MAPA POLICIES AND PROCEDURES
For MAPA VOCA CIRCUIT BASED VICTIM ADVOCATE PROGRAM
2018

(adopted 5-30-18; addendums approved 4-7-20 and 4-13-20;
amended 10-15-20/3-28-22/8-4-22; amended June 5, 2023; amended & approved 3-31-26;)

MISSION STATEMENT

As the voice of Missouri's prosecutors, MAPA strides to provide uniformity and efficiency in the discharge of duties and functions of Missouri's prosecutors; works with the development of legislation and policy that protects the public, improves Missouri's criminal justice system and enhances the profession of prosecution; and supports the enforcement of crime victims' Constitutional rights and the provision of direct services as well as timely and on-going support to victims of crime throughout the state.

Victims of Crime Act Funding

According to the VOCA Program Guidelines (per VOCA Grant Solicitation), services are defined as those efforts that:

- respond to the emotional and physical needs of crime victims;
- assist primary and secondary victims of crime to stabilize their lives after a victimization;
- help victims understand and participate in the criminal justice system; and
- provide victims of crime with a measure of safety and security.

For the purpose of providing the MAPA Circuit Based Victim Advocate Program, a crime victim is a person who has suffered physical, sexual, financial, or emotional harm as a result of the commission of a crime. Funding cannot be used for the investigation of crimes or collection of evidence to further the prosecution of crimes. By statute, funding priorities are given to programs serving victims of sexual assault, domestic violence and child abuse, and require MAPA and the MAPA VOCA Subrecipients to provide specific data for each of these categories with the monthly claims.

MAPA VOCA CIRCUIT BASED VICTIM ADVOCATE Subgrantee Award Process

Upon posting the availability of VOCA funds, state circuits or counties may submit a MAPA VOCA Subrecipient application to maintain an existing VOCA-funded position, enhance existing services, or request a new position; include the budget breakdown for their program with projected costs and accompanying estimates for items included in the budget; maintain the personnel procedures established for hiring and supervision of VOCA-funded employees; and

programmatic plan for direct service provision. MAPA will provide the format for the submission of this information.

The assigned salary for positions will be determined by the MAPA Subrecipient; all fringe benefits should be based on actual known costs or an established formula. Fringe benefits are for the personnel listed in the "Personnel" budget category and only for the percentage of time devoted to the project. Fringe benefits on overtime hours are limited to FICA, Worker's Compensation, and State Unemployment Compensation. Costs included in this category are: FICA (employer's portion of the Social Security and Medicare taxes), employer's portion of retirement, employer's portion of insurance (health, life, dental, etc.), employer's portion of Worker's Compensation and State Unemployment Compensation.

The MAPA VOCA Coordinating Committee will oversee all submissions and assure creation of MAPA Subrecipient Awards by contract document that delineates the specific funding for all categories requested.

I. Funding Procedures

The VOCA grant funds two positions to be housed in MOPS. These positions are dedicated to the provision of direct services of subrecipient programs and oversight of all programmatic and fiscal obligations of VOCA and provide funding directly to subrecipient sites in specified circuits of the state.

Any position opening for the two positions to be hired by MAPA are posted on the MAPA website in the section Job Openings. A description of the position and requirements are included in the notice and deadline for application. The selection process will include submission of resume and references, interviews and background checks prior to offering the position.

MAPA VOCA Subrecipients are expected to have established hiring and personnel policies which include notice of openings for Victim Advocate positions which may include a Job Announcement utilizing available websites (including MAPA's site at prosecutors.mo.gov if requested by the subrecipient) and other local options, as well as interviews, background and reference checks prior to offering the position. Salary and fringe benefits for the position will be determined by the MAPA Subrecipient circuit/hosting county in the circuit and be provided to MAPA for inclusion in the VOCA budget per the submitted funding request.

1. Host counties (individual or circuit) are required to designate a Fiscal Officer who will be responsible for providing all financial documentation to support the positions and expenditures submitted for monthly reimbursement.

2. Submission of all required invoice documentation by the 10th of the month.

3. Personal identifying information must be redacted from any and all reports (County financial/insurance documents, Karpel reports or information/referral log documentation) prior to submitting with the monthly claim for funding or as part of the quarterly report requirements.

4. Expenses previously covered by the County through General Revenue or other county funds may not be submitted for reimbursement through the MAPA VOCA program as this request will constitute supplanting which is not allowable for VOCA funds (per 28 CFR 94 108 [a] which states that subrecipients *may not use VOCA funding to supplant State administrative support for the State crime victim assistance program. Consistent with the DOJ Grants Financial Guide, such supplantation is the deliberate reduction of State/local funds because of the availability of VOCA funds."*

   To supplant means to "replace" or "take the place of." Federal law prohibits recipients of federal funds from replacing state, local, or agency funds with federal funds. Existing funds for a project and its activities may not be displaced by federal funds and reallocated for other organizational expenses.

