



Subrecipient Grant Administration Manual

**Fiscal Year
2022-23**

Victims of Crime Act

Family Violence Prevention & Services Act

- **COVID Testing, Vaccines & Mobile Health**
- **Support for Survivors of Sexual Assault**

State DV Bridge Funding

State Domestic Violence Dedicated Fund

Idaho Council ON
Domestic Violence
AND **Victim Assistance**

Idaho Council on Domestic Violence and Victim Assistance	
Staff and Council Member Contact Information	4
ICDVVA Team	4
Council Members	4
Introduction.....	5
Overview of ICDVVA.....	6
Our Purpose	6
Our Mission	6
Grant Administration Overview	6
Idaho Safety & Resilience Conference.....	7
Subrecipient Required and Ongoing Trainings.....	7
Applying for ICDVVA Funds.....	7
Eligible Applicants	8
Eligibility Requirements.....	8
Preparedness to Administer Grant.....	9
Activating Your ICDVVA Award.....	9
Available Funding Sources	9
Victims of Crime Act (VOCA) Assistance Grants.....	10
Purpose of the Grant.....	10
VOCA Subrecipient Organization Requirements.....	10
Allowable Direct Service Costs.....	14
Allowable Costs for Activities Supporting Direct Services	17
Allowable Subrecipient Indirect Costs	18
Unallowable Costs & Activities	20
Program Reporting Requirements	22
VOCA Definitions of Service	22
Family Violence Prevention and Services Act (FVSPA) Grants.....	25
Use of Funds.....	25
Unallowable Costs/Expenses.....	28
Program Match Requirements.....	29
Program Reporting Requirements	29
Confidentiality Requirements.....	29
Non-Discrimination Requirements.....	31
FVPSA Definitions.....	33
FVPSA Resources	37
FVPSA Covid Testing, Vaccines, & Mobile Health Unit and FVPSA	
Support for Survivors of Sexual Assault	38

Covid Testing, Vaccines & Mobile Health (TVMH) Funding.....	38
Sexual Assault/Rape Crisis Services & Supports (SA)	38
State DV Bridge Funding.....	38
Domestic Violence Project Account	39
Direct Victim Eligible Services.....	39
Eligibility Requirements.....	39
Program Match Requirement	39
Fiscal Administration for Subrecipients.....	40
Reimbursement Requests	40
Description of Budget Categories	41
Change Request Forms.....	43
Reporting	44
Performance Measurement Data Reporting	44
Program Outcomes Reports.....	45
Continuing Education Reporting.....	45
Compliance Monitoring Activities	46
Monitoring Standards & Procedures	46
Policy Development for Subrecipients.....	47
Federal Civil Rights (Non-discrimination Policy)	49
Office of Justice Programs Civil Rights Training	50
Limited English Proficiency (LEP)	50
Useful Websites/Resources.....	50

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Introduction

The Idaho Council on Domestic Violence and Victim Assistance (ICDVVA) created this manual to help subrecipients navigate some of the complexities associated with their grants. This manual is not comprehensive, and you may still encounter issues or questions related to managing your grant that are not covered here.

This manual does not replace the requirements in the Special Conditions attached to your subgrant agreement, which govern the use of VOCA funds. However, this manual should help you implement and abide by those special conditions more effectively.

This manual is one of many tools to guide the administration of your FY2023 subgrants. What follows is a detailed, though not exhaustive, description of the programmatic and financial guidelines you must follow to administer your grant funds successfully. The VOCA information contained in this manual is based on the [DOJ Financial Guide](#). ICDVVA encourages subrecipients to download this manual and refer to it when encountering questions or concerns related to their VOCA subgrant.

Please note that ICDVVA may also update this manual from time to time as legislation changes, new policies or guidance come from DOJ and/or HHS, new reimbursement or grant management policies are instituted at ICDVVA, or to address emerging issues subrecipients face. Staff will do their best to alert subrecipients about changes in this manual. You will know which version of the manual is the most recent by referencing the cover page of this document; always use the most recent version. Grant managers will email program directors when a new version is available on the ICDVVA website.

We have tried to make this manual as user-friendly as possible. All of the text that is hyperlinked in this manual is fully functional – to go to the webpage containing the information that is referred to in the text, simply click on the hyperlinked text.

If you feel the Council has not covered a certain topic thoroughly enough, or you see a gap in the topics covered in this manual, please give your feedback to one of the staff members listed on the cover page so we can consider it for the next version.

Thank you for all the work you do on behalf of victims of crime in the state of Idaho. We appreciate your service and dedication.

Overview of ICDVVA

Our Purpose

The Idaho Council on Domestic Violence and Victim Assistance (ICDVVA) is the state of Idaho's advisory body for programs and services affecting victims of domestic violence and other crimes in Idaho. (Pursuant to [Idaho code title 39-5201](#).)

Our Mission

To ensure victims of domestic violence, sexual assault, child abuse, and other violent crimes in Idaho have access to quality victim services which adequately address their needs and help them heal from trauma.

ICDVVA manages and subgrants federal funds any state appropriated federal funds, and funds allocated to the State of Idaho Domestic Violence Project Dedicated Fund (from marriage and divorce fees and violations of protection orders). In addition to administering these grants, ICDVVA also pursues other funds for victim services and may apply for competitive funding in partnership with subrecipient and local agencies through the Office for Victims of Crime, Family and Youth Services Bureau, and others as appropriate.

Grant Administration Overview

As the State Administering Agency (SAA) for VOCA funds & FVPSA funds, ICDVVA provides financial and programmatic management of your VOCA & FVPSA subawards. ICDVVA produces Requests for Proposal (RFPs) each year, collects and reviews applications, and makes award recommendations to the governing Council. Upon the Council's approval, ICDVVA is responsible for opening and closing each subaward in accordance with federal guidelines.

Financial management encompasses the following activities:

- Budget review and approval during the application process
- Activating awards through the award packet issuance and review and approval process
- Budget management through Subgrant Adjustment Requests (SARs) for VOCA awards
- Reviewing, approving, and processing payments via reimbursement requests
- Closing awards at the end of the fiscal year

ICDVVA provides programmatic management through the following activities:

- Program activity review and approval during the application process
- Reporting on service outputs and outcomes and other required data reporting
- Fidelity to VOCA & FVPSA guidelines on allowable activities
- Adherence to core services
- Ensuring availability and accessibility of services across the state
- Facilitating communication and coordination of ICDVVA funded programs with other stakeholders

ICDVVA also provides grants management to its subrecipients by conducting compliance monitoring activities such as onsite and remote monitoring and providing Training and Technical Assistance.

More information on each aspect of the grant management process is included in the subsequent sections. The appendix also includes numerous guides and resources to help you manage your agency's award.

Idaho Safety & Resilience Conference

June 5, 6, and 7, 2023 – The ICDVVA Safety & Resilience Conference will be held virtually in 2023. Registration will open in Spring 2023. We have released a Request for Proposals to solicit applications from those who would like to present at the conference. Proposals can be found [here](#) and are due no later than December 31, 2022.

Subrecipient Required and Ongoing Trainings

Mandatory Trainings conducted annually by ICDVVA staff:

- Grant Application Webinar
- Grant Administration Webinar
- Data Collection and Reporting Webinar

Ongoing Trainings:

- [Victim Assistance Training](#)
- [Human Trafficking Awareness Training](#)
- [Polyvictimization in Later Life](#)
- [Office of Justice Programs Civil Rights Training – note that this is required for each Executive Director to complete at least once every 3 years](#)

Applying for ICDVVA Funds

ICDVVA posts a Request for Proposals (RFP) annually (approximately April). The RFP contains all information required for each application, including application instructions and guidelines on allowable and unallowable costs. Generally, the application requires basic agency information, contact information, brief narratives on program activities and target population demographics, and a budget for the use of all requested funds. The application also requires submission of data on VOCA & FVPSA purpose areas, underserved populations, agency financial information, and other documentation as requested. A scoring rubric is published with the applications that sets out how applications will be scored and the available points for each question or section.

Once the application period has closed (at least 60 days after opening), two ICDVVA staff and two

Council members review and score applications according to a published scoring rubric. Staff tabulates the scores and makes award recommendations to the governing Council. The Council members vote to approve or deny applicants and set award amounts for funded programs.

Eligible Applicants

Eligible applicants must be a program operated by a public, tribal, or nonprofit organization, or a combination of such organizations, and provide direct services to crime victims. They must:

- Meet requirements specified by ICDVVA
- Use funds to provide or improve services to victims of crimes
- Not use funding to supplant other types of funding

Eligibility Requirements

To be eligible to receive funding from the Council, applicants must be a qualified entity (certain public agencies, non-profits registered/current with the Secretary of State, or a federally recognized tribe). Applicants for federal grants must also have a current SAM (System for Award Management) registration. The specific eligibility requirements vary slightly by funding stream as detailed in the annual grant application, but generally the following are required:

- Promote community efforts to aid crime victims.
- Not discriminate in admissions or services.
- Demonstrate a history of providing effective services to crime victims in a cost-effective manner and accessing financial support from other sources.
- Require staff and volunteers to hold confidential any information that would identify individuals unless required by law to disclose or disclosure is requested by the individual in writing consistent with the Council's Confidentiality Policy and state and federal law.
- Use volunteers unless compelling reasons exist to waive this requirement. The program must submit the request for a waiver in writing. This request must have written approval from ICDVVA.
- Provide crime victims with information and/or assistance in applying for crime victim compensation benefits.
- Provide services to victims at no charge.
- Provide services to victims of federal crimes as well as state crimes.
- Meet basic applicable standards as established by ICDVVA. Domestic Violence Shelters must comply with ICDVVA standards at the time of application.
- Comply with all contractual, program and financial standards, reporting, monitoring, and training requirements of ICDVVA. Failure to comply may result in the reduction, suspension, or termination of funding.
- Provide required in-kind and/or cash match. Must retain documentation supporting match.
- Provide current certificates of workers' compensation during the grant award contract.
- Provide current proof of a \$500,000.00 minimum comprehensive general liability insurance policy, including personal injury, broad form liability endorsement or blanket contractual liability during the grant award period.

- Provide current proof of professional (malpractice) liability insurance, if applicable, during the grant award contract. (Can use ICDVVA funds.)
- Ensure that ICDVVA funds will not be used to supplant federal, state, or other local funds.
- Comply with state and federal rules regulating grants and abide by the guidelines set forth.
- Report any criminal, civil, or administrative investigations and/or convictions, and any audit findings regarding the funded program in writing to ICDVVA within five (5) business days.
- Provide current proof of an active registration with SAM (System for Award Management) and any renewals during the award period. An active registration must be maintained for the entire period of the grant award.

Preparedness to Administer Grant

ICDVVA conducts organizational risk assessments for all funded programs/organizations. Prior to funding any program, ICDVVA requires that programs demonstrate they have:

- Successfully delivered services and meet program objectives specified in the subaward agreement
- Consistently submitted reports accurately and in a timely manner
- Ensured that staff that are in key (funded) positions have been appropriately trained.

ICDVVA completes risk assessments after programs are monitored using a Subrecipient Risk Assessment tool which takes a variety of factors into account; programs are classified as low risk, medium risk or high risk based on the risk assessment score. A copy of the current risk assessment tool and key to scoring criteria utilized in the risk assessment is attached as Appendix A. (Note that from time to time the risk assessment tool is updated to reflect best practices).

Activating Your ICDVVA Award

Successful applicants that choose to accept the ICDVVA grant award will sign a subaward agreement. The subaward agreement will be provided by the Department of Health and Welfare (DHW) and subrecipients will submit the signed agreement directly to DHW (with a cc to ICDVVA staff). The award is effective when the subaward agreement has been signed by both parties or on the start date of the current grant year, whichever is later.

