

STATE COURT ADMINISTRATORS OFFICE FUNDED RESTORATIVE JUSTICE PROGRAMS COMPLIANCE GUIDELINES INSTRUCTIONS AND RESOURCE GUIDE



Introduction:

Proper stewardship of state resources is an essential responsibility of the State Court Administrator's Office (SCAO). Grant recipients and service providers, contractors and any other entities receiving funds from SCAO must ensure that these resources are used efficiently and effectively to achieve desired objectives supporting restorative justice in Colorado.

HB13-1254 established a surcharge that created the Restorative Justice Cash Fund. Pursuant to section 18-25-101 (3) (b), CRS the Judicial Department has established these guidelines for recipients of funds from the Restorative Justice Cash Fund.

The purpose of this document is to provide SCAO funded restorative justice programs with a preview of the guidelines and expectations for record keeping, reporting and general programmatic and administrative activities. This document will be used for monitoring and during site visits to guide document reviews and support program success and state fund management for FY 2016 (July 1, 2015-June 30, 2016). It was created from the lessons learned throughout the RJ Pilot Project period.

Resource Information: This guide provides important information for each compliance item and will help guide the grant funded agency in ensuring the grant cycle goes smoothly and the agency is in compliance with SCAO and the Restorative Justice (RJ) Council requirements. The intent is to provide you additional information in order to increase your knowledge and understanding of the specific compliance requirements. Although this may not be comprehensive and completely cover all details of reporting, record keeping and program participation with the grant. RJ Council staff hopes you find this information to be helpful. We welcome any comments or suggestions you may have.

Definitions:

Grant funded agency, recipient, organization or entity: is the agency, recipient, organization or entity receiving State RJ Program grant dollars directly from the State Court Administrator's Office (SCAO) at Judicial. This includes "pass-through agencies, recipients, organizations or entities". Because SCAO contracts directly with the "grant funded" agency, recipient, organization or entity, the agency, recipient, organization or entity is bound to all the grant terms and conditions and state and specific grant requirements. The grant funded agency, recipient, organization or entity includes, but is not limited to cities, counties, district attorney's offices, police departments, non-profits, for profits, governmental and non-governmental organizations. Any sub-grantees, contractors or other recipients of these dollars as a result of the RJ Program are accountable to the agreements through the grant funded agency.

Program Director: is the person in the grant funded agency, recipient, organization or entity who is most knowledgeable about the grant activities and is the responsible party to SCAO, RJ Council and DCJ as the data collection agency.

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Financial Officer: is the person in the grant funded agency, recipient, organization or entity who is responsible for accounting and bookkeeping relative to the SCAO grant funds. The Financial Officer may be the person responsible for reconciliation of SCAO RJ grant expenditures and revenues as well as reporting and tracking.

Program participants: are those who receive the services from the program being funded by the grant. Every grant funded program should have program participants. This is true even if the grant funded entity has sub-contracted out the work and the grant funded entity is not involved in the direct delivery of services.

Master Grant File: contains all documentation relative to the grant funded program. All documentation should include the grant name and number. Records contained in this file should be retained for a minimum of three (3) years.

Important Instructions, Information & Helpful Hints:

FY '16 PAYMENT METHOD. Grant funded agency, recipient, organization or entity shall submit itemized invoices for reimbursement on the form provided by SCAO reflecting actual expenses within twenty (20) days after the end of each quarter for which payment is requested or expenditures have been made. Due dates for financial reports and reimbursement requests: 20 days after the end of the calendar quarter (10/20, 1/20, 4/20 and 7/20) Payments will be made within 30 days after receipt and approval of invoices.

Use of Funds: All SCAO/ RJ Council granted funds shall be used for the approved RJ Program in the approved categories found in the Interagency Agreement (personnel, supplies and operating, travel, equipment and consulting) between the grant funded agency, recipient, organization or entity and the Judicial Department. No indirect or unspecified expenses or expenses outside of the approved categories will be allowed.

Communication: After reviewing this document if you have any questions or are in need of additional assistance, please contact the Restorative Justice (RJ) Coordinator at SCAO. (Deb Witzel 720-625-5964 or deb.witzel@judicial.state.co.us) The RJ Coordinator at SCAO is there to help you throughout the grant cycle and is prepared to answer any questions you may have.