   The MAPA VOCA Victim Advocate program adopts the DSS language for Non-supplanting: VOCA funds cannot be used to supplant, or take the place of, a Subrecipient agency's existing state or local (public) funding. VOCA funds must be used to supplement existing public funds and not substitute local or state public funds that have been appropriated or would otherwise be spent for the same purpose. Federal and/or state public funds cannot be utilized to cover existing costs that would otherwise be paid through other sources of funding.

5. Procurement policy: MAPA will comply with the federal guidelines for non-profit organizations (2 CFR 320) that is consistent with state and county laws and regulations for the acquisition of property and services required as a subrecipient of a VOCA award.

   The MAPA Board of Directors/VOCA Coordinating Committee created a procurement policy approved by the Board in July 2022 and is included as an addendum to this document.

Reimbursement Procedure

- The Circuit-Based Victim Advocates and Subrecipient Fiscal Officer are required to submit all grant paperwork to the MOPS VOCA Fiscal Officer via email. All MAPA VOCA Advocates will submit their monthly claim documentation via email by the 10th of each month or by specific date determined by the VOCA Fiscal Officer.
- If a VOCA Circuit-Based Victim Advocate fails to submit their documentation by the deadline, that will result in that specific county being unable to obtain their reimbursement until the next claim cycle.

- Grant documentation that advocates are required to submit includes, but is not limited to: VOCA activity timesheets, mileage logs, mileage checks (if already paid by the county), pay stubs, benefits verifications, and receipts for items eligible for reimbursement that complies with local procurement policies.
- The VOCA Circuit Based Victim Advocate will also submit the MAPA VOCA Invoice form with number of victims served and provide a breakdown of money spend on Child Abuse, Sexual Assault, Domestic Violence, and Underserved victims/cases.
- All data specific to cases and services provided will be collected through the Karpel database. No Personal Identifying Information is to be included on any reports submitted with the monthly claim.
- The information received from the Circuit-Based Victim Advocates will then be compiled by the MOPS VOCA Fiscal Officer into a billing spreadsheet reflecting the categories for reimbursement.
- The MOPS VOCA Fiscal Officer reviews all items prepared for reimbursement and completes the DSS VOCA Invoice form.
- Upon receipt of notice of reimbursement from DSS, the MOPS Fiscal Officer obtains authorization to prepare and mail reimbursement checks to the participating counties from the MAPA Deputy Director or the MAPA Executive Director. After all reimbursement checks are prepared, the MOPS Fiscal Officer will mail reimbursement checks to the participating counties.
- The MOPS Fiscal Officer will then invoice for the Statewide Victim Advocate Coordinator's and the VOCA Fiscal Officer's authorized time spent on the Circuit-Based Victim Advocate Project during that reimbursement cycle.
- Through this project, the Statewide Victim Advocate Coordinator and the VOCA Fiscal Officer will act as the liaison and the point of contact between the VOCA Circuit-Based Victim Advocate counties and DSS-VOCA Unit.

II. Contract Adjustments and Change of Information

- If unused awarded VOCA funds become available, MAPA will provide an opportunity for Subrecipient counties/circuits to submit the MAPA Contract Adjustment form with documentation that includes changes to the Subrecipient budget to include the additional funding to cover new project costs and statistical report that reflects increased need for services.
- The MAPA VOCA Coordinating Committee will review the request and determine approval of the use of existing funds for expanding Subrecipient services.
- As the DSS requires completion of their Change of Information form when the status of an employee changes or new employee is added, the following information will need to be provided to MAPA: person leaving position and last date of employment; new employee name, job title, hiring date, address, email, phone number, and brief description of work experience and job responsibilities for the position.

III. MAPA Subrecipient TRAVEL

All MAPA Subrecipients will be reimbursed for travel which has been included in their approved budget. Local mileage will be calculated at state government rate, documented and approved by the Circuit/County Fiscal Officer.

Travel for training will be included with documentation specific to the training attended. MAPA Subrecipients will comply with safe motor vehicle operation, use of seatbelts, and refrain from texting while driving during the course of all work activities provided during time identified and reimbursed by VOCA funds.

IV. MAPA Subrecipient Procurement

Each MAPA Subrecipient (circuit/county) will provide the procurement guidelines followed for the purchase of supplies and equipment. MAPA's guidelines include the following:

These procurement procedures are written to comply with the requirements of the Federal Uniform Guidance and apply only to procurements made with Federal funds.
Micro-purchases of $3,500 or less may be awarded by soliciting bids and should distribute purchases equitably among qualified suppliers. Considerations for selecting a vendor such as prices, quality and convenience should be documented. Every three years, MAPA should survey suppliers, consider new options, and document the selection.

Bids from at least three qualified sources must be obtained for small purchases between $3,500 and $150,000 through price or rate quotations. MAPA must use a bidding process but must not necessarily select the lowest bid. Considerations such as quality and reputation may be taken into account and must be documented. Every five to seven years, MAPA should send out new requests or proposal, consider new options, and document the selection.

Any large purchases or sole source contracts over $150,000 in value must conform to bidding requirements as set forth in the Federal Uniform Guidance.