Available Funding Sources

ICDVVA funding sources for FY2022–23 are:

- Victims of Crime Act (VOCA)
- DV Bridge Funding (Idaho State Fiscal Recovery Fund)
- Family Violence Prevention & Services Act Awards to States (FVPSA)
- FVPSA Covid Testing, Vaccines, and Mobile Health (FVPSA TVMH)
- FVPSA Support for Survivors of Sexual Assault (FVPSA SA)
- State Domestic Violence Project (Dedicated Funds from assessments collected on Idaho

marriage license and divorce filing fees)

Subrecipient budgets are finalized before the start of the grant year. A subrecipient may not charge costs to the grant that are not included in the final signed budget. Any changes to the final budget may occur only with approval in writing from appropriate ICDVVA employees.

Victims of Crime Act (VOCA) Assistance Grants

Purpose of the Grant

The VOCA Formula Grant Program, created under the Victims of Crime Act (VOCA) of 1984, as amended, 34 U.S.C. § 20110(e) and the regulation implementing the Victim of Crime Act Victim Assistance Program, 28 C.F.R. § 94.114, provides federal funding to support victim assistance and compensation programs to benefit victims, to provide training for diverse professionals who work with victims, to develop projects to enhance victims' rights and services, and to undertake public education and awareness activities on behalf of crime victims. The Victims of Crime Act established the Crime Victims Fund, which is the funding source for state formula VOCA grants.

VOCA is the largest federal victims' services funding stream in Idaho. This funding supports direct services to crime victims (i.e., persons who have suffered physical, sexual, financial, or emotional harm because of the commission of a crime). The federal Office for Victims of Crime (OVC) makes annual formula grants to states, which in turn are sub-granted to local organizations, to ensure that crime victims' rights are upheld and that they play a meaningful role in the criminal justice process. VOCA funds help local agencies comply with the requirements in Idaho's Crime Victims' Bill of Rights (Article 1, § 22), Idaho Code Sections 39-5201 through 39-5213, along with providing services that help crime victims confront the trauma and hardship associated with victimization. VOCA funds may be used to serve victims of many different types of crime including (but not limited to) child abuse, child sexual abuse, domestic violence or intimate partner violence, sexual assault, physical and financial elder abuse, identity theft, robbery, and burglary.

For questions regarding VOCA program guidelines, please refer to your grant manager or the following resources from OVC:

[Final Program Guidelines](#) (VOCA)

[Federal Register VOCA Final Rule](#)

VOCA Subrecipient Organization Requirements

VOCA establishes eligibility criteria that must be met by all organizations that receive VOCA funds. These funds are to be awarded to subrecipients only for providing services to victims of crime through their staff.

Program Match Requirements

The purpose of matching contributions is to increase the amount of resources available to the projects supported by grant funds. VOCA considers the total cost of your project to be the grant award plus the match amount. Matching contributions of 20% (cash or in-kind) of this total

project cost (VOCA grant plus match) are required for each VOCA-funded project and must be derived from non-federal sources, except as provided in the [DOJ Grants Financial Guide](#), effective edition (Part III. Post Award Requirements, Chapter 3. Matching or Cost Sharing). All funds designated as match are restricted to the same uses as the VOCA victim assistance funds and must be expended within the grant period. Match must be provided on a project-by-project basis. Any deviation from this policy must be approved by OVC. Native American Tribes/Organizations are not required to meet the match requirement.

VOCA Match Waiver

Effective July 22, 2021, The VOCA Fix to Sustain the Crime Victims Fund Act of 2021 was enacted. Section 3, Waiver of Matching Requirement, provides that each state must establish and make publish a policy regarding match waivers, and that beginning on the date a national emergency is declared with respect to a pandemic and ending one year after the expiration of such national emergency, match waivers shall be issued for all eligible programs to waive the VOCA match requirements in their entirety. This is not automatic; we have to receive and document requests.

All VOCA subrecipients must complete a match waiver for FY23. The form to request a match waiver is available at this [link](#). Tribes are not required to match federal funds.

Cash or In-Kind Project Match

For the purposes of this program, in-kind match may include donations of expendable equipment, office supplies, workshop or classroom materials, workspace, or the monetary value of time contributed by professionals and technical personnel and other skilled and unskilled labor, if the services they provide are an integral and necessary part of a funded project. The value placed on donated services must be consistent with the rate of compensation paid for similar work in the subrecipient's organization. If the required skills are not found in the subrecipient's organization, the rate of compensation must be consistent with the labor market. In either case, fringe benefits may be included in the valuation. The value placed on loaned or donated equipment may not exceed its fair market value. The value of donated space may not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in privately-owned buildings in the same locality. ([28 CFR §94.118](#))

Cash match may include, but is not limited to:

- County or state funds (excluding ICDVVA-administered state funds)
- Private donations
- Any other non-federal money

In-kind match may include, but is not limited to:

- Donations of equipment, office supplies – the value placed on loaned or donated equipment may not exceed its fair market value
- Workspace (pro-rated) – the value of donated space may not exceed the fair rental value of comparable space and facilities in a privately owned building in the same locality
- Non-VOCA funded victim assistance activities – The monetary value of these services

must reflect the rate of compensation for those employees performing the service and may include the costs of benefits. Services may include performing direct services, coordinating, or supervising those services, training victim assistance providers, or advocating for victims

- **Volunteers** – Volunteer services furnished by third-party professional and technical personnel, consultants, and other skilled and unskilled labor may be counted as cost sharing or matching if the service is an integral and necessary part of an approved project or program. Rates for third-party volunteer services must be consistent with those paid for similar work by the non-federal entity. In those instances in which the required skills are not found in the non-federal entity, rates must be consistent with those paid for similar work in the labor market in which the non-federal entity competes for the kind of services involved. In either case, paid fringe benefits that are reasonable, necessary, allocable, and otherwise allowable may be included in the valuation ([2 CFR § 200.306\(e\)](#)).

Calculating Project Match

The method of calculation is the same for both VOCA and FVPSA grants. Here we will use a VOCA grant as an illustration. If the VOCA award is \$50,000, match is computed by dividing the amount of the award by 0.80 and subtracting the amount of the award from the figure obtained. Thus, an organization that receives a \$50,000 VOCA award would be required to provide \$12,500 in match ($\$50,000 / 0.80 = \$62,500$, less the \$50,000 award amount, for a match totaling \$12,500).

Calculating Match Examples:	
TOTAL VOCA AWARD	\$50,000
Total Project Cost: $(50,000 / .80)$	\$62,500
Total VOCA Award	<u>-\$50,000</u>
Total Match Required	= \$12,500
OR	
Total Project Cost: $(50,000 / .80)$	\$62,500
Total Project Cost x 0.20 $(62,500 \times 0.20)$	<u>x .20</u>
Total Match Required	= \$12,500

Required Match Documentation

Subrecipients must maintain records that clearly show the source, the amount, and the period during which the match was allocated. The basis for determining the value of personal service, materials, equipment, and space must be documented. Volunteer services must be documented utilizing timesheets and a supervisor's signature. Match documentation must be submitted with the quarterly financial reports.

All matching contributions must be:

- Verifiable from the applicant's records.
- Not included as a contribution for any other federal funds.
- Necessary and reasonable to accomplish the project's goals.
- Allowable charges.
- Not paid by the applicant from federal funds received under another agreement, or any other funding source administered by ICDVVA.
- Included in the budget approved by ICDVVA.
- In accordance with all other federal and state requirements.

Volunteers

Subrecipient organizations must use volunteers unless ICDVVA determines there is a compelling reason to waive this requirement. A "compelling reason" may be a statutory or contractual provision concerning liability or confidentiality of counselor/victim information, which bars using volunteers for certain positions, or the inability to recruit and maintain volunteers after a sustained and aggressive effort. Volunteers must perform activities that support crime victims in order to qualify under this requirement.

Promote Community Efforts to Aid Crime Victims

Promote, within the community, coordinated public and private efforts to aid crime victims. Coordination may include, but is not limited to, serving on state, federal, local, or Native American task forces, commissions, working groups, coalitions, and/or multidisciplinary teams. Coordination efforts also include developing written agreements that contribute to better and more comprehensive services for crime victims. Coordination efforts qualify an organization to receive VOCA victim assistance funds but are not activities that can be supported with VOCA funds.

Help Victims Apply for Compensation Benefits

Such assistance may include identifying and notifying crime victims of the availability of Victims' Compensation, assisting them with application forms and procedures, obtaining necessary documentation, and/or checking on claim status. A recording from the ICDVVA 2021 Safety & Resilience Conference regarding the Crime Victims Compensation Program is available [here](#) and may be useful for training new employees.

Comply with Federal Rules Regulating Grants

Subrecipients must comply with the applicable provisions of VOCA and/or FVPSA, the Program Guidelines, and the requirements of the [DOJ Grants Financial Guide](#), effective edition, which includes maintaining appropriate programmatic and financial records that fully disclose the amount and disposition of VOCA funds received. This includes:

- Financial documentation for reimbursements;
- Daily time and attendance records specifying time devoted to allowable VOCA victim services or FVPSA victim services;
- Client files;
- The portion of the project supplied by other sources of revenue;

- Job descriptions and resumes for grant funded positions;
- Contracts for services; and
- Other records which facilitate an effective audit.

Maintain Civil Rights Information

Maintain statutorily required civil rights statistics on victims served by race, national origin, sex, age, and disability, within the timetable established by the state grantee; and permit reasonable access to its books, documents, papers, and records to determine whether the subrecipient is complying with applicable civil rights laws. This requirement is waived when providing a service, such as telephone counseling, where soliciting the information may be inappropriate or offensive to the crime victim. Executive Directors must complete DOJ Civil Rights Training at least once every three years and provide ICDVVA with evidence of completion.

Comply with State Criteria.

Subrecipients must abide by any additional eligibility or service criteria as established by the state grantee, including submitting statistical and programmatic information on the use and impact of VOCA or other funds, as requested by ICDVVA.

Services to Victims of Federal Crimes.

Subrecipients must provide services to victims of federal crimes on the same basis as victims of state/local crimes.

No Charge to Victims for VOCA-Funded Services.

Subrecipients must provide services to crime victims at no charge through the ICDVAA-funded project. Any deviation from this provision requires prior approval by ICDVVA.

Client-Counselor and Research Information Confidentiality.

Maintain confidentiality of client-counselor information, as required by state and federal law.

Confidentiality of Research Information.

Except as otherwise provided by federal law, no recipient of monies under VOCA shall use or reveal any research or statistical information furnished under this program by any person and identifiable to any specific private person for any purpose other than the purpose for which such information was obtained in accordance with VOCA. Such information, and any copy of such information, shall be immune from legal process and shall not, without the consent of the person furnishing such information, be admitted as evidence, or used for any purpose in any action, suit, or other judicial, legislative, or administrative proceeding. See Section 1407(d) of VOCA codified at [42 U.S.C. 10604](#).

