirements.
5. Records retention requirements.

#### VI. GENERAL REQUIREMENTS AND CONDITIONS

A. All requirements, conditions and regulations stated in the State VOCA Subgrant Guidelines, policies issued by the Department and rules, regulations or policies issued by the U.S. Department of Justice Office of Justice Programs (OJP) shall apply.

B. In the event there are conflicting or otherwise inconsistent policies, the following order of precedence shall apply:

1. Federal legislation;
2. Federal regulations, guidelines and policies, including applicable circulars issued by the Office of Management and Budget;
3. Policies issued in Office of Justice Programs, Office of the Comptroller, Financial Guide (current revised edition).
4. Terms and conditions of the Subgrant Award;
5. Program Guidelines, policies and directives issued by the Department.

C. VOCA Requirements: The recipient assures that the State and its subrecipients will comply with the conditions of the Victims of Crime Act (VOCA) of 1984, sections 1404(a)(2), and 1404(b)(1) and (2), 34 U.S.C. 20103(a)(2) and (b)(1) and (2) (and the applicable program guidelines and regulations), as required. Specifically, the State certifies that funds under this award will:

1. be awarded only to eligible victim assistance organizations, 34 U.S.C. 20103 (a)(2);
2. not be used to supplant State and locally public funds that would otherwise be available for crime victim assistance, 34 U.S.C. 20103(a)(2); and
3. be allocated in accordance with program guidelines or regulations implementing 34 U.S.C. 20103(a)(2)(A) and 34 U.S.C. 20103(a)(2)(B) to, at a minimum, assist victims in the following categories: sexual assault, child abuse, domestic violence, and underserved victims of violent crimes as identified by the State.

D. Applicability of Part 200 Uniform Requirements

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by DOJ in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements") apply to this award from OJP.

The Part 200 Uniform Requirements were first adopted by DOJ on December 26, 2014. If this award supplements funds previously awarded by OJP under the same award number (e.g., funds awarded during or before December 2014), the Part 200 Uniform Requirements apply with respect to all funds under that award number (regardless of the award date, and regardless of whether derived from the initial award or a supplemental award) that are obligated on or after the acceptance date of this award.

For more information and resources on the Part 200 Uniform Requirements as they relate to OJP awards and subawards ("subgrants"), see the OJP website at <https://ojp.gov/funding/Part200UniformRequirements.htm>.

Record retention and access: Records pertinent to the award that the recipient (and any subrecipient ("subgrantee") at any tier) must retain -- typically for a period of 3 years from the date of submission of the final expenditure report (SF 425), unless a different retention period applies -- and to which the recipient (and any subrecipient ("subgrantee") at any tier) must provide access, include performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. 200.333.

In the event that an award-related question arises from documents or other materials prepared or distributed by OJP that may appear to conflict with, or differ in some way from, the provisions of the Part 200 Uniform Requirements, the recipient is to contact OJP promptly for clarification.

E. If a project is not operational within 60 days of the original starting date of the project period, the Subgrantee must report in writing to the Department the steps taken to initiate the project, the reasons for the delay and the expected starting date.

F. If a project is not operational within 90 days of the original starting date of the project period, the Subgrantee must submit a second statement to the Department explaining the implementation delay. Upon receipt of the 90-day statement, the Department may cancel the project or may, where extenuating circumstances warrant, extend the implementation date of the project past the 90-day period.

G. All services provided by the Subgrantee pursuant to this Subgrant Award shall be performed to the satisfaction of the Department, as determined in the sole discretion of the Department, and in accord with all applicable Federal, State and local laws, ordinances, rules and regulations.

H. The Subgrantee shall notify the Department whenever it is unable to provide the required quality or quantity of services specified in this Subgrant. Upon such notification, the Department shall determine whether such inability will require revision or cancellation of this Subgrant.

I. The Subgrantee shall not receive, and may be required to repay, funds for work found by the Department to be unsatisfactory or performed in violation of or noncompliance with Federal, State, or local law, ordinance, rule, regulation or special condition applicable to this Subgrant Award.

J. The Subgrantee agrees to notify the Department whenever it is unable to comply with applicable Federal and State law. Upon such notification, the Department shall determine whether such inability will require revision or cancellation of this agreement.

K. The Subgrantee agrees to indemnify and save and hold harmless the Department, its agents and employees from any and all claims or causes of action arising from the performance of this Subgrant by the Subgrantee, its agents, employees or delegates. This clause shall not be construed to bar any legal remedies the Subgrantee may have for the Department's failure to fulfill its obligations pursuant to this Subgrant.

L. Any program change or modification in the project which in any way may affect the approved activities must be submitted in writing to and approved by the Department before such changes are implemented. Examples of such changes include:

1. Change in project site;
2. Changes which increase the total cost of the project;

3. Change in or temporary absence of the project director;
4. Transfer of project;
5. Successor in interest and name change agreements;
6. Budget adjustments requiring prior approval; and
7. Special conditions attainment.

Any such changes or modifications approved by the Department shall be incorporated into and made a part of this Subgrant.

M. The Subgrantee shall make expenditures with project funds (federal funds and local match) only for items contained in the approved project budget.

N. If the Subgrantee determines that changes in the approved budget items are necessary, the Subgrantee shall request review and approval from the Department and shall not expend until the Subgrantee receives approval to transfer funds from one budget item to another.