- **VOCA Match Requirements**

In respect to the funds attributed to Match for the program, the primary contributions come from County general revenue payments for locally funded victim advocates (both 17 fully funded and 15 partially funded), that includes salary and County fringe benefits. All Match advocates are required to submit the same documentation as a MAPA VOCA funded advocate.

The other sources of matching funds for the MAPA VOCA Grant includes and is documented as follows:

- The MOPS Fiscal Officer will provide documentation of the Karpel fees collected for the MAPA VOCA Advocates and the advocates funded through general revenue or other

county source of income will be included as matching funds, as this database assures sound case management and statistical reporting.

- The contract County payment for Microsoft Exchange email addresses or Office 365 for MAPA VOCA Advocates is included as match with documentation provided by the MOPS Fiscal Officer.
- The Linn County satellite office expenses for their victim advocates (previously established and approved on their VOCA grant) is also included as match funding.

V. VOCA Contract Violations

MAPA Subrecipients will maintain Personnel Policies that include the requirements identified on the contract and in the Department of Social Services Standards.

The MAPA Subrecipient should promptly refer to the VOCA Fiscal Officer any credible evidence of civil or criminal violation of laws, including but not limited to the False Claims act, fraud, conflict of interest, bribery, gratuity or similar misconduct, as specified in 3.15.3 of the Contract.

Any issues of personnel or other misconduct must be addressed and reported to MAPA, along with the MAPA Subrecipient's intended course of action, and may result in specific stipulations for continued funding of MAPA Advocate positions. A failure to promptly report any such issues may result in discontinued funding.

VI. VOCA Grant Direct Services Provision by MAPA Subrecipients

All Counties participating in MAPA's Circuit Based Victim Advocate Program are required to provide direct services to victims in compliance with the Missouri Crime Victims' Rights Statute (RSMo. 595.200-320) and are strongly encouraged to adopt MAPA's Best Practices Recommendations relating to Victim Services. Failure to provide these direct services to victims can result in removal from the grant program.

All Counties participating must also abide by The Department of Social Services' Code of Ethics and Service Standards.

VOCA Circuit Based Victim Advocates should work to create collaborative relationships with community resources that serve their Circuit/County. Each Advocate is required to pursue these relationships and document them by either a Collaborative Agreement or Memorandum of Understanding.

VOCA Circuit Based Victim Advocates are also required to participate in the implementation of an evaluation tool that will assist with gathering information necessary to fulfill our grant objectives. Advocates will be asked to provide victim information, including victim name, telephone number, and crime information, to the Statewide Victim Advocate Coordinator

monthly. This information will be used to conduct telephone surveys to evaluate outcomes related to grant objectives.

Activities that are VOCA allowable include:

Criminal Justice Advocacy
Notification of Court Dates
Personal Advocacy
Crisis Counseling
Follow up contact
Information and Referral
Emergency Financial Support
Assistance Filling Crime Victims Compensation
Approved Training
Community Coordination of Direct Victim Services

Activities that are VOCA unallowable include:

Lobbying
Research and studies
Active investigation and prosecution of criminal cases
Fundraising
Capital expenses
Compensation for victims of crime
Medical Care

A. Grant Monitoring Procedures

Reporting Requirements
MAPA requires that grantees comply with and fully participate in the financial and programmatic reporting for this grant program. Statistics should be pulled by the mandatory case management program Prosecutor by Karpel on a monthly and annual basis. Monthly statistical information should be included with all financial documents submitted to the MOPS VOCA Fiscal Officer.

Quarterly Progress Reports*:* All VOCA Subrecipients will be required to submit reports on their program outputs supported by VOCA funding on a quarterly basis. VOCA Subrecipients must complete the VOCA Quarterly Report, which details the number of victims (new and existing) served by type of victimization, and number of services delivered by type of service. VOCA Subrecipients must collect data according to the categories of the Quarterly Report. This data should be collected using Prosecutor by Karpel. Victim Service Reports in Karpel can be used to verify all numbers being reported on the Victim Services Statistical Report (VSSR).

VSSR QUARTERLY PROGRESS REPORTS	
REPORTING PERIOD	***DUE ON OR BEFORE THE FOLLOWING DATES***
October 1 – December 31	***January 5***
January 1 – March 31	***April 5***
April 1 – June 30	***July 5***
July 1 – September 30	***October 5***

All statistical reports must be submitted electronically via email to MOPS VOCA Fiscal Officer. Failure to submit these output reports in a timely manner will significantly delay any Subgrant Expenditure Reimbursements submitted within the grant period and could lead to MOPS staff creating Corrective Action Plans. Continued delays will result in a staff recommendation to reduce funding or even possibly terminate participation in MAPA's Circuit Based Victim Advocate Program.

B. **Compliance Monitoring Activities and Other Requirements**

As part of its grant monitoring functions, MAPA is required to perform compliance monitoring activities of its subgrantees on at least a biennial basis. There are two types of compliance monitoring activities that MAPA conducts. Site visits give MAPA the opportunity to see all our subgrantees' important work up close, meet the program staff and tour the facility after reviewing all grant-related documents. Desk reviews occur when MOPS staff review all grant-related documents and conduct conference calls with the agency's personnel. Generally, MAPA determines if an agency is due for a site visit or a desk review based on either a risk assessment of subgrantee financial and programmatic viability, subgrantee requests for technical assistance, or if the MOPS Statewide Victim Advocate or MOPS VOCA Fiscal Officer notice compliance issues within the agencies.