Allowable Direct Service Costs

At least 60% of each grant award must fund Direct Service activities, which should be the case for the initial award and any budget adjustments. The following is a listing of services, activities, and costs that are eligible for support with VOCA grant funds:

Immediate Emotional, Psychological, and Physical Health and Safety

Services which respond to the immediate emotional and physical needs (excluding medical care) of crime victims, such as crisis intervention; accompaniment to hospitals for medical examinations; hotline counseling; safety planning; emergency food, clothing, transportation, and shelter; window, door, or lock replacement or repair, and other repairs necessary to ensure a victim's safety; costs of the following, on an emergency basis (i.e., when the State's compensation program, the victim's health insurance plan, Medicaid, or other health care funding source, is not reasonably expected to be available quickly enough to meet the emergency needs of a victim, typically within 48 hours of the crime): Non-prescription and prescription medicine, prophylactic or other treatment to prevent HIV/AIDS infection or other infectious disease, durable medical equipment (such as wheelchairs, crutches, hearing aids, eyeglasses), and other healthcare items are allowed; and emergency legal assistance such as filing for restraining or protective orders, and obtaining emergency custody orders and visitation rights. Other allowable legal assistance expenses under the current guidelines include but are not limited to: advocacy on behalf of crime victims during criminal proceedings; assistance in recovering restitution on behalf of crime victims; asserting crime victims' rights in criminal proceedings directly related to the victimization; and advocacy to protect victims' safety, privacy, or other interests as a victim in criminal proceedings. Additionally, in the civil proceeding context, services may include those that are reasonably needed as a direct result of the victimization, including but not limited to assistance in divorce, and child custody and support proceedings. Allowable legal assistance includes the funding of legal clinics. Criminal defense and tort lawsuits are not allowable legal expenses.

Personal Advocacy and Emotional Support

Personal advocacy and emotional support, including, but not limited to: working with a victim to assess the impact of the crime; identification of victim's needs; case management; management of practical problems created by the victimization; identification of resources available to the victim; provision of information, referrals, advocacy, and follow-up contact for continued services, as needed; and traditional, cultural, and/or alternative therapy/healing (e.g., art therapy, yoga).

Mental Health Counseling and Care

Mental health counseling and care, including, but not limited to, outpatient therapy/counseling (including, but not limited to, substance-abuse treatment so long as the treatment is directly related to the victimization) provided by a person who meets professional standards to provide these services in the jurisdiction in which the care is administered.

Peer-Support

Peer-support, including, but not limited to, activities that provide opportunities for victims to meet other victims, share experiences, and provide self-help, information, and emotional support.

Facilitation of Participation in Criminal Justice and Other Public Proceedings Arising from the Crime

The provision of services and payment of costs that help victims participate in the criminal justice system and in other public proceedings arising from the crime (e.g., juvenile justice hearings, civil commitment proceedings), including, but not limited to: advocacy on behalf of the victim; accompanying a victim to offices and court; transportation, meals, and lodging to allow a victim who is not a witness to participate in the proceeding; interpreting for a non-witness victim who is deaf or hard of hearing, or with limited English proficiency; providing childcare and respite care to enable a victim who is a caregiver to attend activities related to the proceeding; notification to victims regarding key proceeding dates (e.g., trial dates, case disposition, incarceration, and parole hearings); assistance with victim impact statements; assistance in recovering property that was retained as evidence; and assistance with restitution advocacy on behalf of crime victims.

Legal Assistance

Legal assistance services (including, but not limited to, those provided on an emergency basis), where reasonable and where the need for such services arises as a direct result of the victimization. Such services include, but are not limited to: those (other than criminal defense) that help victims assert their rights as victims in a criminal proceeding directly related to the victimization, or otherwise protect their safety, privacy, or other interests as victims in such a proceeding; motions to vacate or expunge a conviction, or similar actions, where the jurisdiction permits such a legal action based on a person's being a crime victim; and those actions (other than tort actions) that, in the civil context, are reasonably necessary as a direct result of the victimization. Examples (not meant to be a comprehensive listing) of some circumstances where civil legal services may be appropriate: Proceedings for protective/restraining orders or campus administrative protection/stay-away orders; family, custody, housing, and dependency matters, particularly for victims of intimate partner violence, child abuse, sexual assault, elder abuse, and human trafficking; immigration assistance for victims of human trafficking, sexual assault, and domestic violence; intervention with creditors, law enforcement (e.g., to obtain police reports), and other entities on behalf of victims of identity theft and financial fraud; intervention with administrative agencies, schools/colleges, tribal entities, and other circumstances where legal advice or intervention would assist in addressing the consequences of a person's victimization. VOCA funds may also be used to allow victims to file a motion to vacate and/or expunge certain convictions based on their status of being a victim.

Forensic Medical Evidence Collection Examinations

Forensic medical evidence collection examinations for victims, to the extent that other funding sources such as state appropriations are insufficient. Forensic medical evidence collection examiners are encouraged to follow relevant guidelines or protocols issued by the state or local jurisdiction. Subrecipients must provide appropriate crisis counseling and/or other types of victim services that are offered to the victim in conjunction with the examination. Subrecipients are also encouraged to use specially trained examiners such as Sexual Assault Nurse Examiners.

Forensic Interviews

Forensic interviews, with the following parameters: results of the interview will be used not only for law enforcement and prosecution purposes, but also for identification of needs such as social services, personal advocacy, case management, substance abuse treatment, and mental health services; interviews are conducted in the context of a multidisciplinary investigation and diagnostic team, or in a specialized setting such as a child advocacy center; and the interviewer is trained to conduct forensic interviews appropriate to the developmental age and abilities of children, or the developmental, cognitive, physical, or communication disabilities presented by adults.

Transportation

Transportation of victims to receive services and to participate in criminal justice proceedings.

Public Awareness

Public awareness and education presentations (including, but not limited to, the development of presentation materials, brochures, newspaper notices, and public service announcements) in schools, community centers, and other public forums that are designed to inform crime victims of specific rights and services and provide them with (or refer them to) services and assistance.

Transitional Housing and/or Housing as an Alternative to Communal Shelter

Subject to any restrictions set by the SAA on rent amount, length of time, and eligible crimes, transitional housing for victims and/or alternatives to community shelters (generally, those who have a particular need for such housing, and who cannot safely return to their previous housing, due to the circumstances of their victimization), including, but not limited to, travel, rental assistance, security deposits, utilities, and other costs incidental to the relocation to such housing, as well as voluntary support services such as childcare and counseling. Security deposits recovered at the end of a lease must be put back into housing funds for distribution to another victim and the program must maintain records on how deposit refunds are used.

Relocation

Subject to any restrictions set by the SAA on amount, length of time, and eligible crimes, relocation of victims (generally, where necessary for the safety and well-being of a victim), including, but not limited to, reasonable moving expenses, security deposits on housing, rental expenses, and utility startup costs. Security deposits recovered at the end of a lease should be put back into housing funds for distribution to another victim.

Allowable Costs for Activities Supporting Direct Services

Supporting activities for which VOCA funds may be used include, but are not limited to, the following:

Coordination of Activities

Coordination activities that facilitate the provision of direct services include, but are not limited to, statewide coordination of victim notification systems, crisis response teams, multidisciplinary teams, coalitions to support and assist victims, and other such programs, and salaries and

expenses of such coordinators.

Supervision of Direct Service Providers

State administrators may provide VOCA funds for payment of salaries and expenses of supervision of direct service providers when they determine that such supervision is necessary and essential to providing direct services to crime victims. For example, a state administrator may determine that using VOCA funds to support a coordinator of volunteers or interns is a cost-effective way of serving more crime victims.

Multi-System, Interagency, Multidisciplinary Response to Crime Victim Needs

Activities that support a coordinated and comprehensive response to crime victims' needs by direct service providers, including, but not limited to, payment of salaries and expenses of direct service staff serving on child and adult abuse multidisciplinary investigation and treatment teams, coordination with federal agencies to provide services to victims of federal crimes, and/or participation on statewide or other task forces, work groups, and committees to develop protocols, interagency, and other working agreements.

Contracts for Professional Services

Contracting for specialized professional services that are not available within the organization (e.g., psychological/psychiatric consultation, legal services, interpreters), at a rate not to exceed \$81.25/hour or \$650/day. Contact your grant manager if you would like to apply for a waiver to the \$81.25 hourly rate limit.

Automated Systems and Technology

Subject to the provisions of the DOJ Grants Financial Guide and government-wide grant rules relating to acquisition, use, and disposition of property purchased with federal funds, procuring automated systems and technology that support delivery of direct services to victims (e.g., automated information and referral systems, email systems that allow communication among victim service providers, automated case-tracking and management systems, smartphones, computer equipment, and victim notification systems), including, but not limited to, procurement of personnel, hardware, and other items, as determined by ICDVVA, considering: whether such procurement will enhance direct services; how any acquisition will be integrated into and/or enhance the program's current system; the cost of installation; the cost of training staff to use the automated systems and technology; the ongoing operational costs, such as maintenance agreements or supplies; and how additional costs relating to any acquisition will be supported. Federal Procurement Standards can be found in [2 CFR 200.318](#).

Volunteer Trainings

Activities in support of training volunteers on how to provide direct services when such services will be provided primarily by volunteers.

Allowable Subrecipient Indirect Costs

Administrative costs for which VOCA funds may be used by subrecipients include, but are not limited to, the following:

Administration

Subrecipients may not use more than 5% of their award for administrative salaries and benefits. Admin includes time spent performing the following: completing VOCA-required time and attendance sheets and programmatic documentation, reports, and statistics; collecting and maintaining crime victims' records; conducting victim satisfaction surveys and needs assessments to improve victim services delivery in the project; and funding the prorated share of audit costs.

Personnel Costs - Costs that are directly related to providing direct services, such as staff salaries and fringe benefits, including malpractice insurance; the cost of advertising to recruit VOCA-funded personnel; and the cost of training paid and volunteer staff.

Skills Training for Staff

Training exclusively for developing the skills of direct service providers, including paid staff and volunteers (both VOCA-funded and not), so that they are better able to offer quality direct services, including, but not limited to, manuals, books, videoconferencing, electronic training resources, and other materials and resources relating to such training.

Training-Related Travel

Training-related costs such as travel (in-state, regional, and national), meals, lodging, and registration fees for paid direct-service staff (both VOCA-funded and not). Preapproval is required for any training/travel expenses over \$500 (total cost for all employees participating) via the ICDVVA Training/Travel Request Form. Alcoholic beverages are not allowable expenses. Travel must be in compliance with State of Idaho Statewide Travel Regulations. Mileage driven between an employee's home and the subrecipient's address is not eligible for reimbursement.

Organization Expenses

Organizational expenses that are necessary and essential to providing direct services and other allowable victim services, including, but not limited to, the prorated costs of rent; utilities; local travel expenses for service providers; and required minor building adaptations necessary to meet the Department of Justice standards implementing the Americans with Disabilities Act and/or modifications that would improve the program's ability to provide services to victims.

Equipment and Furniture

Expenses for procuring furniture and equipment that facilitate the delivery of direct services (e.g., mobile communication devices, telephones, braille and TTY/TDD equipment, computers and printers, beepers, video cameras and recorders for documenting and reviewing interviews with children, two-way mirrors, colposcopes, digital cameras, and equipment and furniture for shelters, work spaces, victim waiting rooms, and children's play areas), except that the VOCA grant may be charged only the prorated share of an item that is not used exclusively for victim-related activities.

Operating Costs

Examples of allowable operating costs include supplies; equipment use fees, when supported by usage logs; property insurance; printing, photocopying, and postage; courier service; brochures that describe available services; books and other victim-related materials; computer backup

files/tapes and storage; security systems; design and maintenance of websites and social media; and essential communication services, such as web hosts and mobile device plans. Food and beverages for office use are not allowable expenses, including water delivery and coffee supplies.

Training Materials

VOCA funds can be used to purchase materials such as books, training manuals, and videos for direct service providers within the VOCA-funded organization and can support the costs of a trainer for in-service staff development when the amounts do not exceed federal standards. Staff from other organizations can attend in-service training activities that are held for the applicant staff. Food and beverages served at trainings are not allowable costs.