O. The Project Director shall inform the Department whenever it appears that the total Project expenditures for the entire project period will be at least \$2,500 less than the approved project budget. The Department reserves the right to reallocate such underspending to other agencies for uses consistent with VOCA.

P. All program income shall be returned to the Department, or, with the advance approval of the Department, used by the Subgrantee for a purpose which furthers the objectives of the project. Such income shall be reported on a separate form provided by the Department and submitted with the fiscal report. Program income may not be used as part of the Subgrantee's local match.

Q. The Subgrantee may subcontract part of this Subgrant only after approval by the Department. The Department may require the Subgrantee to submit a copy of the proposed subcontract to the Department prior to approval. The Subgrantee retains the responsibility for fulfillment of all terms and conditions of this Subgrant Award when it enters into subcontractual agreements.

R. If this Subgrant results in the development of materials, the Department reserves a royalty-free, nonexclusive, irrevocable license to reproduce, publish or otherwise use, and to authorize others to use, all materials from the approved project.

S. Any discovery or invention arising out of, or developed in, the course of work aided by this Subgrant, shall be promptly and fully reported to the Department.

T. The Subgrantee shall conduct all procurement transactions, regardless of whether by sealed bids or by negotiation and without regard to dollar value of the transactions, in a manner that provides maximum open and free competition.

U. The Subgrantee shall keep the Department advised of the name and qualifications of each person, including consultants and subcontractors, filling positions funded in whole or in part with federal funds under this Subgrant.

V. Prohibit use of funds for ACORN and its subsidiaries: Recipient understands and agrees that it cannot use any federal funds, either directly or indirectly, in support of any contract or subaward to either the Association of Community Organizations for Reform Now (ACORN) or its subsidiaries, without the express prior written approval of OJP.

W. Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), the Department encourages recipients and sub recipients to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this grant, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

X. The recipient understands and agrees that – (a) No award funds may be used to maintain or establish a computer network unless such network blocks the viewing, downloading, and exchanging of pornography, and (b) Nothing in subsection (a) limits the use of funds necessary for any Federal, State, tribal, or local law enforcement agency or any other entity carrying out criminal investigations, prosecution, or adjudication activities.

Y. All non-profit recipients of VOCA Assistance funding under this award are required to make their financial statements available online (either on the subrecipient's or another publicly available website). OVC will consider subrecipient

organizations that have Federal 501(c)(3) tax status as in compliance with this requirement, with no further action needed, to the extent that such organization files IRS Form 990 or similar tax document (e.g., 990-EZ), as several sources already provide searchable online databases of such financial statements.

Z. If the Subgrantee uses VOCA funds for gift cards, the Subgrantee shall have fiscal policies in place specific to the use of these cards, including:

1. How the program avoids misuse of gift cards/emergency assistance funds.
2. Gift cards must be kept in a secure location and access to them restricted. The programs fiscal policies must identify which position is responsible for keeping the gift cards as well as the intended use of the funds.
3. When a gift card is issued, the program must keep a log of the following:
  - a) Who the gift card was issued to and the intended use (do not use victim name if necessary, but must be able to track to the victim for audit purposes).
  - b) The amount of money on the gift card/card value.
  - c) Where the gift card was to (grocery store, gas card, etc.)
  - d) Prohibition of tobacco and alcohol purchases
4. Fuel cards can be provided to victims who have an established need. Volunteers and staff members are not to be issued fuel cards, but instead, should be reimbursed for travel occurring as a part of regular duties in accordance with the program's travel policy.
5. Grants Specialists conducting on-site grant monitoring visits with programs will verify log entries for the issuance of gift cards.

#### AA. Reclassification of various statutory provisions to a new Title 34 of the United States Code

On September 1, 2017, various statutory provisions previously codified elsewhere in the U.S. Code were editorially reclassified to a new Title 34, entitled "Crime Control and Law Enforcement." The reclassification encompassed a number of statutory provisions pertinent to OJP awards (that is, OJP grants and cooperative agreements), including many provisions previously codified in Title 42 of the U.S. Code.

Effective as of September 1, 2017, any reference in this award document to a statutory provision that has been reclassified to the new Title 34 of the U.S. Code is to be read as a reference to that statutory provision as reclassified to Title 34. This rule of construction specifically includes references set out in award conditions, references set out in material incorporated by reference through award conditions, and references set out in other award requirements.

AB. The Subgrantee, and any subrecipient ("subgrantee") at any tier, must comply with all applicable restrictions on the use of federal funds set out in federal appropriations statutes. Pertinent restrictions, including from various "general provisions" in the Consolidated Appropriations Act, 2018, are set out at <https://ojp.gov/funding/Explore/FY18AppropriationsRestrictions.htm>, and are incorporated by reference here.

Should a question arise as to whether a particular use of federal funds by a recipient (or a subrecipient) would or might fall within the scope of an appropriations-law restriction, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

#### VII. RECORDS AND REPORTS; PROPERTY/EQUIPMENT

A. The Subgrantee shall ensure that all records and reports required shall be maintained for a period of not less than three years after completion of this project, or until audits by the appropriate auditing agency have been completed and all questions arising from the audits have been resolved, whichever is earlier.

B. The Subgrantee shall allow inspection of records and programs, insofar as is permitted by Federal and State law, by representatives of the Department and its authorized agents, and federal agencies.

C. The recipient, and any subrecipient ("subgrantee") at any tier, must authorize the Office for Victims of Crime (OVC) and/or the Office of the Chief Financial Officer (OCFO), and its representatives, access to and the right to examine all records, books, paper, or documents related to the VOCA grant.