MAPA will alert the VOCA Subrecipient about an upcoming site visit or desk review at least 2 weeks prior to the visit. The subgrantee's Elected Prosecutor, Victim Advocate/s, and Fiscal Officer will receive an announcement letter and document preparation checklists that they must complete prior to the visit.

In the event of a State-identified crisis or emergency, MAPA is permitted, as per Office of Justice Program directive, to utilize virtual monitoring through a secure remote meeting site such as: Zoom or GoTo Meeting platforms to perform compliance monitoring. MAPA will require subrecipients to submit required documents via email prior to the virtual monitoring session.

Below is a list of record-keeping requirements that will make the MAPA VOCA Subrecipient site visit a success and keep the Subrecipient in compliance with the VOCA grant:

- Karpel data must be maintained for all advocates who work or who have worked in the prosecuting attorney's office and have since left the office; this must be done by keeping the advocate Active in Karpel. No deletion of advocate is permitted as this action will also delete all pertinent data entered by the departing MAPA VOCA Advocate. Computer information pertaining to all advocates assigned to the MAPA VOCA grant (whether by termination or resignation) must be maintained pursuant to the requirements of the VOCA grant period.
- Maintain all records related to a subgrant for 3 years after the grant is closed. The clock for record-keeping for a particular grant starts the from the date of notification that the grant has been closed fiscally and programmatically.
- Keep all receipts related to any supplies or equipment purchases made with grant funds;
- Maintain an inventory list of all equipment and the grant funds used to pay for each;
- Ensure that timesheets are kept for all grant-funded personnel during the grant period; Timesheets should capture the number of hours worked, the grant to which the hours are assigned, and the activities performed on the grant.
- Ensure that the MAPA VOCA Subrecipient has policies and procedures that separate accounting duties within the organization;
- Ensure that an Equal Employment Opportunity Plan has been completed by the MAPA VOCA Subrecipient county, that has been filed this with the Office of Civil Rights (if applicable) or that a federal *Certification Form* has been filed. Refer to Section "A" of this form to determine if the Subrecipient county is exempt or go to the Office of Justice Program's Office of Civil Rights website.
- Keep copies of invoices for contractors listed on the grant and a copy of the contract between your agency and the contractor.
- Ensure an accounting system that is able to separate the expenses and revenue for the VOCA subgrant award from other general expenses and revenue or those associated with other grants;
- Ensure that the VOCA Subrecipient has non-discrimination policies for service provision and that these policies are made available to clients and employees (described below.)

MAPA will review all of these documents, the accounting system, the personnel policies and procedures and a random selection of receipts and other documentation during the site visit or desk review. Staff will also address any programmatic reporting or other issues with which your agency may need technical assistance.

As MAPA VOCA programs are required by DSS to retain all records pertaining to the services and accounting specific to MAPA VOCA Advocate positions, the removal or deletion of VOCA-required documentation is not permitted; if such removal or deletion of documentation occurs, this action may/will be considered a compliance violation of the MAPA VOCA contract with the county.

Failure to remain in compliance with grant requirements will result in a Corrective Action Plan (CAP). Corrective Action Plans will outline specific objectives that will need to be completed within 45-90 days of receiving the CAP. Failure to complete with the specified items on the CAP can result in holds placed on reimbursements as well as being denied participation in the MAPA VOCA Circuit Based Victim Advocate Program.

C. Language Access Services

MAPA is dedicated to assisting all victims of crime with information, referral and support as they navigate the criminal justice system. To serve victims who have English as a Second Language, MAPA requires that VOCA Circuit-Based Victim Advocates identify and utilize the interpreter and translator services in their area or seek assistance from the Statewide Victim Advocate to connect the Circuit-Based Victim Advocate to an appropriate resource. All efforts should be made to assure that victims are able to receive interpreter services that will be neutral and avoid having family members interpret during interviews. For court proceedings, interpreters are available through the Office of State Court Administrators. Telephone interpretation is available through various service providers.

D. Confidentiality

MAPA requires VOCA Circuit-Based Victim Advocates to promote the safety of crime victims and prevent re-victimization. As such, confidentiality of information shared by victims with their advocate is vital to maintaining a relationship where support and information are valued.

VOCA Circuit-Based Victim Advocates are employees of prosecuting attorneys and agents of the state, and the state must comply with all applicable statutes, caselaw and rules relating to the disclosure of exculpatory evidence, including written summaries of victim statements and exculpatory oral statements.