Maintenance, Repair, or Replacement of Essential Items

Costs of maintenance, repair, and replacement of items that contribute to maintenance of a healthy or safe environment for crime victims (such as a furnace in a shelter; and routine maintenance, repair costs, and automobile insurance for leased vehicles), after considering, at a minimum, if other sources of funding are available. Repair or replacement costs that exceed \$500 must be pre-approved by ICDVVA staff via the appropriate request form.

Indirect Cost Rates

Subrecipients that have a federally approved or state approved indirect cost rate may utilize their current agreed upon rate to request indirect rate reimbursement. Subrecipients must provide the appropriate documentation indicating the rate is approved and current. If no rate exists, the subrecipient may request a 10% de minimus rate as defined in the Code of Federal Regulations (annual edition) [Title 2 CFR 200.414 \(5\)\(f\)](#). If either of these methods is chosen, these costs must be included in the approved budget.

Unallowable Costs & Activities

Applicants may not request funds for the following services or activities. NOTE: This list is not exhaustive and ICDVVA maintains discretion in allowing or disallowing budget requests:

Lobbying

Lobbying or advocacy activities with respect to legislation or to administrative changes to regulations or administrative policy (cf. 18 U.S.C. 1913), whether conducted directly or indirectly. Research and Studies – Research and studies, except for project evaluation.

Active Investigation and Prosecution of Criminal Activities

The active investigation and prosecution of criminal activity, except for the provision of victim assistance services (e.g., emotional support, advocacy, and legal services) to crime victims, under § 94.119, during such investigation and prosecution.

Victim-Offender Meetings

Meetings that serve to replace criminal justice proceedings. Funds can cover costs associated with Restorative Justice for the victim ONLY. Any costs associated with the perpetrator's involvement in Restorative Justice efforts cannot be paid with VOCA funds. Funds cannot be used

for Restorative Justice efforts or victim-offender mediation with the community.

Food or Beverages

No funds can be used to purchase food and/or beverages for any meeting, conference, training or other event. Food and beverage costs are unallowable under any ICDVVA grant, with the exception of providing these items for use at a shelter. This restriction does not impact direct payment of per diem amounts to individuals attending a meeting or conference if they fall within the guidelines. Alcoholic beverages are never allowable expenses under federal grants.

Prosecution Activities

VOCA funds cannot be used to pay for activities that are directed at prosecuting an offender and/or improving the criminal justice system's effectiveness and efficiency, such as witness notification and management activities and expert testimony at a trial. In addition, victim witness protection costs and subsequent lodging and meal expenses are considered part of the criminal justice agency's responsibility and cannot be supported with VOCA funds.

Fundraising

Any activities related to fundraising.

Capital Expenses

Capital improvements; property losses and expenses; real estate purchases; mortgage payments; and construction (except as specifically allowed elsewhere in this subpart).

Compensation for Victims of Crime

Reimbursement of crime victims for expenses incurred because of a crime, except as otherwise allowed by other provisions of this subpart.

Promotional Merchandise

Branded giveaway items are not eligible for reimbursement.

Medical Care

Medical care, except as otherwise allowed by other provisions of this manual.

Salaries and Expenses of Management

Salaries, benefits, fees, furniture, equipment, and other expenses of executive directors, board members, and other administrators (except as specifically allowed elsewhere). In FY23, ED salary coverage will be capped at 93%, even for those EDs who perform direct services daily. The preference of ICDVVA is to cover as little ED salary as possible.

Costs of Sending Individual Crime Victims to Conferences

Activities Exclusively Related to Crime Prevention

Matching Other Federal Funds

Program Reporting Requirements

Programs receiving VOCA funds are required to submit quarterly reports on the OVC PMT <https://ojpsso.ojp.gov/>. The quarterly report due October 15th includes an additional annual narrative reporting section. (See REPORTING section for more details and access to online forms.)

Quarterly Financial Report

The table below details report due dates and time periods for the Quarterly Financial Report: This report includes match and match documentation

Quarter	Q1: October–December	Q2: January–March	Q3: April –June	Q4: July–September
Report Period Ending	December 31	March 31	June 30	September 30
Report Due	As part of Reimbursement Workbook containing December 31 in the expense period	As part of Reimbursement Workbook containing March 31 in the expense period	As part of Reimbursement Workbook containing June 30 in the expense period	As part of Reimbursement Workbook containing September 30 in the expense period

Performance Measurement Data Report

(See REPORTING section for more details and access to online forms)

Subgrant Award Report (SAR)

The Subgrant Award Report (SAR) is a requirement for state agency recipients that receive VOCA funding. The state uses the SAR to collect basic information on subrecipients and the program activities to be implemented with VOCA plus match funds. The data is submitted into the federal reporting system. For FY23, there are two parts to the SAR. Programs will submit SAR information via Jotform and the OVC PMT <https://ojpsso.ojp.gov/>. Subrecipient Project Directors will receive an email with log-in instructions to the PMT. The SAR Jotform and OVC PMT portions are due October 31st.

VOCA Definitions of Service

In-Person Crisis Counseling

Refers to in-person crisis intervention, emotional support, and guidance and counseling provided by advocates, counselors, mental health professionals, or peers. Such counseling may occur at the scene of a crime, immediately after a crime, or be provided on an ongoing basis. Crisis Counseling also includes assisting with death notifications to families of victims.

Follow-Up Contact

Refers to in-person contacts, telephone calls, and written communications with victims to offer emotional support, provide empathetic listening, check on a victim's progress, etc.

Therapy

Refers to intensive psychological and/or psychiatric treatment from a licensed and trained professional for individuals, couples, and family members for ongoing trauma or emotional

difficulty arising from the occurrence of a crime. This includes the evaluation of mental health needs, as well as the actual delivery of psychotherapy.

Group Treatment

Refers to the coordination and provision of supportive group activities and includes self-help, peer social support, etc.

Assistance Placing Animals in Distress

Refers to assistance with placement of an animal that belongs to a victim and that may be in danger in the victim's home to a shelter or other appropriate venue.

Assistance in Applying for TANF/Social Services

Includes making victims aware of the availability of Temporary Assistance for Needy Families (TANF) benefits and related social services, assisting the victim in completing the required forms, gathering the needed documentation, etc. It may also involve accompanying the victim to the social service agency and making follow-up contact with the social service agency on behalf of the victim.

Safe Shelter or Safe House

Refers to offering short- and long-term housing and related support services to victims and families following a victimization. Includes transitional housing. Related support services include meals, clothing, toiletries, and other supplies provided to victims and family members (children) accompanying them in shelter.

In-Person Information/Referral

Refers to in-person contacts with victims during which time services and available support are identified. Includes safety planning with victim, the entire intake process, case management contacts to determine if referrals were followed up & satisfactory, etc.

Criminal Justice Support/Advocacy

Refers to support, assistance, and advocacy provided to victims at any stage of the criminal justice process, to include post-sentencing services and support. Can be provided by all victim assistance agencies. See list of specific services below provided by prosecution-based and law enforcement-based victim witness assistance programs.

Emergency Financial Support

Refers to cash outlays for transportation, food, clothing, emergency housing, etc.

Emergency and Non-Emergency Legal Advocacy

Emergency Legal Advocacy refers to filing of ex parte protection orders, injunctions, requesting bond conditions and other protective orders, elder abuse petitions, and child abuse petitions during emergency or crisis circumstances, but does not include criminal prosecution or the employment of attorneys for non-emergency purposes such as custody disputes, civil suits, etc. Includes assisting victims with the warrant application process and attending related pre-warrant

court hearings.

Non-emergency Legal Advocacy refers to follow-up hearings related to converting ex parte protection orders to permanent orders; assistance at hearings regarding temporary protection order violations; filing for immigration status or immigration relief; assistance with civil matters such as custody or visitation that are necessary to keep the victim safe; legal assistance with eviction or adversary employment actions arising from the victimization; and the provision of information and advocacy about health insurance, harassment, and related legal issues.

Assistance in Filing Victims' Compensation

- Notification of Eligibility - Includes alerting the victim either in person, via mail, via telephone, or via email about the existence of the Crime Victims Compensation Program.
- Review of Eligibility Requirements - Includes explaining to the victim either in person, via mail, via telephone, or via email what kinds of crimes are eligible for compensation, what kinds of expenses are compensable, the steps necessary to initiate an application, rules regarding the timeframe within which the crime must be reported, and an explanation about the likelihood of successful appeal if the victim fails to meet one of the preliminary requirements.
- Assistance Completing an Application - Includes walking the victim through completing the compensation application either in person or via the telephone and explaining to the victim the necessary documents and fields within an application to make an application complete.
- Assistance Gathering Documents or Submitting an Application - Includes helping the victim gather necessary documents such as law enforcement reports, itemized bills, and income verification forms to submit a complete victims' compensation application. Assisting the victim with gathering the documents and submitting the application, including mailing the application on the victim's behalf.
- Follow-up - Includes contacting the Crime Victims Compensation Program to check the status of a victim's application, assisting the victim with an appeal, helping the victim respond to correspondence from the Crime Victims Compensation Program, or following up with providers regarding necessary itemized bills on the victim's behalf.

Personal Advocacy

Refers to assisting victims in securing rights, remedies, and services from other agencies; locating emergency financial assistance; intervening with employers, school administrators, creditors, bill collectors, landlords, and others on behalf of the victim; assisting in filing for losses covered by public and private insurance programs; accompanying the victim to the hospital, etc. Does not include assistance filing for unemployment benefits, TANF, and other such services which should be reported under "Assistance Applying for TANF/Social Services."

Telephone Contacts

Refers to provision of crisis hotline telephone counseling by trained professionals or volunteers on a 24 hour/7 day a week basis. Includes telephone contacts with victims during which services and available support are identified. Includes non-emergency safety planning with victim, initial

assessment interviews, case management contacts to determine if referrals were followed up and satisfactory, etc.

Forensic Interviews

Refers to the provision of a forensic interview of a victim in order to provide direct services, including referrals. This service may only be counted towards volunteer time if it meets the following criteria:

- Results of the interview will be used not only for law enforcement and prosecution purposes, but also for identification of needs such as social services, personal advocacy, case management, substance abuse treatment, and mental health services;
- Interviews are conducted in the context of a multidisciplinary investigation and diagnostic team, or in a specialized setting such as a child advocacy center;
- The interviewer is trained to conduct forensic interviews appropriate to the developmental age and abilities of children, or the developmental, cognitive, physical, or communication disabilities presented by adults; and
- VOCA victim assistance funds are not used to supplant other state and local public funding available for forensic interviews, including criminal justice funding.

Family Violence Prevention and Services Act (FVSPA) Grants

FVPSA funding, administered through the Administration on Children, Youth, and Families' (ACYF) Family and Youth Services Bureau (FYSB), is designed to assist states in their efforts to support the establishment, maintenance, and expansion of programs and projects to: 1) prevent incidents of family violence, domestic violence, and dating violence; 2) provide immediate shelter, supportive services, and access to community-based programs for victims of family violence, domestic violence, or dating violence, and their dependents; and 3) provide specialized services for children exposed to family violence, domestic violence, or dating violence; underserved populations; and victims who are members of racial and ethnic minority populations ([42 CFR § 10406.\(a\)\(1\)\(2\)\(3\)](#)).

The FVPSA state formula grant funds shall be used to identify and provide subgrants to eligible entities for programs and projects within the state that are designed to prevent incidents of family violence, domestic violence, and dating violence by providing immediate shelter and supportive services; and that may include paying for the operating and administrative expenses of the facilities for a shelter, for adult and youth victims of family violence, domestic violence, or dating violence, and their dependents; and that may be used to provide prevention services to prevent future incidents of family violence, domestic violence, and dating violence ([42 U.S.C. § 10408\(a\)](#) and [42 U.S.C. § 10408\(b\)\(1\)\(A\)](#)).