When you want to make CHANGES: Verbal approval is not sufficient for changes to the grant goals, budget or staffing. All of these and other significant changes must be communicated in writing. Changes may be discussed with the SCAO RJ Coordinator in advance to determine if written approval is required. Budget revisions required approval from SCAO.

Modification of Grant Agreements – Interagency Agreement Amendments

- Program Director and District Attorney signatures are required on written communication
 - To add, modify, or delete goals of the project

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- A narrative explaining and justifying the requested change is required
- Contract Amendment – changes in goals, Program Director, DA or other signing authority
- Grant Funding Change Letter – required to increase or decrease funding

Program Director: It is important that the compliance guidelines be reviewed and monitored by the Program Director listed on the original grant application. If this person changes written updates must be submitted to SCAO RJ Coordinator as soon as possible once the change occurs. The Program Director is the person who is most knowledgeable about the grant and is the responsible party to SCAO. The Program Director will be contacted about a formal site visit via a phone call or email from the state RJ Coordinator. It is the Program Director's responsibility to ensure compliance of the grant funded agency.

Responsibilities:

- Program Director must be aware at all times about what is happening with the grant funded program.
- Program Director must know what the grant application includes; what the grant pays for and what your agency agreed to do.
- Program Director is the “go to” person. It is fine to use administrative staff to help with details, however, the Program Director must have complete oversight of the program.
- Completion and submission of all Reporting Forms: quarterly data reports, quarterly financial reports, reimbursement requests, and any grant modifications.
- Coordinate with the funded program's Financial Officer on a regular basis and keep them in the communication loop with regards to grant activities.
- Program Director must thoroughly review invoices, receipts, payroll records, mileage vouchers, travel receipts, time sheets, etc. and all other expenses related to the grant.
- All expense back-up documents should be marked with the uniquely assigned grant name and number and then signed off by the Program Director with your ORIGINAL signature and date.
- Program Director should be able to answer these questions: What are the goals of the program? Are grant goals being met? Are there issues with goals?
- Responsible for monitoring and managing any contracted services. Pay close attention to time sheets and invoices they should have detailed information about the number of hours worked and what was performed.
- Program Director must thoroughly review invoices, receipts, payroll records, mileage vouchers, time sheets, etc. and all other expenses related to the grant before paying.

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- Ensure that all internal controls are in place and are operating.
- Monitor budget for proper expenditures.
- Stay in regular communication with the RJ Coordinator; it is better to “ask a question”, than to GUESS!
- Be responsive to the RJ Coordinator as the best resource!

Master Grant File: The master grant file should contain ALL documentation relative to the grant funded RJ program. All documentation should include the grant name and number.

Grant File should contain at a minimum:

- Grant Interagency Agreement /Contract
 - Includes signed grant documents, including application and exhibits
- All correspondence related to grant
- Copies of or original receipts/invoices to support approved expenditures in the approved budget categories (personnel, supplies, operating, travel, equipment, etc) of the original grant application; payroll records ; mileage vouchers
- Copies of all reports
- Signed copy of contracts/purchase orders with outside vendors/consultants
- Time records from any contractor(s) being paid with grant dollars
- Internal agency timesheets and time records
- Any released reports and/or other publications, notices, visual or audio publications (books, films, manuals, etc.
- Any other items/documentation related to the grant award
- Signed (Memorandum of Understanding) MOU’s with outside entities if applicable

Professional Services/Consultant

- Grantee must comply with all appropriate local and state procurement procedures.

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- Required back-up documentation (i.e. scope of work, memorandum of understanding, draft contract) must be submitted by mail, or email to the RJ Coordinator for grant records AND must be retained in the master grant file.
- All expenses must be supported by a valid, signed contract between the grantee and the contractor, and by detailed invoices from the contractor, which have been approved for payment by the Project Director.
- The maximum hourly rate cannot exceed \$81.25 or \$650 per 8 hour day without prior approval.
- Justification must be included if the hourly wage exceeded \$81.25 per hour or \$650 per 8 hour day
- The grantee must provide justification if it is a sole source contract
- The contract must be signed by an authorized official of the grantee agency and the contract agency who has authority to enter into contracts
 - Note: Payment requests will not be approved if form(s) have not been received and approved.
- The debarment/excluded parties list needs to be checked at <https://www.sam.gov>

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COMPLIANCE GUIDELINES AND REQUIREMENTS

Section I. Administrative General Compliance

Human Resources Office/Employee Relations Office: The RJ Council and SCAO recommend that you seek the involvement of your Human Resources professional for items that impact personnel management. Reporting will require a breakdown of personnel expenses including but not limited to hourly/salary rate and benefits provided, time spent on the RJ program, duties or job descriptions relative to the program, personnel policies. Copies of all required policies and documents must be retained in the master grant file.