D. The Subgrantee (and any "subrecipient" at any tier) must have written procedures in place to respond in the event of an actual or imminent "breach" (OMB M-17-12) if it (or a subrecipient)-- 1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "personally identifiable information (PII)" (2 CFR 200.79) within the



scope of an OJP grant-funded program or activity, or 2) uses or operates a "Federal information system" (OMB Circular A-130). The recipient's breach procedures must include a requirement to report actual or imminent breach of PII to an OCVS and US DOJ OJP Program Manager no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.

E. Time and attendance/effort records must be kept, specifying personnel hours worked directly on Subgrant activities (including volunteers to the extent used as match) and the nature of the work performed.

F. The Subgrantee shall maintain, as part of the financial records of the Subgrant, the following types of property management records for all property acquired in whole or in part with Subgrant funds. At a minimum, property management records must meet the following requirements:

1. Records must contain copies of purchase orders and invoices.
2. The records must include an inventory control listing for nonexpendable personal property and the list must be kept current. The system may be manual or automated, centralized or decentralized; however, the records must contain:
  - a) Item description;
  - b) Source of property;
  - c) Manufacturer's serial number and, if applicable, a control number;
  - d) Cost equity at the time of acquisition;
  - e) Location, use and condition of property; and
  - f) Ultimate disposition data including sale price or the method used to determine current fair market value.
3. Physical inventory of nonexpendable personal property with a useful life of more than one year and an acquisition cost of \$5,000 or more per unit shall be taken by the Subrecipient and the result reconciled with the property record to verify the existence, current utilization and continued need for property. The results of the inventory will be reviewed by the Department during monitoring visits or upon request. These records shall become part of the official subgrant file.
4. A control system shall be in effect to ensure adequate safeguards to prevent loss, damage, or theft to nonexpendable personal property. Any loss, damage or theft of nonexpendable personal property shall be investigated, fully documented and made part of the office subgrant file.
5. Adequate maintenance procedures shall be established to keep the nonexpendable personal property in good condition.
6. Proper sales procedures which would provide for competition to the maximum extent practicable and result in the highest possible return shall be established for unneeded nonexpendable personal property.
7. Property/Equipment Reports - Any property or equipment purchased with Subgrant funds must be approved in advance by the Department. Reimbursement requests for such approved purchases must be accompanied by an inventory report submitted in Egrants detailing the information required under item 2a. - f. above.
8. Property/Equipment Disposal - Disposal of property or equipment purchased in whole or in part with Subgrant funds is subject to approval by the Department. The Department will determine how the property or equipment is disposed of upon termination of the subgrant. Disposal may include the Subgrantee's retention of the equipment, transfer to another project, return to the Department of Justice, sale, or any other disposal deemed appropriate by the Department.

## VIII. AUDIT RESPONSIBILITIES

A. Subgrantees that expend \$750,000 or more in Federal financial assistance in any fiscal year must have a single audit or program specific audit conducted for that year in conformance with the requirements of 2 CFR 200.501.

B. Subgrantees requiring an audit pursuant to 2 CFR 200.501 must submit a copy of the audit report, financial statements and accompanying management letters to Office of Crime Victim Services no later than nine months after the end of the agency's fiscal year.

C. The Subgrantee shall notify the Office of Crime Victim Services in writing whenever an audit is or will likely be required pursuant to 2 CFR 200.501.

D. The Office of Crime Victim Services retains the right to require an audit if it is deemed necessary to ensure compliance with state or federal laws, rules and regulations.

IX. ASSURANCES - By acceptance of this subgrant award, the Subgrantee assures that:

A. **Compliance.** The Subgrantee shall comply with all applicable provisions of the Victims of Crime Act (VOCA) and federal and state Program Guidelines.

B. **Non-supplantation.** Funds will not be used to supplant other sources of support.

C. **Direct services.** Funds will be used only to support direct services to crime victims.

D. **Eligible agency.** The applicant is a public agency, a non-profit organization or a combination of public agency and non-profit organization. If a non-profit organization, it is duly incorporated under Wisconsin Statutes or appropriate statutes of other recognized jurisdiction.

E. **Coordinated efforts.** The Subgrantee will promote, within the community served, coordinated public and private efforts to aid crime victims.

F. **Use of volunteers.** The Subgrantee shall, unless waived in writing by the Department, incorporate the use of volunteers in the delivery of victim services.

G. **Crime Victim Compensation assistance.** The Subgrantee will assist victims in seeking available crime victim compensation benefits.

H. **Federal victims.** The Subgrantee assures the availability of its resources to Federal crime victims.

I. **Victim Rights Compliance; victim treatment.** The Subgrantee agrees to take such action as may be necessary to ensure that all of its employees, volunteers, agents and other representatives, whether paid or unpaid, shall act consistent with the intent of state, federal and local laws and policies that crime victims be treated with dignity, fairness and respect and shall endeavor to ensure that all crime victims are informed and afforded the opportunity to exercise their rights under law.

J. **Notifications.** The Subgrantee shall promptly notify both the Department and the U.S. Department of Justice Office for Victims of Crime of any illegal acts or irregularities, and of proposed and actual actions, if any. Illegal acts and irregularities include such matters as conflicts of interest, falsification of records or reports, and misappropriation of funds or other assets.

K. **Non-discrimination.**

1. Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 42

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 42, specifically including any applicable requirements in Subpart E of 28 C.F.R. Part 42 that relate to an equal employment opportunity program.

2. Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 54

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 54, which relates to nondiscrimination on the basis of sex in certain "education programs."

3. Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 38

The nondiscrimination provision of the Victims of Crime Act of 1984 (34 U.S.C. § 20110(e)) prohibits the Subgrantee from discriminating in both employment and the delivery of services or benefits on the basis of race, color, national origin, religion, sex, and handicap in its programs or activities. Subgrantee will also comply (and

will require any subcontractor to comply) with any additional applicable federal nondiscrimination requirements, including Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d; Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794); Title IX of the Education Amendments of 1972 (20 U.S.C. § 1681); the Age Discrimination Act of 1975 (42 U.S.C. § 6102); 28 C.F.R. pt. 42 (U.S. Department of Justice Regulations – Nondiscrimination; Equal Employment Opportunity; Policies and Procedures); 28 C.F.R. pt. 54 (U.S. Department of Justice Regulations – Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance) 28 C.F.R. pt. 38 (Partnerships with Faith-Based and Other Neighborhood Organizations); Ex. Order 13279 (Equal Protection of the Laws for Faith-Based and Community Organizations); and Ex. Order 13559 (Fundamental Principles and Policymaking Criteria for Partnerships with Faith-Based and Other Neighborhood Organizations). In accordance with these laws, the Subgrantee will not retaliate against individuals for taking action or participating in action to secure rights protected by these laws.

In the event a federal or state court or federal or state administrative agency makes a finding of discrimination after a due process hearing on the grounds of race, color, national origin, religion, sex, or disability against a recipient of funds, the recipient will forward a copy of the finding to the U.S. Department of Justice, Office of Justice Programs, Office for Civil Rights, and the OCVS.

As clarified by Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI of the Civil Rights Act of 1964, a recipient must take reasonable steps to ensure that LEP persons have meaningful access to its programs. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. The recipient is encouraged to consider the need for language services for LEP persons served or encountered both in developing its budget and in conducting its programs and activities. Additional assistance and information regarding your LEP obligations can be found at [www.lep.gov](http://www.lep.gov).

**L. Civil rights information.** The project will maintain information on victim services by race, national origin, sex, age and handicap.

**M. Non-Disclosure of Confidential or Private Information.**

1. Confidentiality

SAAs and subrecipients of VOCA funds shall, to the extent permitted by law, reasonably protect the confidentiality and privacy of persons receiving services under this program and shall not disclose, reveal, or release, except pursuant to paragraphs (2) and (3) of this section

- a. Any personally identifying information or individual information collected in connection with VOCA funded services requested, utilized, or denied, regardless of whether such information has been encoded, encrypted, hashed, or otherwise protected; or
- b. Individual client information, without the informed, written, reasonably time-limited consent of the person about whom information is sought, except that consent for release may not be given by the abuser of a minor, incapacitated person, or the abuser of the other parent of the minor. If a minor or a person with a legally appointed guardian is permitted by law to receive services without a parent's (or the guardian's) consent, the minor or person with a guardian may consent to release of information without additional consent from the parent or guardian.

2. Release

If release of information described in paragraph (1)(b) of this section is compelled by statutory or court mandate, SAAs or sub-recipients of VOCA funds shall make reasonable attempts to provide notice to victims affected by the disclosure of the information, and take reasonable steps necessary to protect the privacy and safety of the persons affected by the release of the information.

3. Information sharing

SAAs and sub-recipients may share—

- a. Non-personally identifying data in the aggregate regarding services to their clients and non-personally identifying demographic information in order to comply with reporting, evaluation, or data collection requirements;
- b. Court-generated information and law-enforcement-generated information contained in secure governmental registries for protection order enforcement purposes; and
- c. Law enforcement- and prosecution-generated information necessary for law enforcement and prosecution purposes.

4. Personally identifying information

In no circumstances may—

- a. A crime victim be required to provide a consent to release personally identifying information as a condition of eligibility for VOCA-funded services;
  - b. Any personally identifying information be shared in order to comply with reporting, evaluation, or data-collection requirements of any program;
5. **Mandatory reporting**  
Nothing in this section prohibits compliance with legally mandated reporting of abuse or neglect.

**N. Debarment.** Neither the applicant nor any of its principals are presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from participation in this transaction by any Federal department or agency. (The attached Sub-Recipient Certification **MUST** be completed, signed and submitted along with the Subgrant Award Agreement.)

**O. Technology and information transfer.** The project will share technology and information with other service providers and will do so free of charge.

**P. Compliance with applicable rules regarding approval, planning, and reporting of conference, meetings, trainings, and other events.** The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable laws, regulations, policies, and official DOJ guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences (as that term is defined by DOJ), including the provision of food and/or beverages at such conferences, and costs of attendance at such conferences.

Information on the pertinent DOJ definition of conferences and the rules applicable to this award appears in the DOJ Grants Financial Guide (currently, as section 3.10 of "Postaward Requirements" in the "DOJ Grants Financial Guide").

**Q. OJP Training Guiding Principles.** Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at <https://ojp.gov/funding/Implement/TrainingPrinciplesForGrantees-Subgrantees.htm>.

**R. Responsiveness.** The project director will, at the option of the Department of Justice, appear before the Department to clarify findings and to answer any questions at any time during the project period or after the project is completed.

**S. Seat Belt Use Policy.** The Subgrantee shall adopt and enforce on-the-job seat belt policies and programs for employees (including paid staff, volunteers or contractors) when operating agency-owned, rented or personally owned vehicles.

