



2023 Update PCCD STOP Formula Grantees

General Information Session

Why are we doing this?

Goal: Provide all current county STOP Formula Grant recipients with consistent and updated information about program requirements.

- Review of federal requirements under the Violence Against Women Act (VAWA);
- Provide updates that affect grantees as a result of the 2022 Reauthorization of VAWA;
- Set expectations for the next two years regarding monitoring and protocol development.

Breach of Personally Identifiable Information “PII”



What is Personally Identifiable Information or “PII” ?

Information that can be used to distinguish/trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

Policy Regarding Breach of PII

The applicant agency and any pass-throughs must have written procedures to respond when there is an imminent or actual breach of a system that:

- 1) Creates, collects, uses, processes, stores, maintains, disseminates, discloses or disposes of PII within the scope of a STOP funded project or activity.
- 2) Operates a Federal information system.

Policy Requirements:

Actual or imminent breach must be reported to PCCD within **24 hours** of detection.

Breach should be reported to your STOP Grant Program Contact in Egrants.

VAWA Confidentiality Requirements

The applicant agency and any pass-throughs must ensure the safety of victims and their families by protecting the confidentiality and privacy of persons receiving services through STOP funded programs.

VAWA Confidentiality Provision

Grantees cannot disclose, reveal or release individual client information without the consent of the person about whom the information is sought.

There are three exceptions:

1. When a victim provides a written, informed and reasonably time limited consent.
2. When the statute compels that the information be released.
3. When a court compels that the information be released.



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Criteria for Consent to Release Information

- Discuss the request for information with the victim;
 - *What kind of information could be shared*
 - *Why that information would be shared*
 - *Who would have access to the information*
- Reach agreement with the victim about what information will be shared and with whom;
- Record the agreement about the scope of release
- The release must specify the duration of time for which the information may be shared.

Prohibitions Against Trafficking

Applies to:

- ✓ Applicant agency
- ✓ Any employees of any pass through agency

Prohibits:

- Severe forms of trafficking in persons
- Procurement of a commercial sex act
- Use of forced labor in the performance of the award
- Acts that support or advance trafficking in persons



▶ Acts that support or advance trafficking

- Confiscating, destroying or denying access to immigration documents.
- Refusing to provide or pay for transportation back to the country the employee has been recruited from at the end of employment
- Hiring a person under false or fraudulent pretenses, promises or representations
- Charging recruited employees unreasonable recruitment fees
- Providing housing to an employee that fails to meet housing and safety standards

Determination of suitability to interact with participating minors

**REQUEST FOR
CRIMINAL BACKGROUND
CHECK**

Personal Information		(First)	(Middle Initial)	Home Telephone
Name (Last)	(City)	(State)	Zip	Other Telephone
Address (Mailing Address)				
E-Mail Address				
Services needed				
		Yes No		
		Major Subject		

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▶ Key Question to ask:

Do any STOP funded activities have the **purpose** of benefitting minors? (i.e. teen or adolescent support group, counseling, etc.)

- STOP funding can be used for victims aged 11 and up.

Who does this apply to?

- Applicant agency and pass-through organizations
- Any individual who is **LIKELY** to have contact with minor children *during the course of their work.*

How do I comply?

The recipient, and any subrecipient at any tier, agrees to comply with the Pennsylvania Child Protective Services Law (CPSL; [Title 23, PA. C. S., Chapter 63](#))

- Includes, but not limited to:
 - Obtaining appropriate clearances relevant to employment or volunteering
 - Mandated reporter training (if relevant to the position)
- Helpful information may be obtained by clicking on the following links:
 - [Clearances \(pa.gov\)](#)
 - Department of Human Services (DHS) website that provides guidance on and links to clearances.
 - [Trainings for Mandated Reporters \(pa.gov\)](#)
 - DHS Website that provides links to approved mandated reporter trainings
 - [Keep Kids Safe \(pa.gov\)](#)
 - DHS website that has links to report abuse, obtain clearances, FAQ's, trainings, and Family First

Documenting Suitability

- Documentation that the written determination is reviewed and updated every five years.
- Agencies will be required to complete the **Suitability to Work With Minors Tracking Sheet** and PCCD will review during the monitoring process.
 - [PA Suitability-to-Work-With-Minors Tracking Sheet](#)

HOW will PCCD be requesting you keep track?