1. **Personnel Policy Manual** - Please retain a copy of your policy manual and/or other policies not in your personnel manual in your grant file. These will be reviewed at the site visit. Highlight/reference the page numbers where the policies listed below in questions 1.A. – 1.C. can be found. RJ Council/SCAO recommends that employees sign a statement that they have received the policies and procedures and that they understand the content.
 - A. **Non-discrimination policy** – Title VI of the *Civil Rights Act of 1964*, Title IX of the *Education Amendments of 1972*, *Section 504 of the Rehabilitation Act of 1973*, Title II of the *Americans with Disabilities Act*, and *Age Discrimination Act of 1975*, prohibit discrimination on the basis of race, color, sex, disability, age and national origin. These regulations require that recipients notify employees, program participants, benefit recipients and others that they do not discriminate on the basis of race, color, national origin, sex, disability, and age. An anti-discrimination policy conveys to employees, benefit recipients, program participants and others that discrimination on the basis of race, gender, color or national origin will not be tolerated and can provide a defense to a recipient/employer if a discrimination lawsuit should arise. Communicate the anti-discrimination policy to all employees. Have employees sign the policy to indicate that they have read it, understand it and agree to comply with it. Post the policy in the workplace and include it in the employee handbook or personnel manual.

Please review the following websites for more information and for resources:

<http://www.eeoc.gov/policy/index.html>
<http://www.eeoc.gov/facts/qanda.html>
<http://www.dol.gov/odep/pubs/fact/laws.htm>
<http://www.ojp.usdoj.gov/about/ocr/statutes.htm>
<http://www.dora.state.co.us/civil-rights/>

- B. **Written grievance policy** – Title VI of the *Civil Rights Act of 1964*, and other related civil rights statutes, require written grievance policies. The purpose of which is to provide and communicate to potential interested parties the primary process for addressing allegations of illegal discrimination. Potential interested parties include employees, benefit recipients, program participants and others. RJ Council/SCAO recommends that the policy describe in detail the procedure for dealing with complaints. And, that it provide for the prompt and thorough investigation of all complaints. It is important to also include the corrective actions that will be taken if any kind of discrimination is

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found to have occurred. Please include sufficient information for whom to contact including name(s), telephone number(s), email and web addresses.

- C. **Conflict of interest policy** –Grant recipients need to maintain written standards of conduct governing the performance of its employees engaged in the award and administration of contracts. No employee, officer, or agent shall participate in the selection, award, or administration of a contract supported by government funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award. The officers, employees, and agents of the recipient shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub-agreements. However, recipients may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the recipient.

The State of Colorado, in CRS 24-18-201 and 24-50-507, addresses conflict of interest policy requirements.

Please review the following websites for more information and for resources:

<http://ecfr.gpoaccess.gov/cgi/t/text/text->

[idx?c=ecfr&sid=565463259364a52fcf78f01be4fc9fcc&rgn=div8&view=text&node=28:2.0.1.1.25.3.14.20&idno=28](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=565463259364a52fcf78f01be4fc9fcc&rgn=div8&view=text&node=28:2.0.1.1.25.3.14.20&idno=28)

2. **Written policies or procedures notifying program participants of non-discrimination practices** – No one should be turned away from the opportunity to participate in restorative justice practices for financial reasons or for any reason noted in 1.A of this document.
3. **Written policies or procedures for notifying program participants and beneficiaries how to file complaints alleging discrimination** – please see numbers 1.B above for more information.
4. **Findings of discrimination** - 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, religion, national origin, sex, disability, or age against a recipient of funds, the recipient is to forward a copy of the finding to the State Court Administrator Office RJ staff.
5. **Debarred and suspended organizations** - The government-wide common rule for debarment and suspension, 28 CFR Part 67, provides guidance on requirements for recipients and sub-recipients that receive government funds. Recipients and sub-recipients are not permitted to award or permit any award at any level to any party which is debarred or suspended from participation in federal assistance programs.