VOCA Circuit-Based Victim Advocates, all volunteers and interns are required to sign the DSS Code of Ethics Statement, a Confidentiality Statement, and utilize the pertinent consent forms prior to sharing of information specific to an individual victim. As per this agreement, advocates, volunteers and interns affirm by signature that information shared within the Victim Services Unit is to be held in strict confidence and not repeated in any part to anyone not affiliated with the Prosecuting Attorney's Office with the exception of those government agencies that are part of the criminal justice process (e.g. Department of Corrections, Probation and Parole, Department of Mental Health).

VII. MAPA Subrecipient Position Training

All VOCA Circuit Based Victim Advocates should receive 60 hours of training within 60 days of being hired. This training should include the Basics of Advocacy, Prosecutor by Karpel, Grant documentation and compliance, and Trauma Informed Care. All Circuit Based Victim Advocates

are required to complete at least 15 hours of continuing education training each year which should include specific hours on updates in Prosecutor by Karpel. All VOCA Circuit Based Victim Advocates are also required to become Safe at Home Application Assistants. Advocates must attend the initial Safe at home training as well as maintain their application assistant position for the duration of their employment.

VOCA Circuit Based Victim Advocates should request to attend trainings at least 30 days in advance whenever possible. VOCA Circuit Based Victim Advocates should provide the agenda or training description to the MOPS Statewide Victim Advocate Coordinator who will then get approval for the training. When Advocates attend approved trainings, they must submit the training agenda along with documentation of the pre-approval with their monthly financial documentation and timesheets.

VIII. Volunteer/Intern Training and Supervision

Volunteers and Student Interns who assist MAPA VOCA Subrecipients will be required to have attended the mandatory training on victims' rights, victim assistance and trauma-informed approaches through MAPA or through MAPA's collaborative partners. Volunteer tasks at subrecipient sites must be reviewed/approved by the Statewide Victim Advocate to assure compliance with VOCA criteria.

IX. MAPA Non-Discrimination Statement

MAPA Subrecipients and VOCA Circuit-Based Victim Advocates will not discriminate against any victim, employee, colleague, allied professional or member of the public on the basis of race, ethnicity, color, national origin, language, sex, gender, age, sexual orientation, social class, ability, economic status, education, marital status, religion, substance abuse, health status or HIV status.

X. Data Collection and Reporting

Victim information and service provision will be maintained in the Prosecutor by Karpel database. Service statistics for grant reporting will be obtained from the database and included on the MAPA VOCA Claim form for monthly invoicing as well as for quarterly and annual reporting. It is the responsibility of the MAPA VOCA Subrecipient to verify that these service statistics are accurate and complete. By submitting said service statistics to MAPA, the subrecipient is verifying the authenticity of said statistics.

XI. Evaluation of MAPA VOCA Project

The VOCA Grant objectives will vary with grant application process. The following are an example of the grant objectives which require data collection and documentation that victims served are aware of their rights, available assistance, and community resources:

_____% of survivors will understand their rights as crime victims.

_____% of clients going through the court process will understand their role in the court procedure.

Crime victim compensation forms will be accurately completed and filed for_____% of survivors seeking compensation.

_____% of collaborators will feel better able to provide accurate information to victims of [child abuse, domestic violence, sexual violence, etc.].

_____% of survivors will have access to accurate information about the legal system, in order to make informed decisions and choices.

_____% of clients will have access to accurate information about support services available in the community that they might need

_____% of volunteers will show an increase in knowledge regarding dynamics of victimization after training.

MAPA VOCA Subrecipients will utilize documentation that assures crime victim understanding and acknowledgement of the services provided; statistical data from PBK; and participation in the evaluation tool created by MAPA for feedback from victims (victim contact information will be utilized for outreach via telephone survey for evaluation purposes).

XII. Record Retention and Grant Close Out

MAPA maintains all financial documentation and grant reports (monthly, quarterly, and annually) through digital/electronic files. Access to all documentation is protected by individual access code of staff involved in the grant award and reimbursement process. The DSS Close Out form will be completed reflecting end of grant project requirements (final reimbursement, annual report submitted) and kept with all documentation retained for the project period.

All MAPA VOCA records will be stored for seven years as required for multi-year Federal grant awards.

As MAPA VOCA programs are provided with equipment purchases and DSS has clearly identified the required time for retention of all records pertaining to the services and accounting specific to MAPA VOCA Advocate positions, the removal or deletion of documentation is not permitted; and if such removal or deletion of documentation occurs, this action will be considered a violation of the MAPA VOCA contract with the county.

XIII. MAPA VOCA Extraordinary Leave Policy (addendum)

Where a MAPA VOCA funded advocate, because of extraordinary circumstances, requires further paid leave due to the impact of State-identified crisis or emergency (e.g. COVID-19), the County may grant such further paid leave as the County decides is warranted. Extraordinary Leave will not normally be granted where other leave types are available, e.g. under the expansion of Family Medical Leave Act (FMLA) through the Families First Coronavirus Response Act (FFCRA) which

provides directives if the individual is exposed to, being treated for, or caring for a family member due to COVID-19 will receive up to 80 hours of paid leave. Any other approval for paid leave must be otherwise determined by the County.