- PCCD is providing a worksheet for guidance. When the search is done your program will be able to track on the sheet who the search was completed for and what websites or fingerprinting were done.
- During monitoring, to check for compliance, your monitor will request to review this sheet or your own method of tracking to ensure these searches are completed.

Suitability to Work and/or Interact with Minors Tracking Sheet

Organization Name: _____
Instructions: Provide Last Name and First Initial of each individual for which a determination is being made. Provide the dates the respective database searches were made and note the final suitability determination.

Grant Number(s): _____

Last Name	First Initial	Initial or Reexamination Review?	Dru Sjodin National Sex Offender Registry (Date)	Child Abuse History Clearance (Date)	PA Megan's Law Website or Applicable State Sex Offender Registries (Date)	PSP Criminal History Clearance (Date)	FBI Fingerprint Based Criminal History Search (Yes or No)	Final Suitability Determination (Suitable or Unsuitable)

I certify the information above is true and correct. The searches have been conducted on the dates described above. As a condition of state and/or federal funds under this program, we understand we must maintain a current written determination of suitability for each member interacting with individuals under the age of 18 years old. This form serves as the written determination of suitability for the members identified above. Documentation of these searches will be maintained in our own records to support these determinations should any questions or concerns arise during the course of our subaward.

•Printed Name: Title:

•Signature: Date:

•**Do Not** send or email background check results to PCCD

Workplace-related incidents of VAWA Crimes

The applicant agency and any pass throughs must have a policy which addresses:

- ✓ How to report allegations of workplace-related incidents of sexual misconduct, domestic violence, and dating violence by an
 - employee,
 - volunteer,
 - consultant, or
 - contractor



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Workplace Policy Re: VAWA Crimes

- ✓ Identifies workplace supports for employees, volunteers, consultants, or contractors who are victims of sexual misconduct, domestic violence, or dating violence



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- ✓ Adjudications that will result in an employee, volunteer, contractor, or consultant being prohibited from occupying positions that could undermine the ability of the recipient or subrecipient to carry out the grant-funded project, such as positions working with victims and other vulnerable populations.

[OVW Award Condition](#)

How do I comply?

- Monitoring:
 - This policy must be made available for review upon PCCD's request
 - PCCD recommends that STOP funded staff receive information on the policy at least once during the life of the project.

NOTE: PCCD monitors will only review to assess the three requirements of OVW; not the quality or legality of the policy. Please work with your legal and/or Human Resource Department on this matter.

▶ Training Requests – Two Scenarios

Attending a conference



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Hosting a Training



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Sending Staff to a Conference

- Send an email request to your program contact in Egrants.
- Request must contain:
 - Name and Date of Conference
 - Organization sponsoring conference
 - Agenda
 - Personnel you want to send (names, job titles)
 - Estimate of costs (registration, travel, subsistence, lodging, etc.)
 - Brief explanation of how it will benefit the STOP Project.

▶ Hosting a Training

- Send an email request to your program contact in Egrants.
- Request must contain:
 - Date of Training
 - Location
 - Target Audience
 - Estimate of Costs
 - Identify Trainer(s) and Topics
 - Estimated Number of Attendees
 - Describe how you will collect feedback.

▶ Hosting a Training

Eligible Expenses

- Travel and lodging
- Subsistence (meals not served at the conference center)
- Conference room rental
- Audio-visual equipment
- Printed materials
- External trainers/ facilitators
- Stationary supplies

Ineligible Expenses

- Meals and refreshments served at the conference*
- Trinkets
- Entertainment costs
- Trainings that focus exclusively on child abuse or child abuse investigations.

STOP limited to age 11 and above

* There **are** limited exceptions to this prohibition. Contact PCCD to discuss.

Four words to keep in mind for consultants

There are four words to keep in mind:

- Supportable – Do you have the backup documentation to justify the work this person performed on the project?
- Legitimate – Does the individual have the training, background and skills needed to do the services you require.
- Fair – Have you considered more than one individual or firm for this work?
- Reasonable – Does the rate charged for the services seem appropriate to the amount of effort and in comparison to other providers of the services?