**T. Performance Measures.**

1. The Subgrantee must collect, maintain, and provide to the Department and OJP, data that measure the performances and effectiveness of activities under this award, in the manner, and within the timeframes, specified in the program solicitation, or as otherwise specified by OJP. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act, and other applicable laws.
2. The Subgrantee agrees to submit performance reports on the performance metrics identified by OVC, and in the time and manner required by OVC. This information on the activities supported by the award funding will assist in assessing the effects that VOCA Victim Assistance funds have had on services to crime victims within the jurisdiction. Beginning October 1, 2015, the Subgrantee agrees to submit such information quarterly.

**U. Proof of Non-Profit Status.** The recipient must require all non-profit subrecipients of VOCA Assistance funding under this award to certify their non-profit status. Subrecipients may certify their non-profit status by submitting a statement to the recipient (to be placed in the grant file) affirmatively asserting that the subrecipient is a non-profit organization, and indicating that it has on file, and available upon audit, either -- 1) a copy of the subrecipient's 501(c)3 designation letter; 2) a letter from the subrecipient's state/territory taxing body or state/territory attorney general stating that the recipient is a non-profit organization operating within the state/territory; or 3) a copy of the subrecipient's state/territory certificate of incorporation that substantiates its non-profit status. Subrecipients that are local non-profit affiliates of state/territory or national non-profits should have available proof of (1), (2), or (3), and a statement by the state/territory or national parent organization that the subrecipient is a local non-profit affiliate.

**V. Waste, Fraud, Abuse, or Misconduct.** The Subgrantee must promptly refer to the Wisconsin Department of Justice

Office of Crime Victim Services (OCVS) and the US Department of Justice Office of Inspector General (OIG) any credible evidence that a principal, employee, agent, subrecipient, contractor, subcontractor, or other person has – (1) submitted a claim for award funds that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct involving award funds. Potential fraud, waste, abuse, or misconduct should be reported to the OIG by – mail: Office of the Inspector General; U.S. Department of Justice; Investigations Division; 1425 New York Avenue, N.W. Suite 7100; Washington, DC 20530 – email: [oig.hotline@usdoj.gov](mailto:oig.hotline@usdoj.gov) – hotline (contact information in English and Spanish): (800) 869-4499 or – hotline fax: (202) 616-9881. Additional information is available from the DOJ OIG website at [www.usdoj.gov/oig](http://www.usdoj.gov/oig).

**W. Restrictions and certifications regarding non-disclosure agreements and related matters.** No recipient or subrecipient under this award, or entity that receives a contract or subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.

The foregoing is not intended, and shall not be understood by the agency making this award, to contravene requirements applicable to Standard Form 312 (which relates to classified information), Form 4414 (which relates to sensitive compartmented information), or any other form issued by a federal department or agency governing the nondisclosure of classified information.

1. In accepting this award, the recipient –
  - a. represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and
  - b. certifies that, if it learns or is notified that it is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds, will provide prompt written notification to the agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.
2. If the recipient does or is authorized to make subawards or contracts under this award –
  - a. it represents that –
    - i. it has determined that no other entity that the recipient's application proposes may or will receive award funds (whether through a subaward, contract, or subcontract) either requires or has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as describe above; and
    - ii. it has made appropriate inquiry, or otherwise has an adequate factual basis to support this representation; and
  - b. it certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

**X. Recipient integrity and performance measures:** Requirement to report information on certain civil, criminal, and administrative proceedings to SAM and FAPIIS

The recipient must comply with any and all applicable requirements regarding reporting of information on civil, criminal, and administrative proceedings connected with (or connected to the performance of) either this OJP award or any other grant, cooperative agreement, or procurement contract from the federal government. Under certain circumstances, recipients of OJP awards are required to report information about such proceedings, through the federal System for Award Management (known as "SAM"), to the designated federal integrity and performance system (currently, "FAPIIS").

The details of recipient obligations regarding the required reporting (and updating) of information on certain civil, criminal, and administrative proceedings to the federal designated integrity and performance system (currently, "FAPIS") within SAM are posted on the OJP web site at <https://ojp.gov/funding/FAPIS.htm> (Award condition: Recipient Integrity and Performance Matters, including Recipient Reporting to FAPIS), and are incorporated by reference here.

#### CERTIFICATION

On behalf of the Applicant, and in support of this application for a grant or cooperative agreement, I certify under penalty of perjury to the U.S. Department of Justice ("Department"), that all of the following are true and correct:

1. I have the authority to make the following representations on behalf of myself and the Applicant. I understand that these representations will be relied upon as material in any Department decision to make an award to the Applicant based on its application.
2. I certify that the Applicant has the legal authority to apply for the federal assistance sought by the application, and that it has the institutional, managerial, and financial capability (including funds sufficient to pay any required non-federal share of project costs) to plan, manage, and complete the project described in the application properly.
3. I assure that, throughout the period of performance for the award (if any) made by the Department based on the application--
  - a. the Applicant will comply with all award requirements and all federal statutes and regulations applicable to the award;
  - b. the Applicant will require all subrecipients to comply with all applicable award requirements and all applicable federal statutes and regulations; and
  - c. the Applicant will maintain safeguards to address and prevent any organizational conflict of interest, and also to prohibit employees from using their positions in any manner that poses, or appears to pose, a personal or financial conflict of interest.
4. The Applicant understands that the federal statutes and regulations applicable to the award (if any) made by the Department based on the application specifically include statutes and regulations pertaining to civil rights and nondiscrimination, and, in addition--
  - a. the Applicant understands that the applicable statutes pertaining to civil rights will include section 601 of the Civil Rights Act of 1964 (42 U.S.C. § 2000d); section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794); section 901 of the Education Amendments of 1972 (20 U.S.C. § 1681); and section 303 of the Age Discrimination Act of 1975 (42 U.S.C. § 6102);
  - b. the Applicant understands that the applicable statutes pertaining to nondiscrimination may include section 809(c) of Title I of the Omnibus Crime Control and Safe Streets Act of 1968 (34 U.S.C. § 10228(c)); section 1407(e) of the Victims of Crime Act of 1984 (34 U.S.C. § 20110(e)); section 299A(b) of the Juvenile Justice and Delinquency Prevention Act of 2002 (34 U.S.C. § 11182(b)); and that the grant condition set out at section 40002(b)(13) of the Violence Against Women Act (34 U.S.C. § 12291(b)(13)), which will apply to all awards made by the Office on Violence Against Women, also may apply to an award made otherwise;
  - c. the Applicant understands that it must require any subrecipient to comply with all such applicable statutes (and associated regulations); and
  - d. on behalf of the Applicant, I make the specific assurances set out in 28 C.F.R. §§ 42.105 and 42.204.
5. The Applicant also understands that (in addition to any applicable program-specific regulations and to applicable federal regulations that pertain to civil rights and nondiscrimination) the federal regulations applicable to the award (if any) made by the Department based on the application may include, but are not limited to, 2 C.F.R. Part 2800 (the DOJ "Part 200 Uniform Requirements") and 28 C.F.R. Parts 22 (confidentiality - research and statistical information), 23 (criminal intelligence systems), 38 (regarding faith-based or religious organizations participating in federal financial assistance programs), and 46 (human subjects protection).
6. I assure that the Applicant will assist the Department as necessary (and will require subrecipients and contractors to assist as necessary) with the Department's compliance with section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108), the Archeological and Historical Preservation Act of 1974 (54 U.S.C. §§ 312501-312508), and the National Environmental Policy Act of 1969 (42 U.S.C. §§ 4321-4335), and 28 C.F.R. Parts 61 (NEPA) and 63 (floodplains and wetlands).
7. I assure that the Applicant will give the Department and the Government Accountability Office, through any authorized representative, access to, and opportunity to examine, all paper or electronic records related to the award (if any) made by the Department based on the application.
8. I assure that, if the Applicant is a governmental entity, with respect to the award (if any) made by the Department based on the application—

- a. it will comply with the requirements of the Uniform Relocation Assistance and Real Property Acquisitions Act of 1970 (42 U.S.C. §§ 4601-4655), which govern the treatment of persons displaced as a result of federal and federally-assisted programs; and
- b. it will comply with requirements of 5 U.S.C. §§ 1501-1508 and 7324-7328, which limit certain political activities of State or local government employees whose principal employment is in

**Lead Agency's Chief Executive:** I acknowledge that a materially false, fictitious, or fraudulent statement (or concealment or omission of a material fact) in this certification, or in the application that it supports, may be the subject of criminal prosecution (including under 18 U.S.C. §§ 1001 and/or 1621, and/or 34 U.S.C. §§ 10271-10273), and also may subject me and the Applicant to civil penalties and administrative remedies for false claims or otherwise (including under 31 U.S.C. §§ 3729-3730 and 3801-3812). I also acknowledge that the Department's awards, including certifications provided in connection with such awards, are subject to review by the Department and the US Department of Justice, including by its Office of the Inspector General. I certify that applicant will comply with the above-certified assurances.

\_\_\_\_\_  
**Signature of Authorized Representative** (Board Chair,  
 Co. Executive, Mayor)

\_\_\_\_\_  
 Joe Parisi, County Executive

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**Telephone Number**

U.S. DEPARTMENT OF JUSTICE  
OFFICE OF JUSTICE PROGRAMS  
OFFICE OF THE COMPTROLLER

**CERTIFICATIONS REGARDING LOBBYING; DEBARMENT, SUSPENSION AND OTHER  
RESPONSIBILITY MATTERS; AND DRUG-FREE WORKPLACE REQUIREMENTS**

Subgrantees should refer to the regulations cited below to determine the certification to which they are required to attest. Subgrantees should also review the instructions for certification included in the regulations before completing this form. Acceptance of this form provides for compliance with certification requirements under 28 CFR Part 69, "New Restrictions on Lobbying," 2 CFR Part 2867, "DOJ Implementation of OMB Guidance on Nonprocurement Debarment and Suspension," and 28 CFR Part 83, "Government-wide Debarment and Suspension," and Government-wide Requirements for Drug-Free Workplace (Grants)." The certifications shall be treated as a material representation of fact upon which reliance will be placed when the Department of Justice determines to award the covered transaction, grant, or cooperative agreement.

1. LOBBYING As required by Section 1352, Title 31 of the U.S. Code, and implemented at 28 CFR Part 69, for persons entering into a grant or cooperative agreement over \$100,000, as defined at 28 CFR Part 69, the Subgrantee certifies that:

(a) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any Federal grant, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal grant or cooperative agreement;

(b) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal grant or cooperative agreement, the undersigned shall complete and submit Standard Form - LLL, "Disclosure of Lobbying Activities," in accordance with its instructions;

(c) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subgrants, contracts under grants and cooperative agreements, and subcontracts) and that all sub-recipients shall certify and disclose accordingly.