In accordance with State of Missouri Office of Administration guidelines, MAPA VOCA funded advocates may be permitted to do the following as long as the work is consistent with the responsibilities of the Prosecuting Attorney's Office:

- Expand work hours or allow flexible schedule for completion of tasks around family care responsibilities (for care of children not in school or loss of day care).
- Work from home using laptop for documentation of outreach contact with victims for support during court restricted activities (no trials/hearings) or building closure.

XIV. MAPA VOCA Whistleblower Policy

MAPA VOCA requires directors, officers, awardees, and advocates to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

This policy covers concerns regarding unethical and illegal conduct, such as fraud, financial management, suspected violation of law, or danger to health and safety.

All individuals covered under the MAPA VOCA contract are encouraged to share questions, concerns, and complaints with their supervisor. If an employee feels uncomfortable reporting to a supervisor, they should report to the MAPA Executive Director.

The MAPA organization will strive to keep the identity of the complaining individual as confidential as possible, consistent with the need to conduct an adequate investigation.

No director, officers, awardees, and advocates who in good faith report a violation shall suffer harassment, retaliation, or adverse employment consequence.

The MAPA Executive Director is responsible for investigating and resolving all reported complaints and will report findings to the Board and County Commission.

XV. MAPA VOCA Cybersecurity Policy

MAPA VOCA participants are expected to use technology responsibly and solely for job-related activities. Employees may not use county or work-related email or other electronic mediums to send, retrieve or store any communications or other electronic media of a discriminatory or hostile nature".

All MAPA VOCA participants must use a strong, unique password for every account and utilize the approved password manager".

Sensitive information, including credit card numbers and personal addresses, must never be transferred via unencrypted email or stored on personal devices.

All remote work must occur over a secure, private network. Public Wi-Fi is prohibited unless you use the approved VPN.

If you receive a suspicious email, do not click any links or download attachments. Report it immediately to your County I.T. department or MAPA/MOPS I.T. Director and delete the email after reporting.

All inventions, intellectual property, and data developed using MAPA VOCA equipment or time are the property of MAPA VOCA.

MAPA/VOCA prohibits entering donor PII (Personally Identifiable Information) or proprietary strategic documents into free, public AI tools.

Account access for MAPA VOCA Participants, shall suspend any access by staff, volunteers, or board members immediately upon departure. Volunteer/board accounts will be reviewed and suspended after 6 months of inactivity"

XVI. Veteran-Owned Business and Labor Surplus

MAPA VOCA is committed to providing maximum practicable opportunities to small businesses, veteran-owned small businesses (VOSB), service-disabled veteran-owned small businesses (SDVOSB), and businesses in labor surplus areas (LSAs) to participate in our procurement process. We encourage the inclusion of these firms on solicitation lists and the breaking down of large procurements to facilitate their participation.

Pursuant to federal requirements, successful bidders are encouraged to take affirmative steps to utilize small businesses, minority-owned firms, women's business enterprises, and veteran-owned businesses (including SDVOSB) as subcontractors whenever possible.

In compliance with 2 CFR 200.321, MAPA VOCA shall:

- (1) Ensure small businesses, VOSBs, and LSA firms are solicited whenever they are potential sources;
- (2) Utilize the SBA Veteran Small Business Certification (VetCert) database to identify qualified veteran vendors;
- (3) Divide total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by veteran and LSA firms.

A small business, as defined by the Small Business Administration (SBA), that is at least 51% owned and controlled by one or more eligible veterans, service-disabled veterans, or surviving spouses, and verified in the SBA VetCert database.

Items acquired through the Federal Surplus Property Program must be placed in use within 12 months of receipt and used for a period of 12 months thereafter. Items may not be sold, traded, or leased without prior written approval from the State Agency for Surplus Property (SASP).

XVII. Recovered Materials

MAPA VOCA is committed to environmental stewardship and waste reduction. In our operations, we prioritize the procurement of items containing the highest percentage of recovered materials (recycled content) that are technologically feasible, economically viable, and meet our performance requirements."

- **Paper Products:** "All copier paper, letterhead, and envelopes purchased will contain a minimum of 30% post-consumer fiber, adhering to EPA procurement guidelines".
- **Electronics/IT:** "When disposing of or purchasing electronics, [Nonprofit Name] will use certified refurbishes and prioritize purchasing refurbished equipment over new, provided it meets operational needs".
- **Office Supplies:** "Preference will be given to office supplies (binders, folders, signage) manufactured using recycled plastic or post-consumer materials"

Contractors working with [Nonprofit Name] are encouraged to make maximum use of products containing recovered materials that are EPA-designated items, provided such items are available at a reasonable price and meet performance standards.

We are committed to a circular economic approach by ensuring that our waste materials are diverted from landfills whenever possible, focusing on reusing and recycling materials, and reducing the use of single-use plastics in daily operations

MAPA VOCA Fiscal Procedures
MAPA VOCA Coordinating Committee approved 2019
Extraordinary Leave Amended language June 2020
Amended Match defined October 2020
Update 2025

MAPA VOCA Subrecipients are expected to have established hiring and personnel policies which include notice of openings for Victim Advocate positions which may include a Job Announcement utilizing available websites (including MAPA's site at prosecutors.mo.gov if requested by the subrecipient) and other local options, as well as interviews, background and reference checks prior to offering the position. Salary and fringe benefits for the position will be determined by the MAPA Subrecipient circuit/hosting county in the circuit and be provided to MAPA for inclusion in the VOCA budget per the submitted funding request.