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Please review the following websites for more information and for resources:

<http://www.gpo.gov/fdsys/pkg/CFR-2006-title28-vol2/pdf/CFR-2006-title28-vol2-part67.pdf>

<https://www.epls.gov/>

6. **Civil or criminal judgment or conviction** - The government-wide common rule, 28 CFR Part 67, stipulates that recipients and sub-recipients are not permitted to award or permit any award, at any level, to any party that has been convicted of civil or criminal offenses such as fraud, embezzlement, theft or other offenses, as stated in the General Compliance Check List, in violation of federal or state laws. Included are those who are presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local) with commission of any criminal or civil offenses. And, those, within a three-year period preceding, having one or more public transactions (federal, state, or local) terminated for cause or default.

Report any allegations of fraud, waste, and abuse of grant funds to the RJ Coordinator for the State Court Administrator.

7. **Civil or criminal indictments** – Same as 8. above
8. **Termination for cause or default** – Same as 8. Above
9. **Lobbying Activities** – The government-wide Common Rule, 28 CFR 69, requires all recipients and sub-recipients of funding to comply with its provisions for restrictions on lobbying. No SCAO funds may be used for purposes of:
 - A. Attempting to influence the outcome of any federal, state, or local election, referendum, initiative, or similar procedure, through in-kind or cash contributions, endorsements, publicity, or similar activity;
 - B. Establishing, administering, contributing to, or paying for the expenses of a political party, campaign, political action committee, or other organization established for the purpose of influencing the outcome of elections;
 - C. Attempting to influence: (a) the introduction of federal or state legislation; or (b) the enactment or modification of any pending federal or state legislation through communication with any member or employee of the Congress or State legislature (including efforts to influence state or local officials to engage in similar lobbying activity), or with any government official or employee in connection with a decision to sign or veto enrolled legislation;
 - D. Publicity or propaganda purposes designed to support or defeat legislation pending before legislative bodies;
 - E. Paying, directly or indirectly, for any personal service, advertisement, telegram, telephone, letter, printed or written matter, or other device, intended or designed to influence in any manner a member of Congress or of a state legislature, to favor or oppose, by vote or otherwise, any legislation or appropriation by either Congress or a state legislature, whether before or after the introduction of any bill or resolution proposing such legislation or appropriation;
 - F. Engaging in legislative liaison activities, including attendance at legislative sessions or committee hearings, gathering information regarding legislation, and analyzing the effect of

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- legislation, when such activities are carried out in support of or in knowing preparation for an effort to engage in unallowable lobbying; or
- G. Paying a publicity expert.

Please review the following websites for more information and for resources:

<http://www.gpo.gov/fdsys/pkg/CFR-2010-title28-vol2/pdf/CFR-2010-title28-vol2-part69.pdf>

10. **Records Retention Policy** - Record retention requirements are currently under review by the legal department at SCAO. The Interagency Agreement will reflect the record keeping obligation for the grant year.

A. The Grant funded agency assures that:

- i. It will retain all program records, and will facilitate an effective audit, for three years (3) after the end of the state fiscal year that includes the end date of the grant. (For example, if the grant ended 6/30/2015, the state FY would be July 1, 2014 – June 30, 2015. The files could be destroyed after 6/30/2018); except,
- ii. If an audit is in progress and/or the findings of a completed audit have not been resolved satisfactorily, then records must be retained beyond the three-year period until such issues are resolved.

Please review the following websites for more information and for resources:

www.colorado.gov/dpa/doit/archives

<http://www.colorado.gov/dpa/doit/archives/rm/MunicipalRMM/Table.htm>

11. **LEP Policy** – Limited English Proficiency (LEP) Title VI of the Civil Rights Act prohibits discrimination on the basis of national origin. Recipients of federal funds are required to take reasonable steps to provide meaningful access to their programs and activities to persons who have limited English proficiency. A plan for access to services includes an analysis of how you identified persons needing assistance, the importance of the type of services you provide to their lives, the likelihood that persons with LEP will encounter your programs, type and cost of resources available for assistance with LEP in your area. For example, steps may include a description of identified people with LEP in your area, how they are notified of the availability of your services, types of assistance that will be provided, and how staff will be trained.

Developing a written plan or policy is highly encouraged, but is not in itself a requirement. If you have one, please provide a copy of the written plan or policy. Otherwise, please document the steps your entity is taking to prepare a plan.