Use of Funds

In the distribution of FVPSA grant funds, ICDVVA must ensure that not less than 70 percent of the funds distributed are used for the primary purpose of providing immediate shelter and supportive services to adult and youth victims of family violence, domestic violence, or dating

violence, and their dependents; not less than 25 percent of the funds will be used for the purpose of providing supportive services and prevention services (42 U.S.C. § 10408(b)(2)); and not more than 5 percent of the FVPSA grant funds may be used for state administrative costs (42 U.S.C. § 10406(b)(1)).

The FVPSA Grant is Intended to Fund:

- Provision, on a regular basis, of immediate shelter and related supportive services to adult and youth victims of family violence, domestic violence, or dating violence, and their dependents, including paying for the operating and administrative expenses of the facilities for such shelter ([42 U.S.C. § 10408\(b\)\(1\)\(A\)](#));
- Assistance in developing safety plans and supporting efforts of victims of family violence, domestic violence, or dating violence to make decisions related to their ongoing safety and well-being ([42 U.S.C. § 10408\(b\)\(1\)\(B\)](#));
- Provision of individual and group counseling, peer support groups, and referral to community-based services to assist family violence, domestic violence, and dating violence victims, and their dependents, in recovering from the effects of the violence ([42 U.S.C. § 10408\(b\)\(1\)\(C\)](#));
- Provision of services, training, technical assistance, and outreach to increase awareness of family violence, domestic violence, and dating violence, and increase the accessibility of family violence, domestic violence, and dating violence services ([42 U.S.C. § 10408\(b\)\(1\)\(D\)](#));
- Provision of culturally and linguistically appropriate services ([42 U.S.C. § 10408\(b\)\(1\)\(E\)](#));
- Provision of services for children exposed to family violence, domestic violence, or dating violence, including age-appropriate counseling, supportive services, and services for the non-abusing parent that support that parent's role as a caregiver, which may, as appropriate, include services that work with the non-abusing parent and child together ([42 U.S.C. § 10408\(b\)\(1\)\(F\)](#));
- Provision of advocacy, case management services, and information and referral services concerning issues related to family violence, domestic violence, or dating violence intervention and prevention, including: 1) assistance in accessing related federal and state financial assistance programs; 2) legal advocacy to assist victims and their dependents; 3) medical advocacy, including provision of referrals for appropriate health care services (including mental health, alcohol, and drug abuse treatment), which does not include reimbursement for any health care services; 4) assistance locating and securing safe and affordable permanent housing and homelessness prevention services; 5) provision of transportation, childcare, respite care, job training and employment services, financial literacy services and education, financial planning, and related economic empowerment services; and 6) parenting and other educational services for victims and their dependents ([42 U.S.C. § 10408\(b\)\(1\)\(G\)](#)); and
- Provision of prevention services, including outreach to underserved populations ([42 U.S.C. § 10408\(b\)\(1\)\(H\)](#)).
- No funds provided under FVPSA may be used as direct payment to any victim of family violence, domestic violence, or dating violence, or to any dependent of such victim ([42](#)

[U.S.C. § 10408\(D\)\(1\)](#).

The following list is eligible uses of FVPSA funds for survivors of family violence, domestic violence, or dating violence and their dependents. This list is not all inclusive:

- Immediate shelter and related supportive services
- Safety planning
- Individual and group counseling
- Peer support groups
- Information and referrals
- Prevention services and campaigns
- Training and technical assistance
- Public awareness and campaigns
- Culturally and linguistically appropriate services
- Services for children exposed to family violence, domestic violence, or dating violence
- Advocacy
- Case management services
- Legal and medical advocacy
- Assistance in securing other resources, including safe and affordable permanent housing and homelessness prevention services
- Transportation
- Childcare
- Job training and employment services
- Financial planning
- Literacy services
- Economic empowerment services
- Parenting and education services

Indirect Funds

Personnel/Fringe. Regular salaries, FICA, Employee Benefits; permanent hourly labor, temporary/casual labor.

Travel

Funds must be budgeted in compliance with State of Idaho Statewide Travel Regulations (e.g. mileage, meals, lodging, incidentals, and airfare) and for business purposes (e.g., training, meetings, etc.). Mileage driven between an employee's home and the subrecipient's address is not eligible for reimbursement.

Equipment

Office equipment must be listed in your budget proposal.

Supplies

Supplies (e.g., office supplies, postage, copier usage, training supplies, publications, audio/video, office furniture, computer software, educational/therapeutic supplies). Please note that bottled

water, food, and coffee supplies are not allowable under office supplies.

Printing

Printed items (e.g., letterhead/envelopes, business cards, training materials).

Other Costs

Office space lease and utilities, telephone, internet charges, pagers, cell phones, repairs/maintenance, insurance and bonding, dues & subscriptions, advertising, registration fees, client assistance.

Telecommunications/Telephone

Telephone, internet charges, pagers, cell phones.

Training/Conferences

Registration fees or tuition.

Travel

Lodging, meals, use of vehicle for job-related activities mileage.

Unallowable Costs/Expenses

- Active investigation and prosecution of criminal activities
- Awards, bonuses, or commissions
- Commingling of funds. Physical segregation of cash deposits are not required, however, the accounting system of all subrecipients must ensure that agency funds are not commingled with funds from other federal agencies. Each award must be accounted for separately. Commingling of funds is prohibited on either a program-by-program or project-by-project basis.
- Costs incurred outside the award period
- Construction, land and/or property acquisitions, modifications to buildings, or vehicle purchases are unallowable. This includes mortgage payments.
- Construction costs including capital improvements
- Corporate entertainment. Luncheons, dinners, banquets, receptions.
- Direct services may not teach or promote religion
- Federal employees' compensation and travel
- Food or Beverages (including both alcoholic and nonalcoholic)
- Fundraising
- Grant funds may not be used as direct payment to any victim (e.g., cash, gift cards, or checks written to clients). Subrecipients may submit specific gift card policies to ICDVVA; once approved by ICDVVA, the subrecipient may abide by its policy to provide clients with access to basic needs (groceries, gas, etc.) via gift cards. All gift cards should be distributed to victims during the grant year in which they were purchased.
- Lobbying
- Magazine subscriptions, printing or disseminating agency newsletters, or membership

- dues or fees
- Medical Care
- Military-type equipment
- Political activities including endorsement of any political candidate or party
- Promotional giveaway items, such as branded merchandise
- Property loss
- Research and Studies, Surveys, Evaluations, and Needs Assessment
- Supplanting of funds

Program Match Requirements

The purpose of matching contributions is to increase the amount of resources available to the projects supported by grant funds. FVPSA considers the total cost of your project to be the grant award plus the match amount. Matching contributions of 20% (cash or in-kind) of this total project cost (FVPSA grant plus match) are required for each FVPSA-funded project and must be derived from non-federal sources. All funds designated as match are restricted to the same uses as the FVPSA funds and must be expended within the grant period. Match must be provided on a project-by-project basis, and can be cash or in-kind. For more details on calculating match, see the description under VOCA Program Match Requirements.

Program Reporting Requirements

Subrecipients receiving FVPSA funds are required to submit quarterly reports to ICDVVA on the forms provided at <https://icdv.idaho.gov/grantees/forms-and-reporting/>.

Financial Report

Reports must include match and match documentation.

Quarter	Q1: October–December	Q2: January–March	Q3: April–June	Q4: July–September
Report Period Ending	December 31	March 31	June 30	September 30
Report Due	As part of Reimbursement Workbook containing December 31 in the expense period	As part of Reimbursement Workbook containing March 31 in the expense period	As part of Reimbursement Workbook containing June 30 in the expense period	As part of Reimbursement Workbook containing September 30 in the expense period

Performance Measurement Data Report

FVPSA quarterly Performance Measurement Data Reports are due January 15, April 15, July 15, and October 15. The federal fourth quarter report (due October 15th) includes an additional annual narrative reporting section. (See REPORTING section for more details and access to online forms.)

Confidentiality Requirements

To ensure the safety of adult, youth, and child victims of family violence, domestic violence, or dating violence, and their families, grantees and subrecipients under FVPSA shall protect the

confidentiality and privacy of such victims and their families. Subrecipients shall not:

- Disclose any personally identifying information collected in connection with services requested (including services utilized or denied) through grantees' and subrecipients' programs.
- Reveal any personally identifying information without informed, written, reasonably time-limited consent by the person about whom information is sought, whether for this program or any other Federal, Tribal or State grant program, including but not limited to whether to comply with Federal, Tribal, or State reporting, evaluation, or data collection requirements.
- Require an adult, youth, or child victim of family violence, domestic violence, and dating violence to provide a consent to release his or her personally identifying information as a condition of eligibility for the services provided by the grantee or subrecipient.

Consent shall be given by the person, except in the case of an un-emancipated minor it shall be given by both the minor and the minor's parent or guardian; or in the case of an individual with a guardian it shall be given by the individual's guardian. A parent or guardian may not give consent if he or she is the abuser or suspected abuser of the minor or individual with a guardian; or, if he or she is the abuser or suspected abuser of the other parent of the minor. If a minor or a person with a legally appointed guardian is permitted by law to receive services without the parent's or guardian's consent, the minor or person with a guardian may release information without additional consent. Reasonable accommodations shall also be made for those who may be unable, due to disability or other functional limitation, to provide consent in writing.

If the release of information described above in this section is compelled by statutory or court mandate:

- Grantees and subrecipients shall make reasonable attempts to provide notice to victims affected by the release of the information.
- Grantees and subrecipients shall take steps necessary to protect the privacy and safety of the persons affected by the release of the information.

Grantees and subrecipients may share:

- Non-personally identifying information, in the aggregate, regarding services to their clients and demographic non-personally identifying information to comply with Federal, State, or Tribal reporting, evaluation, or data collection requirements.
- Court-generated information and law enforcement-generated information contained in secure, governmental registries for protective order enforcement purposes.
- Law enforcement- and prosecution-generated information necessary for law enforcement and prosecution purposes.
- Personally identifying information may be shared with a health care provider or payer, but only with the informed, written, reasonably time-limited consent of the person about whom such information is sought.

Nothing in this section prohibits a grantee or subrecipient, where mandated or expressly permitted by the State or Indian Tribe, from reporting abuse and neglect, as those terms are

defined by law, or from reporting imminent risk of serious bodily injury or death of the victim or another person.

Nothing in this section shall be construed to supersede any provision of any Federal, State, Tribal, or local law that provides greater protection than this section for victims of family violence, domestic violence, or dating violence.

The address or location of any shelter facility assisted that maintains a confidential location shall, except with written authorization of the person or persons responsible for the operation of such shelter, not be made public.

Shelters which choose to remain confidential pursuant to this rule must develop and maintain systems and protocols to remain secure, which must include policies to respond to disruptive or dangerous contact from abusers.

Tribal governments, while exercising due diligence to comply with statutory provisions and this rule, may determine how best to maintain the safety and confidentiality of shelter locations.

Non-Discrimination Requirements

No person shall on the ground of actual or perceived sex, including gender identity, be excluded from participation in, be denied the benefits of, or be subject to discrimination under, any program or activity funded in whole or in part through FVPSA.