1. Host counties (individual or circuit) are required to designate a Fiscal Officer who will be responsible for providing all financial documentation to support the positions and expenditures submitted for monthly reimbursement and preparation of financial information for grant Intent to Participate requests.

2. Submission of all required invoice documentation.

- **Reimbursement Procedure**

A. The MAPA VOCA Victim Advocates and Subrecipient Fiscal Officer are required to submit all grant paperwork to the MOPS VOCA Fiscal Officer via email. As of 2023, all counties are to submit requests for reimbursement to the MOPS VOCA Fiscal Officer by the 10th of each month. If extenuating circumstances exist, the Fiscal Officer may request extension of due date to the 15th of the month. *The MAPA VOCA Reimbursement form is to be submitted in the original excel format along with any scanned supporting documents and statistical reports.*

B. If a MAPA VOCA Victim Advocate fails to submit their documentation by the deadline, that will result in that specific county being unable to obtain their reimbursement until the next claim cycle.

C. Grant documentation that advocates are required to submit includes, but is not limited to: VOCA activity timesheets, mileage logs, mileage checks (if already paid by the county), pay stubs/direct deposit form, benefits verifications, and receipts for items eligible for reimbursement that complies with local procurement policies.

D. All equipment items (laptop, printer/scanner, monitors, DVD players) purchased by the subrecipient must be tagged/labeled indicating the Subrecipient County Grant Contract number and Project Year. An example of the label to be affixed should reflect:

Property of _____ County PA on _____(date)
Serial # _____
MAPA VOCA funded
Contract #MAPA_____

Property Items with a current per-unit fair market value of $5,000 or less may be retained, sold, or otherwise disposed of with no further obligation to the U.S. Department of Justice and/or DSS.

E. The MAPA VOCA Victim Advocate will also submit the MAPA VOCA Reimbursement Form with bottom section completed to include number of victims served and provide a breakdown of expenses attributed to Child Abuse, Sexual Assault, Domestic Violence, and Underserved victims/cases with data compiled from the Karpel Assignment Demographic and Service Statistics reports.

F. The information received from the MAPA VOCA Victim Advocates will then be compiled by the MOPS VOCA Fiscal Officer into a billing spreadsheet reflecting the categories for reimbursement.

G. The MOPS VOCA Fiscal Officer reviews all items prepared for reimbursement, verifies amounts are consistent with awarded amounts, and all supporting documents verifies benefits/travel/equipment requests, then completes the DSS VOCA Invoice form for monthly submission. This review assures that no supplanting issues occur.

H. Upon receipt of notice of deposit from DSS, the MOPS VOCA Fiscal Officer provides a copy of the MAPA VOCA Claim spreadsheet to the MOPS Fiscal Officer who then obtains authorization to prepare and mail reimbursement checks to the participating Host counties from the MAPA Deputy Director or the MAPA Executive Director. After all reimbursement checks are prepared and signed, the MOPS Fiscal Officer will mail reimbursement checks to the participating counties.

I. The MAPA VOCA Fiscal Officer prepares and emails a Payment Notice for the amount reimbursed by check from MAPA to the County/Circuit Fiscal Officer.

J. The MOPS Fiscal Officer will then invoice for the Statewide Victim Advocate Coordinator's and the VOCA Fiscal Officer's authorized time spent on the Circuit-Based Victim Advocate Project during that reimbursement cycle and any expenses incurred for the pay periods.

K. Through this project, the Statewide Victim Advocate Coordinator and the MAPA VOCA Fiscal Officer will act as the liaison and the point of contact between the MAPA VOCA Victim Advocate counties and DSS-VOCA Unit.

L. MAPA requires each county to appoint/designate a County/Circuit Fiscal Officer to serve as primary contact for financial compliance with the VOCA grant, specifically regarding all salary and fringe documentation required from the county. This may be an individual within the Prosecuting Attorney's Office, the County Treasurer or County Clerk.

The MAPA VOCA Victim Advocates should submit all timesheets and other billed item documentation to be signed by the County/Circuit Fiscal Officer, as well as the Karpel statistical documentation to be included, with the MAPA VOCA Reimbursement form that is to be submitted by the monthly due dates. Any discrepancies or documentation concerns are reviewed with the County/Circuit Fiscal Officer for clarification or additional documentation of expenses.
Specific responsibilities include:

- Fiscal Officers are required due to an audit which determined we needed a third layer of checks and balances to ensure correct submission of reimbursable items.
- Fiscal Officers should have basic knowledge about what is allowed for your specific County for reimbursement.
- Fiscal Officers should review all documents submitted by the MAPA VOCA Advocates monthly to ensure correct reimbursement requests.