Please review the following website for more information and for additional resources:

<http://www.lep.gov/>

<http://www.ojp.usdoj.gov/about/ocr/lep.htm>

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12. **Federal E-Verify requirements** – Public Law 104-208 and 108-156, requires companies to employ only individuals who may legally work in the United States – either U.S. citizens, or foreign citizens who have the necessary authorization. Colorado legislation, CRS 8-17.50101 and 102, incorporates the federal requirements into state law. It is important to note that inter-governmental agreements between state agencies, local governmental entities such as cities, counties, towns, school districts, political sub-divisions, higher education, etc. are exempt from E-Verify requirements. Non-governmental entities meet the requirements by either using the federal E-verify program or by participating in the Colorado Department of Labor and Employment (CDLE), Division of Labor Program.

E-Verify is an Internet-based system that allows entities to determine the eligibility of their employees to work in the United States. A second option is to enroll in CDLE’s program in lieu of E-Verify and complete the “Notice of Participation in the Department Program for Public Contracts for Services” (“Notice Form”) located at either of these websites:

- A. Division of Labor: www.colorado.gov/cdle/pcs or;
- B. State Controller’s Office:
http://www.colorado.gov/dpa/dfp/sco/contracts/Unauthorized_Immigrants.htm

If your entity participates in the E-Verify program, please retain a copy of the Memorandum of Understanding (MOU) your entity signed with the federal government in your grant file. Or, if your entity participates in CDLE’s program, please retain a copy of your Notice of Participation Form that your entity completed and sent to CDLE to register for the program in your grant file.

Please review the following website for more information and for additional resources:

<http://www.colorado.gov/cs/Satellite?c=Page&childpagename=CDLE-LaborLaws%2FCDLELayout&cid=1248095356380&pagename=CDLEWrapper>
<http://www.uscis.gov/USCIS/Resources/E4en.pdf>
<http://www.uscis.gov/portal/site/uscis/menuitem.eb1d4c2a3e5b9ac89243c6a7543f6d1a/?vgnextoid=75bce2e261405110VgnVCM1000004718190aRCRD&vgnnextchannel=75bce2e261405110VgnVCM1000004718190aRCRD>

13. Children’s Code of Records and Information Act (C.R.S. 19-11-301 et seq.) Sharing information with respect to juvenile dependency or neglect under Title 19 for the acquisition, provision, oversight, or referral of services and support with the Judicial Department or any other agency or individual that performs duties and functions under the Colorado Children’s Code with respect to such cases.

Section II. Financial Compliance

1. **Financial Systems:** must reflect the expenditures and revenues of the grant funded RJ program separately from all other funds within the grant funded agency, recipient, organization or entity.

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2. **Policies for controls and separation of duties:** must reflect internal controls including a separation of duties, monthly financial reconciliations, dual signatures for expenditures above an express amount \$10,000 or less
3. **Grant Management:** The Program Director will be held accountable to the overall grant management. The Financial Officer and Program Director shall work together to ensure the grant funded are handle responsibly and reported in a timely fashion.
4. **Budget:** It is understood that budgets reflect the plan relative to the goals of the RJ program. The budget must adhere to the allowable categories and may only be amended by written request and approval from SCAO. The SCAO funds may not in any way be co-mingled with any other fund sources in reference to these reports, record keeping or administration. RJ Council understands that additional funds may be used for other restorative justice practices or services within an agency, organization or entity. However, the SCAO funds must be clearly and separately tracked.
 - a. Budget Revision - General Approval
 - i. A letter from the Project Director signed as well by the Financial Manager must be submitted to the RJ Coordinator requesting the Budget Revision or any structural, staff or significant programmatic changes. It must explain the need for the change, the amount of the budget change and an explanation of how the change will affect the RJ Program and participants. It must include a copy of the proposed budget with new lines addressing the budget revision.
 - ii. NOTE: VERBAL APPROVAL IS NOT SUFFICIENT
 - iii. NOTE: Changes within a Budget Category, (e.g., items within the supplies and operating category), do not necessarily require a written modification if they are under \$1000 but the Program Director must note the changes in the master grant file and provide explanation in the Year-end Report.
 - iv. NOTE: NO INDIRECT OR UNSPECIFIED EXPENDITURES WILL BE REIMBURSED.
5. **Expenditures:** Grant funded agency, recipient, organization or entity shall submit itemized invoices, including but not limited to the hourly rate or monthly salary of personnel paid by the grant, reflecting expenditures in the approved categories for reimbursement on the form provided by SCAO. Actual expenses, not budgeted expenses must be reflected on the reimbursement request. The Financial Report and Reimbursement Request must be submitted together within twenty (20) days after the end of each quarter for which payment is requested or expenditures have been made. Due dates for Financial Reports and Reimbursement Requests: 20 days after the end of the calendar quarter (10/20, 1/20, 4/20 and 7/20) Payments will be made within 30 days after receipt and approval of invoices.
6. **Reimbursement and record keeping:** Supporting documentation (receipts, invoices, etc.) for each Reimbursement Request should be kept in the master grant file attached to the Reimbursement Request for the quarter it was requested. Upon request copies of bank statements and/or credit card statements must be available for review by SCAO reflecting the expenditures spent and reimbursements deposited.