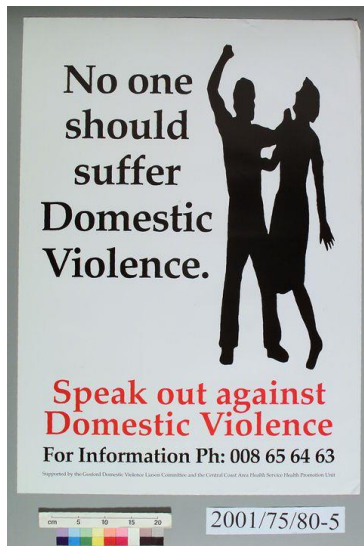
▶ Hosting a Training

Trainings funded by STOP must adhere to the following:

- Trainings must be in compliance with federal law, to include prohibition of discrimination
- Training content and materials must be accurate and applicable to program objectives
- Trainers must have experience and expertise on the subject matter being presented
- Grant recipients should do their due diligence in confirming the trainer's experience and expertise prior to scheduling the training
- Trainers should demonstrate professionalism and respect

Publications Disclaimer

- Applies to materials and publications resulting from STOP Grant activities
 - Written
 - Web-based
 - Audio-Visual



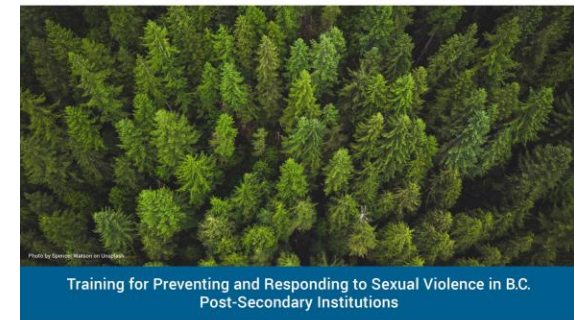
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Accountability and Repairing Relationships

TRAINING AND FACILITATION GUIDE



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Publications Disclaimer Continued

Place this verbiage somewhere on publication:

“This project was supported by Subgrant No. (insert PCCD grant number) awarded by PCCD for the federal Office on Violence Against Women, U.S. Department of Justice’s STOP Formula Grant Program. The opinions, findings, conclusions and recommendations expressed in this publication/program/exhibition are those of the author(s) and do not necessarily reflect the views of the commonwealth or the U.S. Department of Justice.”

2023: New Federal Certification

34 USC 10454 § 2017
Grant Eligibility Regarding
Compelling Victim Testimony

PCCD will send out revised
VAWA Eligibility Certification
Forms to current STOP
Recipients.



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New Certification VAWA 2022 Continued

- *In order for a prosecutor's office to be eligible to receive grant funds under STOP, the head of the office shall certify to PCCD, that the office will, during a three-year period beginning with the 2023 grant award, engage in planning, developing and implementing..."*
- Training by experts in the field regarding victim-centered approaches to VAW cases;
- Policies that support a victim-centered approach, informed by such training;
- A protocol outlining alternative practices and procedures for material witness petitions and bench warrants...that shall be exhausted before employing material witness petitions and bench warrants to obtain victim-witness testimony....

Protocol Development Tools

Culmination of two-year project with AOPC, PCADV, PCAR, PDAI and the PA Chiefs Association

Provide a detailed template to help counties develop comprehensive, multi-system response protocols.

Two separate tools

- Domestic Violence
- Sexual Assault

- Guidance and Technical Assistance available to County STOP Collaborative Teams
- Protocols don't have to look exactly like the tool; however, they do need to include all essential components outlined in the tool.

2023-2024 On-Site Monitoring

PCCD will be monitoring STOP funded programs over the next two years.

Will publish a schedule on the STOP area of the website so that grantees are aware of which year PCCD will monitor.

Monitoring Tool will continue to be electronic, using Microsoft Forms.

OVS staff will also be requesting to attend one STOP Team meeting of the county being monitored. This will not always be in conjunction with the monitoring visit.

Contact Information

PCCD Staff are available to provide assistance and answer questions.

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