FVPSA grantees and subrecipients must provide comparable services to victims regardless of actual or perceived sex, including gender identity. This includes not only providing access to services for all victims, including male victims, of family, domestic, and dating violence regardless of actual or perceived sex, including gender identity, but also making sure not to limit services for victims with adolescent children (under the age of 18) on the basis of the actual or perceived sex, including gender identity, of the children. Victims and their minor children must be sheltered or housed together, regardless of actual or perceived sex, including gender identity, unless requested otherwise or unless the factors or considerations identified in § 1370.5(a)(2) require an exception to this general rule.

No such program or activity is required to include an individual in such program or activity without taking into consideration that individual's sex in those certain instances where sex is a bona fide occupational qualification or a programmatic factor reasonably necessary to the essential operation of that particular program or activity. If sex segregation or sex-specific programming is essential to the normal or safe operation of the program, nothing in this paragraph shall prevent any such program or activity from consideration of an individual's sex. In such circumstances, grantees and subrecipients may meet the requirements of this paragraph by providing comparable services to individuals who cannot be provided with the sex-segregated or sex-specific programming, including access to a comparable length of stay, supportive services, and transportation as needed to access services. If a grantee or subrecipient determines that sex-segregated or sex-specific programming is essential for the normal or safe operation of the

program, it must support its justification with an assessment of the facts and circumstances surrounding the specific program, including an analysis of factors discussed in paragraph (a)(3) of this section, and take into account established field-based best practices and research findings, as applicable. The justification cannot rely on unsupported assumptions or overly broad sex-based generalizations. An individual must be treated consistent with their gender identity in accordance with this section.

Factors that may be relevant to a grantee's or subrecipient's evaluation of whether sex-segregated or sex-specific programming is essential to the normal or safe operations of the program include, but are not limited, to the following: the nature of the service, the anticipated positive and negative consequences to all eligible beneficiaries of not providing the program in a sex-segregated or sex-specific manner, the literature on the efficacy of the service being sex-segregated or sex-specific, and whether similarly-situated grantees and subrecipients providing the same services have been successful in providing services effectively in a manner that is not sex-segregated or sex-specific. A grantee or subrecipient may not provide sex-segregated or sex-specific services for reasons that are trivial or based on the grantee's or subrecipient's convenience.

As with all individuals served, transgender and gender nonconforming individuals must have equal access to FVPSA-funded shelter and nonresidential programs. Programmatic accessibility for transgender and gender nonconforming survivors and minor children must be afforded to meet individual needs consistent with the individual's gender identity. ACF requires that a FVPSA grantee or subrecipient that makes decisions about eligibility for or placement into single-sex emergency shelters or other facilities offer every individual an assignment consistent with their gender identity. For assigning a service beneficiary to sex-segregated or sex-specific services, the grantee/subrecipient may ask a beneficiary which group or services the beneficiary wishes to join. The grantee/subrecipient may not, however, ask questions about the beneficiary's anatomy or medical history or make demands for identity documents or other documentation of gender. A victim's/beneficiary's or potential victim's/beneficiary's request for an alternative or additional accommodation for purposes of personal health, privacy, or safety must be given serious consideration in making the placement. For instance, if the potential victim/beneficiary requests to be placed based on his or her sex assigned at birth, ACF requires that the provider will place the individual in accordance with that request, consistent with health, safety, and privacy concerns of the individual. ACF also requires that a provider will not make an assignment or reassignment of the transgender or gender nonconforming individual based on complaints of another person when the sole stated basis of the complaint is a victim/client or potential victim/client's non-conformance with gender stereotypes or sex, including gender identity.

An organization that participates in programs funded through FVPSA shall not, in providing services, discriminate against a program beneficiary or prospective program beneficiary on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

Dietary practices dictated by religious beliefs may require reasonable accommodation in cooking or feeding arrangements for beneficiaries as practicable. Additionally, other forms of religious practice may require reasonable accommodation including, but not limited to, shelters that have cleaning schedules that may need to account for a survivor's religion which prohibits him/her from working on religious holidays.

All FVPSA-funded services must be provided without requiring documentation of immigration status because HHS has determined that FVPSA-funded services do not fall within the definition of a federal public benefit that would require verification of immigration status.

Grantees and subrecipients should create a plan to ensure effective communication and equal access, including:

- How to identify and communicate with individuals with Limited English Proficiency, and how to identify and properly use qualified interpretation and translation services, and taglines.
- How to take appropriate steps to ensure that communications with applicants, participants, beneficiaries, members of the public, and companions with disabilities are as effective as communications with others; and furnish appropriate auxiliary aids and services where necessary to afford qualified individuals with disabilities, including applicants, participants, beneficiaries, and members of the public, an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity. Auxiliary aids and services include qualified interpreters and large print materials.
- Nothing in this section shall be construed to invalidate or limit the rights, remedies, procedures, or legal standards available to individuals under other applicable law.

FVPSA Definitions

Community Education

Presentations or trainings about domestic violence and/or services related to victims of domestic violence and their children. Some examples may be a training session for health professionals or workshop for tribal leaders. This does not include health fairs, media interviews, or advertising.

Criminal/Civil Legal Advocacy

Assisting a client with civil legal issues, including preparing paperwork for protection orders; accompanying a client to a protection order hearing, or other civil proceedings; and all other advocacy within the civil justice system. This also includes accompanying a client to an administrative hearing, such as unemployment, Social Security, TANF, or food stamp hearing; assisting a client with criminal legal issues including notifying the client of case status, hearing dates, plea agreements, and sentencing terms; preparing paperwork such as victim impact statements; accompanying a client to a criminal court proceeding or law enforcement interview; and all other advocacy within the criminal justice system.

Crisis/Hotline Calls

Calls received on any agency line that relate to an individual or family in need of service. A

program does not have to have a dedicated hotline to count these calls.

Crisis Intervention

Process by which a person identifies, assesses, and intervenes with an individual in crisis to restore balance and reduce the effects of the crisis in her/his life.

Dating Violence

Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim and where the existence of such a relationship shall be determined based on a consideration of the following factors: The length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. This part of the definition reflects the definition also found in Section 40002(a) of VAWA (as amended), 42 U.S.C. 13925(a), as required by FVPSA. Dating violence also includes but is not limited to the physical, sexual, psychological, or emotional violence within a dating relationship, including stalking. It can happen in person or electronically and may involve financial abuse or other forms of manipulation which may occur between a current or former dating partner regardless of actual or perceived sexual orientation or gender identity.

Domestic Violence

Felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction. This definition also reflects the statutory definition of "domestic violence" found in Section 40002(a) of VAWA (as amended), 42 U.S.C. 13925(a). This definition also includes but is not limited to criminal or non-criminal acts constituting intimidation, control, coercion and coercive control, emotional and psychological abuse and behavior, expressive and psychological aggression, financial abuse, harassment, tormenting behavior, disturbing or alarming behavior, and additional acts recognized in other Federal, Tribal, State, and local laws as well as acts in other Federal regulatory or sub-regulatory guidance. This definition is not intended to be interpreted more restrictively than FVPSA and VAWA but rather to be inclusive of other, more expansive definitions. The definition applies to individuals and relationships regardless of actual or perceived sexual orientation or gender identity.

Family Violence

Any act or threatened act of violence, including any forceful detention of an individual, that results or threatens to result in physical injury and is committed by a person against another individual, to or with whom such person is related by blood or marriage, or is or was otherwise legally related, or is or was lawfully residing.

Individual or Group Counseling/Support Groups

Individual or group counseling or support provided by a volunteer, staff member, or advocate.

Medical Accompaniment

Accompanying a domestic violence victim to, or meeting a victim at a hospital, clinic, or medical office.

Personally Identifying Information (PII)

Individually identifying information for or about an individual including information likely to disclose the location of a victim of domestic violence, dating violence, sexual assault, or stalking, regardless of whether the information is encoded, encrypted, hashed, or otherwise protected, including a first and last name; a home or other physical address; contact information (including a postal, email or Internet protocol address, or telephone or facsimile number); a social security number, driver license number, passport number, or student identification number; and any other information, including date of birth, racial or ethnic background, or religious affiliation, that would serve to identify any individual.

Primary Prevention

Strategies, policies, and programs to stop both first-time perpetration and first-time victimization. Primary prevention is stopping domestic and dating violence before they occur. Primary prevention includes but is not limited to: school-based violence prevention curricula, programs aimed at mitigating the effects on children of witnessing domestic or dating violence, community campaigns designed to alter norms and values conducive to domestic or dating violence, worksite prevention programs, and training and education in parenting skills and self-esteem enhancement.

Primary Purpose Domestic Violence Service Provider

An entity that operates a project of demonstrated effectiveness carried out by a nonprofit, nongovernmental private entity, Tribe, or Tribal organization, that has as its project's primary purpose the operation of shelters and supportive services for victims of domestic violence and their dependents; or has as its project's primary purpose counseling, advocacy, or self-help services to victims of domestic violence. Territorial Domestic Violence Coalitions may include government-operated domestic violence projects as primary-purpose domestic violence service providers for complying with the membership requirement, provided that Territorial Coalitions can document providing training, technical assistance, and capacity-building of community-based and privately operated projects to provide shelter and supportive services to victims of family, domestic, or dating violence, with the intention of recruiting such projects as members once they are sustainable as primary-purpose domestic violence service providers.

Secondary Prevention

Identifying risk factors or problems that may lead to future family, domestic, or dating violence, and taking the necessary actions to eliminate the risk factors and the potential problem, including, but not limited to, healing services for children and youth who have been exposed to domestic or dating violence, home visiting programs for high-risk families, and screening programs in health care settings.

Shelter Services

The provision of temporary refuge in conjunction with supportive services in compliance with applicable State or Tribal law or regulations governing the provision, on a regular basis, of shelter, safe homes, meals, and supportive services to victims of family violence, domestic violence, or dating violence, and their dependents. State and Tribal law governing the provision of shelter and supportive services on a regular basis is interpreted by the Administration for Children and Families (ACF) to mean, for example, the laws and regulations applicable to zoning, fire safety, and other regular safety, and operational requirements, including State, Tribal, or local regulatory standards for certifying domestic violence advocates who work in shelter. This definition also includes emergency shelter and immediate shelter, which may include housing provision, rental subsidies, temporary refuge, or lodging in properties that could be individual units for families and individuals (such as apartments) in multiple locations around a local jurisdiction, Tribe/reservation, or State; such properties are not required to be owned, operated, or leased by the program. Temporary refuge includes a residential service, including shelter and off-site services such as hotel or motel vouchers or individual dwellings, which is not transitional or permanent housing, but must also provide comprehensive supportive services. The mere act of making a referral to shelter or housing shall not itself be considered provision of shelter. Should other jurisdictional laws conflict with this definition of temporary refuge, the definition which provides more expansive housing accessibility governs.

State Domestic Violence Coalition

A statewide, nongovernmental, nonprofit 501(c)(3) organization whose membership includes a majority of the primary-purpose domestic violence service providers in the state; whose board membership is representative of these primary-purpose domestic violence service providers and which may include representatives of the communities in which the services are being provided in the state; that has as its purpose to provide education, support, and technical assistance to such service providers to enable the providers to establish and maintain supportive services and to provide shelter to victims of domestic violence and their children; and that serves as an information clearinghouse, primary point of contact, and resource center on domestic violence for the state and supports the development of policies, protocols, and procedures to enhance domestic violence intervention and prevention in the state/territory.