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7. Financial Reporting:

- a. Financial reports must be submitted in a timely fashion on or before the 20th working day of the month immediately following the end of the quarter (10/20, 1/20, 4/20 and 7/20). They should reflect the actual expenditures and any narrative or explanations relative to expenditures.
- b. The Year-end Financial report provides the final financial picture of the RJ Program at the end of the fiscal year and includes any changes, unexpected categorical expenditures and unexpended budget categories. Any categorical budget adjustments, changes, amendments or other types of changes must be reported
- c. Quarterly and Year-End Financial Report
 - i. Used to report program expenditures for the quarter or the Year-end respectively.
 - ii. Expenditures of funds must reconcile to the agency's General Ledger. If sub-ledgers are used, a process to reconcile the sub-ledger to the General Ledger must be in place.
 - iii. The Reimbursement Request may contain Unpaid Invoices (any unpaid invoice(s) for the quarter or the legal commitment for goods/services not yet paid),
 - iv. Year-end financial report cannot contain Unpaid Invoices.

Possible Errors

Reimbursement Request may not be approved for payment if:

- A. Narrative/Financial reports are late or submitted incorrectly
- B. Required documentation has not been received
- C. Any applicable Special Conditions have not been met

With the Reimbursement Request

- A. Request does not match reported expenditures for the quarter
- B. Requesting funds in advance on an estimated basis (excessive draw down of funds)
- C. Requesting funds when progress has not been made on grant activities

With Budget Revisions

- A. The letter has been submitted without the required reasons for the request
- B. The budget revision requested changes the program goals, this will require a Contract Amendment

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- C. Any changes in the program must be communicated to the state RJ Coordinator
- D. Must include a narrative explaining the need for the change
- E. Request should be made at least 60 days prior to the end of the grant award period
- F. All reports must be up-to-date for any change to be considered

Section III. Programmatic Compliance

Direct Services: RJ services are provided to resolve the harm or crime or conflict that has affect victims, offenders, their families and support people and the community. All program participants should be surveyed post process to measure their satisfaction with the process. All offenders should also receive a pre-process survey to assess their suitability for RJ and to gain a sense of their understanding of the RJ process and impact of their behavior. All offenders considered eligible by the Program Director or the criteria of the RJ program should be entered into the secure ETO database and tracked throughout their participation.

Client records: should be retained in a secure location electronically and/or in hard copy form. The confidentiality of all clients should be protected by the grant funded agency and all of its personnel. Written policies reflecting the grant funded agency's processes and procedures protecting the confidentiality of all program participants is highly recommended. These should be distributed to all personnel who have contact with program participants and retained in the master grant file.

RJ Program processes and procedures: should be documents and distributed to all RJ program personnel and updates provided as the program evolves. These documents should be retained in the master grant file.

Service Providers: any and all service providers including contracted parties, outside agencies, volunteers, agency personnel and any other RJ program involved parties providing any kind of service to the RJ program should be trained by qualified RJ trainers, receive regular support and debriefing form the RJ Program Director or other qualified support staff within the funded agency. All service providers must comply with the guidelines and agency policies.

Grant Goals and Objectives: Program Director is responsible for ensuring the grant goals and objectives are being pursued and met. Changes to the grant goals must be made in writing.

Training: If training is provided as a part of this grant an evaluation or survey of participants must be conducted to assess usefulness of the training and quality of the trainers. The number of participants for the training must be included with an agenda for the training. The surveys must be retained as a part of the master grant file. All service providers must receive appropriate training to provide RJ services.