2. DEBARMENT, SUSPENSION, AND OTHER RESPONSIBILITY MATTERS (DIRECT RECIPIENT)

Pursuant to Executive Order 12549, Debarment and Suspension, implemented at 2 CFR Part 2867, for prospective participants in primary covered transactions, as defined at 2 CFR Section 2867.20(a), and other requirements:

A. The Subgrantee certifies that it and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, sentenced to a denial of Federal benefits by a State or Federal court, or voluntarily excluded from covered transactions by any Federal department or agency;

(b) Have not within a three-year period preceding this application been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(c) Have not within a two-year period preceding this Subgrant Award Agreement been convicted of a felony criminal violation under any Federal law, unless such felony criminal conviction has been disclosed in writing to the Office of Justice Programs (OJP) at [ojpcompliance@usdoj.gov](mailto:ojpcompliance@usdoj.gov), and, after such disclosure, the Subgrantee has received a specific



written determination from OJP that neither suspension nor debarment of the Subgrantee is necessary to protect the interests of the Government in this case.

(d) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (b) of this certification; and

(e) Have not within a three-year period preceding this Subgrant Award Agreement had one or more public transactions (Federal, State, or local) terminated for cause or default.

B. Where the subgrantee is unable to certify to any of the statements in this certification, he or she shall attach an explanation to this Subgrant Award Agreement.

### 3. FEDERAL TAXES

A. If the subgrantee is a corporation, the Subgrantee certifies that either (1) the corporation has no unpaid Federal tax liability that has been assessed, for which all judicial and administrative remedies have been exhausted or have lapsed, that is not being paid in a timely manner pursuant to an agreement with the authority responsible for collecting the tax liability, or (2) the corporation has provided written notice of such an unpaid tax liability (or liabilities) to OJP at [ojpcompliancereporting@usdoj.gov](mailto:ojpcompliancereporting@usdoj.gov), and, after such disclosure, the Subgrantee has received a specific written determination from OJP that neither suspension nor debarment of the Subgrantee is necessary to protect the interests of the Government in this case.

B. Where the Subgrantee is unable to certify to any of the statements in this certification, he or she shall attach an explanation to this Subgrant Award Agreement.

### 4. DRUG-FREE WORKPLACE (GRANTEES OTHER THAN INDIVIDUALS)

As required by the Drug-Free Workplace Act of 1988, and implemented at 28 CFR Part 83, Subpart F, for subgrantees, as defined at 28 CFR Sections 83.620 and 83.650:

A. The Subgrantee certifies that it will or will continue to provide a drug-free workplace by:

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the subgrantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(b) Establishing an on-going drug-free awareness program to inform employees about

(1) The dangers of drug abuse in the workplace;

(2) The subgrantee's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

(c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will

- (1) Abide by the terms of the statement; and
- (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency, in writing, within 10 calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to: Department of Justice, Office of Justice Programs, ATTN: Control Desk, 810 Seventh Street, N.W., Washington, D.C. 20531. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted
  - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e), and (f).

As the duly authorized representative of the Subgrantee, I hereby certify that the Subgrantee will comply with the above certifications.

**DRUG-FREE WORKPLACE (GRANTEES WHO ARE INDIVIDUALS)**

As required by the Drug-Free Workplace Act of 1988, and implemented at 28 CFR Part 67, Subpart F, for sgrantees, as defined at 28 CFR Part 67; Sections 67.615 and 67.620

- A. As a condition of the grant, I certify that I will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant; and
- B. If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, I will report the conviction, in writing, within 10 calendar days of the conviction, to: Department of Justice, Office of Justice Programs, ATTN: Control Desk, 810 Seventh Street, N.W., Washington, D.C. 20531.

**CERTIFICATION**

**Lead Agency's Chief Executive:** I certify that Subgrantee will comply with the above-certified assurances.

\_\_\_\_\_  
**Signature of Authorized Representative** (Board Chair, Co. Executive, Mayor)

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
 Joe Parisi, County Executive

\_\_\_\_\_  
**Telephone Number**

OFFICE OF THE COMPTROLLER

**Certification Regarding  
Debarment, Suspension, Ineligibility and Voluntary Exclusion  
Lower Tier Covered Transactions  
(Sub-Recipient)**

This certification is required by the regulations implementing Executive Order 12549, Debarment and Suspension, 28 CFR Part 67, Section 67.510, Participants' responsibilities. The regulations were published as Part VII of the May 26, 1988 Federal Register (pages 19160-19211).