Supportive Services

Services for adult and youth victims of family violence, domestic violence, or dating violence, and their dependents that are designed to meet the needs of such victims and their dependents for short-term, transitional, or long-term safety and recovery. Supportive services include, but are not limited to: direct and/or referral-based advocacy on behalf of victims and their dependents, counseling, case management, employment services, referrals, transportation services, legal advocacy or assistance, child care services, health, behavioral health and preventive health services, culturally and linguistically appropriate services, and other services that assist victims or their dependents in recovering from the effects of the violence. To the extent not already described in this definition, supportive services also include but are not limited to other services identified in FVPSA at [42 U.S.C. 10408\(b\)\(1\)\(A\)-\(H\)](#). Supportive services may be directly provided by grantees and/or by providing advocacy or referrals to assist victims in accessing such services.

Transportation Services

Provision of transportation; either directly or through bus passes, taxi fares, or other means of transportation.

Underserved Populations

Populations who face barriers in accessing and using victim services, including populations underserved because of geographic location, religion, sexual orientation, gender identity, racial and ethnic identity, and special needs including language barriers, disabilities, immigration status, and age. Individuals with criminal histories due to victimization and individuals with substance use disorders and mental health issues are also included in this definition. The reference to racial and ethnic populations is primarily directed toward racial and ethnic minority groups (as defined in section 1707(g) of the Public Health Service Act (42 U.S.C. 300(u-6)(g)), which means American Indians (including Alaska Natives, Eskimos, and Aleuts), Asian Americans, Native Hawaiians and other Pacific Islanders, Blacks, and Hispanics. The term “Hispanic” or “Latino” means individuals whose origin is Mexican, Puerto Rican, Cuban, Central or South American, or any other Spanish-speaking country. This underserved populations' definition also includes other population categories determined by the Secretary or the Secretary's designee to be underserved.

Victim Advocacy

Actions designed to help the victim/survivor obtain needed resources or services including employment, housing, shelter services, health care, victims' compensation, etc.

Youth Targeting Education

Presentations or trainings about domestic violence, dating violence, healthy relationships, or available services for victims. Some examples may be a presentation to youth in school on healthy relationships or a workshop for youth at a Safety Day event.

FVPSA Resources**FVPSA Guide:**

https://www.acf.hhs.gov/sites/default/files/documents/fysb/fvpsa_admin_guide_20121119_0.pdf

FVPSA Regulations:

<https://www.federalregister.gov/documents/2016/11/02/2016-26063/family-violence-prevention-and-services-programs>

HHS Grant Policy Statement:

<https://www.hhs.gov/sites/default/files/grants/grants/policies-regulations/hhsgps107.pdf>

HHS Office for Civil Rights:

<https://www.hhs.gov/civil-rights/for-individuals/index.html>

Serving LEP Victims:

<https://www.hhs.gov/civil-rights/for-individuals/special-topics/limited-english-proficiency/index.html>

Serving Immigrant Survivors of Domestic Violence:

<https://www.acf.hhs.gov/trauma-toolkit/immigrant-or-refugee-populations>

FVPSA Covid Testing, Vaccines, & Mobile Health Unit and FVPSA Support for Survivors of Sexual Assault

These supplemental FVPSA funds are intended to allow subrecipients to conduct programs and activities in response to the COVID-19 virus to support domestic violence survivors and their dependents and survivors of sexual assault.

Covid Testing, Vaccines & Mobile Health (TVMH) Funding

The purpose of these supplemental funds in the FVPSA program is to prevent, prepare for, and respond to Covid-19 with an intentional focus on increasing access to Covid-19 testing, vaccines, and mobile health units to mitigate the spread of the virus and increase supports for domestic violence survivors.

A breakdown of allowable expenses for TVMH can be found on our website here: <https://icdv.idaho.gov/wp-content/uploads/2022/02/FVPSA-Covid-TVMH-Allowable-Expenditures-List.pdf>

Sexual Assault/Rape Crisis Services & Supports (SA)

The purpose of these supplemental funds is to 1) assist with the transition to virtual/remote services for rape crisis centers, sexual assault programs, tribal programs, and culturally specific programs that provide crisis services, support services, and assistance to survivors of sexual assault, and 2) support the increased emergency needs of sexual assault survivors as a result of the Covid-19 public health emergency.

A breakdown of allowable expenses for SA can be found on our website here: <https://icdv.idaho.gov/wp-content/uploads/2022/02/FVPSA-Sexual-Assault-Allowable-Expenditures-List.pdf>

State DV Bridge Funding

The State of Idaho provided a one-time FY2022-23 allocation of State American Rescue Plan funding to support the provision of direct services to victims of crime. ICDVVA is using the same requirements for DV Bridge funds as used for VOCA in the administration of these funds. Please refer to the VOCA requirements beginning on page 10 of this manual.

Domestic Violence Project Account

The State of Idaho created the Domestic Violence Project Account. Moneys received from the fees imposed for marriage licenses, divorce filing, and protection order violations shall be credited to the account and shall be perpetually appropriated to the Council on Domestic Violence and Victim Assistance in a dedicated fund for grants for domestic violence projects and to meet the costs of maintaining the operation of the Council.

Eligible projects shall be given priority by the Council based upon an allocation of funds to projects in the seven regions in the proportion that marriage licenses are filed in each region [[Idaho Code 39-5212](#)].

Only programs that meet the ICDVVA minimum standards for domestic violence programs and personnel are eligible for these state funds.

Direct Victim Eligible Services

To be eligible for domestic violence grants pursuant to this chapter, a project must provide a safe house or refuge and a crisis line, except in the case of a project providing services to batterers. No funds may be granted to batterer programs from the domestic violence project accounts which are derived from marriage license or divorce fees. Other services which may be provided include, but are not limited to [[Idaho Code 39-5210](#)]:

- Counseling;
- Educational services for community awareness, for prevention of domestic violence and for the care, treatment, and rehabilitation of parties to domestic violence;
- Support groups; and
- Assistance in obtaining legal, medical, psychological, or vocational services.

Eligibility Requirements

The following are eligible entities for this funding pursuant to [[Idaho Code 39-5211](#)]:

- Propose to operate and provide an eligible program.
- Be a private, nonprofit corporation of the State of Idaho, or a public entity of the State of Idaho.
- Require persons employed by or volunteering services to the project to maintain the confidentiality of any information that would identify individuals served by the project.
- Provide a policy of nondiscrimination in its admissions and provision of services on the basis of race, religion, gender, color, age, marital status, national origin, disability, or ancestry.

Program Match Requirement

Those receiving State Domestic Violence Funds are required to provide a matching contribution of 25% of the total cost of each State Domestic Violence Project Grant. The match can be in-kind

or monetary [[Idaho Code 39-5211](#)]. For example, for a \$10,000 DV grant, the match would be \$10,000 x .25, or \$2,500.

- The applicant may contribute to or provide the required local matching funds.
- The value of in-kind contributions and volunteer labor from the community may be computed and included as part of the local matching requirement.
- No federal funds can be used for match.

Match Documentation

Subrecipients must maintain records that clearly show the source, the amount, and the period during which the match was allocated. The basis for determining the value of personal service, materials, equipment, and space must be documented. Volunteer services must be documented utilizing timesheets and a supervisor's signature. Match documentation must be submitted with the quarterly financial reports.

All matching contributions must be:

- Verifiable from the applicant's records.
- Not included as a contribution for any federal funds.
- Necessary and reasonable to accomplish the project's goals.
- Allowable charges.
- Not paid by the applicant from federal funds received under another agreement, or from any grant administered by ICDVVA.
- Included in the budget approved by ICDVVA.
- In accordance with all other state and federal requirements.

Fiscal Administration for Subrecipients

Reimbursement Requests

Cost & Billing Procedure

All ICDVVA grants will be reimbursed on a cash basis to include only expenses paid during the request period. Expenses charged to this subgrant must be reasonable and allowable under the appropriate funding source. Expenses that are charged to the subgrant must be included in the final signed budget. ICDVVA reserves discretion over final determination of allowable expenditures.

Any adjustment to the final signed budget must be pre-approved by ICDVVA, supported with documentation, and in writing.

All requests for reimbursement shall be accompanied by documentation of expenditures (i.e., invoices, checks, payroll ledgers, pay stubs, and other relevant supporting documents). All requests must be allowable under ICDVVA guidelines. Please review the complete requirements in the ICDVVA subrecipient reimbursement request policy at <https://icdv.idaho.gov/grantees/policies-and-procedures/>.

Requests for reimbursement shall not exceed thirty (30) calendar days from the end of the reimbursement period. Requests submitted after this deadline will not be processed absent exceptional circumstances (if there is an exceptional circumstance, it must be communicated to the grant manager *before* the reimbursement is late). If the period exceeds thirty (30) calendar days, it will be viewed as a non-compliance issue. ICDVVA reserves the right to deny reimbursement.

ICDVVA retains the right to refuse reimbursement and reserves the right to determine reasonableness of an expense.

- Reimbursement of expenses by ICDVVA shall be made upon submission of mandatory forms supplied by ICDVVA.
- Programs are expected to work with ICDVVA towards the end of a grant period to reallocate any funds which cannot be spent and collaborate to ensure that
- The Subrecipient understands that any unspent funds remaining at the end of a grant period will be reverted and retained by ICDVVA.

All requests for reimbursement must be emailed to: info@icdv.idaho.gov
Subject Line: [Program Name] [Draw Number]

The supporting documentation may be emailed with the request, or if the file size would require multiple emails, please reach out to your Grants Manager for access to an uplink/file share solution. If you upload your reimbursement supporting documents, you still need to send an email as outlined above. That email is the record of when you submitted the reimbursement request. In the email, indicate that you are uploading documents to support the request and ICDVVA will then go review and download them as part of processing the reimbursement request. (We *do not* get notification that there has been an upload unless you email as directed).

Description of Budget Categories

Administrative Services

All administrative costs must go in this category. The costs of applying for a grant from ICDVVA are not reimbursable. Benefits follow the employee. Do not include benefits for direct services personnel in this section. If you will be requesting ICDVVA funds for administrative costs, please be aware of the following: For both VOCA awards and Family Violence awards, you can use up to five percent (5%) of your award for administrative costs. Please keep this in mind as you prepare your budgets. Please prorate the cost associated with these positions among all funding sources. Only request funding levels for the positions that are directly attributable to ICDVVA grants.

Indirect Services

Though not direct victim services, these activities are often necessary to ensure that quality direct services are provided. Before these costs can be supported with ICDVVA funds, these costs must be approved by ICDVVA. ICDVVA and the grantee must agree that: (1) direct services to the crime

victim cannot be offered without ICDVVA support of these expenses; (2) the Grantee has no other source of support for them; and (3) only a limited amount of ICDVVA funds will be used for these purposes. At least 60% of every award must fund direct services.

Operating Costs

Outlined below are examples of operating costs. This is not an exhaustive list.

Skills Training for Staff

ICDVVA Funds designated for training are to be used exclusively for developing the skills of direct service providers, including paid staff and volunteers, so they can offer quality services to crime victims. (VOCA funds can be used for training both VOCA-funded and non-VOCA-funded service providers who work within a VOCA recipient organization.) ICDVVA funds cannot be used for management and administrative training of Executive Directors, Board Members, and other individuals who do not provide direct services.

Idaho Safety & Resilience Conference

ICDVVA presents a training conference on crime victim assistance each year. Attendance is not mandatory, but highly recommended.

Supplemental Conferences

Grantees may utilize limited funds to attend training that improves skills and victim services. Attending staff are expected to share what they learn with other program staff.

Training Materials

ICDVVA funds can be used to purchase materials, such as books, training manuals, and videos for direct service providers, and can support the costs of a trainer for in-service staff development. Programs are asked to share training opportunities with other programs and providers when possible, to maximize the use of limited training funds.

