



## Department of Public Safety

COUNCIL ON DOMESTIC VIOLENCE &  
SEXUAL ASSAULT  
Executive Director, Lauree Morton

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To: Karla Reinhardt, Board Chair  
Beth Bogarde, Executive Director  
From: Lauree Morton, Executive Director  
Date: 9/9/15  
Re: Probation Memo

The Council on Domestic Violence and Sexual Assault is placing WISH on probation for the remainder of the 2016 fiscal year. A timeline for remediation is to be established by WISH and approved by the Council by October 1, 2015. Financial reimbursement for victim services may be requested to coincide with the accomplishment of remedial steps to address the reported violations. After the remedial steps have been taken, the Council will move WISH to a monthly reimbursement basis for what may remain of the 2016 fiscal year.

The Council will review progress in meeting remedial steps during their regularly scheduled quarterly meetings and will make a determination during the May 2016 meeting as to whether or not WISH will be removed from probationary status and funded to provide victim services in FY2017.

All expenses incurred in completing the below remedial steps with the exception of step 3 are to be considered match to CDVSA funding.

WISH must complete the following actions and implement policies and procedures developed as a result of the actions according to the established timeline to be considered for funding in FY2017:

1. The Board of Directors shall conduct a planning process for the shelter as outlined in regulation **13 AAC 90.030**. The planning process will include an assessment of the service needs of the populations to be served to determine how differing populations can be served without the use of exclusionary practices. This planning process will identify how the agency will seek appropriate resources and services for participants. The planning process will include evaluation steps to be taken by the Board of Directors to ensure the resulting plan is being implemented.

2. Immediately, all employees, including shelter management, without the full 40 hours of training as required by regulations shall not work independently until the training requirements are met. Training can be met through the online ANDVSA advocacy program or be taught through a formal in-house training with CDVSA approved trainers. Training topics completed must be logged appropriately in personnel files along with supporting documentation of training completion.
3. The Board of Directors and Executive Director will review all signed CDVSA Assurances and Grant Award Conditions. The review must include a detailed examination of all cited federal and state statutory requirements contained within the Assurances and Conditions. After the review, a report to CDVSA must be generated to demonstrate understanding of all cited statutes. An attorney, approved by CDVSA, may be hired with CDVSA funds to assist WISH with this task.
4. The Board of Directors shall receive training on their roles and responsibilities to include their fiduciary responsibilities, by a trainer approved by CDVSA.
5. The Board of Directors, Executive Director and Human Resources Director shall receive training on employment law and practices with a trainer approved by CDVSA, and will make this same training available to all employees.
6. The Executive Director, Shelter Manager, and Assistant Shelter Manager shall shadow management staff equal to their positions with another Alaska shelter program identified by CDVSA.
7. WISH shall cooperatively enter into partner agreements with service providers in Ketchikan as well as providers within WISH's service area. Agreements must at a minimum include referral practices; procedures for obtaining program participant release of information authorization; and contingencies for partners to interact with program participants at the WISH facility. These agreements must be approved by CDVSA.
8. All staff must participate in trauma informed care training on a regular basis with a trainer approved by CDVSA. While some records indicate trauma informed care trainings have been attended by some staff, it is recommended staff is consistently trained on trauma informed philosophy and practices and ways to implement these into current shelter operations.

9. Ensure the grievance procedure is being followed properly, with access allowed to the Board of Directors in the case of an appeal. This recommendation corresponds with regulation 13 AAC 90.020 [5] which requires the governing body to approve all documents of the grantee that establish policy, including personnel policies. By approving policies the Board is obligated to review policies on an annual basis and ensure program compliance.