**(BEFORE COMPLETING CERTIFICATION, READ INSTRUCTIONS ON BACK)**

- (1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department of agency.
- (2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

**CERTIFICATION**

**Lead Agency's Chief Executive:** I certify that Subgrantee will comply with the above-certified assurances.

\_\_\_\_\_  
**Signature of Authorized Representative** (Board  
Chair, Co. Executive, Mayor)

\_\_\_\_\_  
Joe Parisi, County Executive

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**Telephone Number**

## Instructions for Certification

1. By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
3. The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
4. The terms "covered transaction," "debarred," "suspended," "ineligible," "lower tier covered transaction," "participant," "person," "primary covered transaction," "principal," "proposes," and "voluntarily excluded," as used in this clause, have the meanings set out in the Definitions and Coverage sections of rules implementing Executive Order 12549.
5. The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
6. The prospective lower tier participant further agrees by submitting this proposal that it will include the clause titled, "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion – Lower Tier Covered Transaction," without modification in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may check the Nonprocurement List.
8. Nothing contained in the foregoing shall be construed to require establishment of a system of reports in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
9. Except for transactions authorized under paragraph 5 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

# Wisconsin Department of Justice

## Subgrantee Civil Rights Information

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As a condition of the receipt of federal grant funding through the Wisconsin Department of Justice (WisDOJ), subgrantees must comply with civil rights laws and regulations that prohibit discrimination. The following sections provide information and links to websites that will be helpful to WisDOJ subgrantees in complying with these civil rights requirements. In addition, they provide information on certifications subgrantees must complete as a condition of receiving federal grant funding through WisDOJ.

### Civil Rights Training Opportunities

The US Department of Justice (US DOJ), Office of Justice Programs (OJP) has online training videos in the areas of Civil Rights, LEP and EEOP to help you understand your requirements as a subrecipient of these funds through a WisDOJ grant. You can find the training videos at <http://www.ojp.gov/about/ocr/assistance.htm>. If you do not find the information you are looking for please contact your WisDOJ program manager for assistance.

### Civil Rights Laws, Regulations and Publications

The federal Office for Civil Rights (OCR), Office of Justice Programs (OJP) website includes information that will assist subgrantees in complying with civil rights laws and regulations. The site includes information regarding Equal Employment Opportunity Plans, the prohibition against national origin discrimination affecting persons with limited English proficiency, and other civil rights law and regulations: <http://www.ojp.gov/about/offices/ocr.htm>

The OCR site provides links to specific civil rights laws and regulations that are applicable to WisDOJ subgrantees that receive federal OJP funding, including but not limited to Byrne JAG Formula Grant, Title II Formula Grants (Juvenile Justice) Juvenile Accountability Block Grants (JABG), Title V (Juvenile Justice), Project Safe Neighborhoods (PSN), Residential Substance Abuse Treatment (RSAT), Violence Against Women Act (VAWA), Victims of Crime Act (VOCA), and National Criminal History Improvement Program (NCHIP). These laws and regulations may be found at <http://www.ojp.gov/about/ocr/statutes.htm>.

### Limited English Proficiency (LEP)

Courts have interpreted Title VI's prohibition of discrimination on the basis of national origin to include discrimination based on English proficiency. Under Title VI (and the Safe Streets Act), recipients are required to provide LEP individuals with meaningful access to their programs and services. Providing "meaningful access" will generally involve some combination of services for oral interpretation and written translation of vital documents. LEP guidance and requirements for subgrantees of OJP Federal funds can be found at <http://www.ojp.gov/about/ocr/lep.htm>.

### UPDATED: Equal Employment Opportunity Plan (EEOP) and Required Certification Process

An Equal Employment Opportunity (EEO) plan is a comprehensive document that analyzes a subrecipient's relevant labor market data, as well as the subrecipient's employment practices, to identify possible barriers to the participation of women and minorities in all levels of a recipient's workforce. Its purpose is to ensure the opportunity for full and equal participation of men and women in the workplace, regardless of race, color, or national origin.

As a subrecipient of US DOJ funding, your organization may be required to submit a Certification Report or the Utilization Report portion of your plan to the Office for Civil Rights. If you are unsure of whether your organization is subject to the Civil Rights requirements of the Safe Streets Act, please refer to the EEOP FAQ [How can I tell if a recipient is subject to the Safe Streets Act?](#)

**The Equal Employment Opportunity (EEO) Reporting System will allow you to create your organization's account, then prepare and submit an EEO Certification Form and if required, create and submit an EEO Utilization Report. You will also be able to access your organization's saved information in subsequent logins.**

**EEO Reporting Tool Login: <https://ocr-eeop.ncjrs.gov>**

Not everyone is required to file an EEOP. The following subrecipients of WisDOJ may claim a complete exemption from the EEOP requirement:

- Recipient has fewer than 50 employees,
- Recipient is a non-profit organization,
- Recipient is a medical institution
- Recipient is an Indian Tribe
- Recipient is an educational institution, or
- Recipient is receiving an award less than \$25,000

**The OCR website includes information about when an EEO Plan is required and how to develop an EEOP: [http://www.ojp.gov/about/ocr/faq\\_eeop.htm#8](http://www.ojp.gov/about/ocr/faq_eeop.htm#8)**

## **Filing a Civil Rights Complaint**

The Office for Civil Rights (OCR) investigates complaints from individuals or groups who believe that they have experienced discrimination from an agency that receives funding from the US DOJ. These include the Office of Justice Programs and its components as well as the Office of Community Oriented Policing Services and the Office on Violence Against Women. OCR can also investigate agencies that receive US DOJ funding from state and local government agencies.

Federal laws prohibit discriminating against individuals or groups, either in employment or in the delivery of services or benefits, on the basis of race, color, national origin, religion, sex, age or disability.

If you believe that you have experienced discrimination, you are encouraged to file a civil rights complaint as soon as possible. In more circumstances, you have only one year from the date of the incident to do so. Complete the Complaint Verification Form and the Identity Release Statement, found at <https://ojp.gov/about/ocr/complaint.htm>, and submit to:

Office for Civil Rights  
Office of Justice Programs  
U.S. Department of Justice  
810 7th Street, NW  
Washington, DC 20531