- Fiscal Officers should be the person submitting the completed documents to MAPA VOCA Fiscal Officer for reimbursement.
- Fiscal Officers will be the only people to receive monthly payment notice with a breakdown of what is being paid from the MAPA VOCA Fiscal Officer when reimbursement checks are sent to the Counties.
- Fiscal Officers should have a way of tracking submissions vs reimbursements to ensure everything is reimbursed appropriately. This is essential so that we do not have months go by before mistakes or miscalculations are discovered.
- The MAPA VOCA Fiscal Officer will only be reaching out to Fiscal Officers if there is an issue with something that is being claimed or an issue with the amounts requested. Fiscal Officers need to be aware of or at least know who to ask within the County to gather the appropriate documentation.

- **VOCA Match Requirements**

In respect to the funds attributed to Match for the program, the primary contributions come from County general revenue payments for locally funded victim advocates (both fully funded and partially funded), that includes salary and County fringe benefits. All Match advocates are required to submit the same documentation as a MAPA VOCA funded advocate.

The other sources of matching funds for the MAPA VOCA Grant includes and is documented as follows:

- The MOPS Fiscal Officer will provide documentation of the Karpel fees collected for the MAPA VOCA Advocates and the advocates funded through general revenue or other county source of income will be included as matching funds, as this database assures sound case management and statistical reporting.
- The contract County payment for Microsoft Exchange email addresses or Office 365 for MAPA VOCA Advocates is included as match with documentation provided by the MOPS Fiscal Officer.
- The Linn County satellite office expenses for their victim advocates (previously established and approved on their VOCA grant) is also included as match funding.

- **Required Reporting**

The MAPA VOCA Fiscal Officer will provide all financial documentation required by MO Department of Social Services for monitoring/site visits (in-person or desktop) which may include all documents submitted by subrecipient counties.

MAPA will complete an annual financial audit of the organization's accounting and checking account.

VOCA Fiscal Officer Monthly Reimbursement Claim Invoice/Disbursement Process – 2025

All host counties must have current/signed MAPA VOCA Contract for identified grant period in place prior to submission of any claim for reimbursement. Advocates will be reimbursed for monthly/bi-monthly/bi-weekly pay periods as well as accrued leave time as approved by DSS. County financial documentation must be included with all requests for reimbursement.

1. Monthly claims received from host counties by due date or extended per pay date.
2. Set up Monthly Excel Claim forms by region (for any changes in personnel).
3. MAPA VOCA Reimbursement form - page 1 printed for each county to use as worksheet, and folders created for all advocate documentation to be saved for claim review and audit.
4. Review of all claim amounts requested by the county (host) and documents included to cover request: payroll and fringe documents, timesheets, receipts for supplies, mileage log for travel and payment to advocate, and two required Karpel reports (Assignment Demographics and Service Statistics). Email reminders are to be sent for any missing documentation. Any office equipment requests must be pre-approved and will only be covered if funds are available.
5. Timesheets/MAPA VOCA Time Tracking must be consistent with Karpel Service Statistics, and contact may be made with MAPA VOCA advocates to assure compliance with selection/reporting of service codes to reflect hours included on this form. (Additional Karpel training with advocates may be necessary.)
6. *Identify any changes in amounts based upon budget and ITP/continuing award amounts; determine appropriate percentage change based on actual expense obtained from payroll and fringe supporting documents. Award amounts do not change and percentages will need to be adjusted if advocates are hourly-rate or have received an increase in salary/FICA. Annual changes to medical contribution by the county may occur throughout the calendar/grant year, and the percentage will require adjustment when this occurs.*
7. Follow up phone calls or emails with advocates and fiscal officers to review or obtain necessary information.
8. Claim calculations for all pay periods submitted are verified through supporting documents, and Statistical data entered on worksheet. Any training attended by advocates as documented on timesheet is noted on worksheet.
9. Data entry of all financial expenses and statistical information onto Excel Master sheet.
10. Using the MAPA VOCA Claim Excel Master Sheet with total expense breakdown by Victim Category identified on the Stats sheet, prepare DSS Invoice, Data Form, and Expenditure Report. Any Budget Adjustments identified as needed to assure line item amounts are sufficient to cover expenses must be submitted prior to completing the DSS Expenditure Report. All DSS documents are then submitted to FSD Invoice Unit and VOCA Unit for review and approval.
11. Prepare payment notices.

12. Submit MAPA VOCA Claim Master Sheet to MOPS Fiscal Officer when deposit is received so that county checks will be prepared and mailed.
13. Send out payment notices to each county prosecuting attorney who will then provide check received to their respective County Clerk/Treasurer for deposit.

Close Out claims connected to fiscal year requirements or grant period completion, e.g. Extension Grant periods, advocates/fiscal officers are provided with additional instructions for split pay periods and assistance with creating daily rate of pay. All mileage must be submitted for the close out month even if reimbursement has not yet been completed or the county will not be reimbursed.

DSS VOCA Budget adjustments must be approved in advance of invoice preparation. Budget adjustments are required to move funds from one line item to another to cover needed funds and must be based on available funds.