Equipment and Furniture

ICDVVA requires preapproval of individual purchases over \$500 via an asset acquisition form. The request must be directly related to the provision of victim services. ICDVVA funds may be used to buy furniture and equipment that provide or enhance direct services to crime victims. ICDVVA cannot support the entire cost of an item that is not used exclusively for victim related activities but can support a prorated share of such an item. A detailed description of the furniture or equipment item to be purchased must be provided. Examples of allowable costs may include: computers, recording equipment for interviewing children, two-way mirrors, and equipment and furniture for shelters, workspaces, victim waiting rooms, and children's play areas.

Advanced Technologies

This includes use of funds for internet connections for submission of the ICDVVA required reports.

Repairs or Replacement of Essential Items

Preapproval is required via submission of the Repair/Replacement Form for repairs exceeding \$500.

Direct Victim Services: Staff, Salaries, and Benefits

This includes any employee of the program who would be involved in direct victim services. These costs DO NOT include payments for administrative services. If your program serves recipients not designated as victims or secondary victims or provides services that are ineligible for reimbursement, pro-rate these wages/salaries based on the amount of time providing eligible services. Accurate time and attendance records must be maintained for each position budgeted under this grant. Benefits follow the employee.

Change Request Forms

ICDVVA understands that through the course of a grant cycle, there will be programmatic, financial, and personnel changes among subrecipients. The following forms are available to notify ICDVVA Grant Managers of substantive changes in subrecipient grants.

The following require an adjustment form:

- Budget Adjustment Requests
- Grant Adjustment Requests

The following require a preapproval form:

- Asset Acquisition Requests
- Training/Travel Requests
- Repair/Replacement Requests

Grant Adjustment Requests

The purpose of the [Grant Adjustment Request](#) is to alert ICDVVA about any of the following changes to your grant:

- A change in the agency Executive Director;
- A change in the agency Project Director;
- Changes in program scope or activities.

Budget Adjustment Requests

The purpose of the Budget Adjustment Request is to receive prior approval from ICDVVA to any changes from the final signed budget. The Budget Adjustment must be approved by ICDVVA in writing prior to expending the adjusted funds. Without prior approval, the expense will be deemed unallowable and not reimbursed. All changes to budgets must be pertinent to the original project scope. All Budget Adjustment Requests must be submitted thirty (30) days prior to the end of the grant period.

Budget Adjustment Request Form

The Budget Adjustment Request form is available in the Grant Administration Workbook provided by your Grant Manager. Please contact your Grant Manager directly for questions on completing and submitting the form.

Asset Acquisition Requests

All requests for furniture, equipment, and advanced technologies in an amount over \$500.00 must be preapproved in writing by ICDVVA prior to purchase. Without prior approval, the expense will be deemed unallowable and not reimbursed. Follow the link for the [Asset Acquisition Request](#) form.

Training/Travel Requests

All requests for training and training-related travel in an amount over \$500.00 must be preapproved in writing by ICDVVA prior to incurring expenses (as a total for all participating employees). Without prior approval, the expense will be deemed unallowable and not reimbursed. Follow the link for the [Training/Travel Request](#) form.

Repair/Replacement Requests

All requests for repairs and replacements in an amount over \$500.00 must be preapproved in writing by ICDVVA prior to purchase. Without prior approval, the expense will be deemed unallowable and not reimbursed. Follow the link for the [Repair/Replacement Request](#) form.

Reporting

Performance Measurement Data Reporting

If your agency has multiple grants and receives funding to provide direct victim services through VOCA and FVPSA, you must report data for each program separately. Please be sure that whichever data collection method you use is accurately tracking the clients you serve with your VOCA and FVPSA grant funds separately.

VOCA subrecipients may utilize the VOCA tracking spreadsheet available at: <https://icdv.idaho.gov/grantees/forms-and-reporting/>. The exception to utilizing this form is if subrecipients already utilize an electronic tracking system programmed to capture VOCA required data. Subrecipients must inform the Research Analyst of the electronic tracking system they are using.

In FY23 subrecipients will be responsible for entering their own quarterly VOCA data in the PMT. [VOCA Performance Measures, Subrecipient Quarterly Performance Report](https://oipssso.ojp.gov/)
<https://oipssso.ojp.gov/>

FVPSA Data must be submitted every quarter using Jotform.

[Family Violence Prevention & Services Act \(FVPSA\) Quarterly Performance Report](#)

FVPSA TVMH Data must be submitted every quarter using Jotform.

[Family Violence Prevention & Services \(FVPSA\) TVMH/SA Quarterly Performance Progress Report](#)

FVPSA SA Data must be submitted every quarter using Jotform.

[Family Violence Prevention & Services \(FVPSA\) TVMH/SA Quarterly Performance Progress Report](#)

[State DV Bridge funding must be submitted every quarter using Jotform.](#)

[State DV Bridge Quarterly Performance Progress Report using Jotform.](#)

Dates for submitting VOCA, FVPSA, FVPSA TVMH, FVPSA SA, and State DV Bridge Quarterly Performance Measurement Reports are as follows. Please add these to your agency's calendar:

Quarter	Q1: October–December	Q2: December–March	Q3: April–June	Q4: July–September
Report Period Ending	December 31	March 31	June 30	September 30
Report Due Date	January 15	April 15	July 15	October 15

Delays in submitting programmatic reports can cause ICDVVA to be late in its reporting requirements to our federal partners. Therefore, ICDVVA takes timeliness in programmatic reports very seriously. Late reports are a non-compliance issue, may result in withholding funds and are factored into risk assessment scores. We appreciate your cooperation!

Program Outcomes Reports

Each subrecipient stated in their application how their activities would support ICDVVA's Strategic Plan. Twice a year, on April 15 and November 15, each subrecipient will submit a report documenting their progress in fulfilling these goals. Reports are due twice per year and should include what the program put on the FY23 application for how the ICDVVA strategic plan would be furthered by ICDVVA funding and a brief description of how that has or not happened during the reporting period:

Reporting Period	October 1–March 31	April 1–September 30
Report Due Date	April 15	November 15

Continuing Education Reporting

Grantees must maintain Continuing Education records for all funded employees. These records will be submitted to ICDVVA as part of monitoring and can be requested at any time if needed for audit purposes. Records should be kept per employee with the following information: topic,

date, duration, location, and training provider. Funded employees are required to complete at least 20 hours of Continuing Education per year.

Compliance Monitoring Activities

The goal of monitoring activities is to ensure services for Idaho survivors of crime are delivered with integrity and in accordance with grant regulations. Subrecipients must maintain accurate, current, and complete client, administrative, and fiscal records, including accurate records of receipt, obligation, and disbursement of funds. Records must be accessible to authorized state officials during normal operating hours for purposes of inspection and/or audit, with or without prior notification, pursuant to [Section 39-108](#), Idaho Code. Subrecipients will be required to participate in onsite or remote monitoring to ensure compliance with all ICDVVA applicable rules and regulations.

Compliance monitoring of ICDVVA subrecipients will occur at least every two years. Events that may precipitate more frequent monitoring include but are not limited to:

- Change in leadership or key funded staff
- Complaints of waste, fraud, or abuse
- Complaints from clients
- Complaints from subrecipient board
- Uniformly inaccurate or change in quality of reimbursement requests

Monitoring Standards & Procedures

Standards for Programmatic Monitoring include, but are not limited to:

- Policies and procedures governing program services
- Office of Civil Rights requirements
- Current certifications and licensure as necessary
- Current Employer Liability and Workers Compensation Insurance
- Other such programmatic materials as ICDVVA staff may request
- Review of all programmatic reporting for the review period
- Interview with subrecipient staff
- Review of personnel policy & procedures
- For FY23, subrecipients will be required to have a succession plan in place for the Executive Director position and any other position essential to the operation of the organization

Standards for Financial Monitoring include, but are not limited to:

- Assessment of submitted documentation from subrecipient. Documentation includes, but is not limited to:
 - Expense Ledger
 - Personnel documentation (timesheets, payroll remittance, benefits, etc.)
 - Receipts and cancelled checks for purchases

- Mileage logs
- Travel receipts
- Documentation of value of donated goods/materials/items
- Equipment log / property records for items purchased with grant funds
- Other such financial documentation as ICDVVA staff may request
- Review of all financial reporting for the review period
- Interview with subrecipient staff

Procedures for both onsite and remote monitoring are as follows:

- Subrecipients will be notified of the scheduled monitoring via email no less than thirty (30) calendar days prior to the scheduled monitoring meeting. Subrecipients will receive a documents checklist and pre-review workbook with the notification.
- All requested documents and the pre-review workbook must be submitted to ICDVVA in advance of the scheduled monitoring by a date determined by the Grant Manager.
- The Grant Manager reviews all documents and the pre-review workbook prior to the monitoring meeting.
- During the meeting, the Grant Manager will interview the subgrantee's designated grant project director and any grant project staff for additional information/clarifications on monitoring documents.
- Following the meeting, subrecipients will receive an ICDVVA Monitoring Report which includes any findings, concerns, or recommendations and due dates for specific items that require corrective action.
- Subrecipients must review the Monitoring Report, include a corrective action plan if required, sign, and return the Monitoring Report to ICDVVA.
- Subrecipients must resolve all corrective action items to the satisfaction of ICDVVA within established deadlines.
- ICDVVA will issue a letter of monitoring completion upon satisfactory resolution of all corrective action items.

Policy Development for Subrecipients

ICDVVA requires subrecipients to develop, adopt, and maintain operational, personnel, and fiscal policies to ensure quality of services. The governing board is responsible for reviewing, revising, and approving policies of the program. All approved policies and manuals should include the date approved.

The following information is a list of topic areas and information to consider when developing policies. Generally, policies exist to provide guidance to agency employees in performing their jobs. Well-written policies are fundamental to administrative and operational aspects of a program and to enhance workplace safety and quality. Policies are subject to change with appropriate notice as conditions may warrant. Governing boards have a responsibility to ensure policies are legal, current, and appropriate. Review of policies by each organization's board should be conducted and documented annually.

- Mission statement
- Services
- Policy review and revision
- Governing body bylaws
- Conflict of interest
- Equal employment opportunity plan
- Non-discrimination in service provision
- Limited English proficiency
- Federal civil rights law training
- Complaint filing procedures
- Drug-free workplace
- Violence-free workplace
- ADA/Accessibility for clients as well as employees
- Lobbying
- Sexual harassment
- Confidentiality
- Breach of personally identifiable information
- Storage and maintenance of personnel, volunteer, and client files
- Mandatory reporting
- Service eligibility
- Crisis intervention services
- Services documentation
- Services evaluation
- Safety
- Transportation
- Children services
- Shelter services policies
- Eligibility for shelter services
- Shelter health and safety
- Shelter locations
- Length of stay
- Shelter intake
- Shelter children services
- Termination of services
- Personnel and volunteer policies
- Orientation
- Staff development
- Temporary assignment
- Ethical behavior
- Problem solving
- Evaluation

- Grievance
- Dismissal
- Background checks
- Volunteer recruitment and selection
- Volunteer management
- Training requirements
- Compassion fatigue & vicarious trauma
- Trauma informed response
- Discourage texting while driving
- Fiscal policies
- Internal controls and separation of financial duties
- Salaries and benefits for paid and unpaid staff
- Travel
- Gift cards
- Staff cell phone reimbursement
- Medical Advocacy
- Court Advocacy

ICDVVA maintains a resource library for funded programs to see sample policies from other programs which have agreed to share them. Consult your grant manager for access to the resource library.

Federal Civil Rights (Non-discrimination Policy)

As recipients of federal funds, all subrecipients are subject to the following federal non-discrimination laws:

- **Victims of Crime Act (VOCA) of 1984**, as amended, 34 U.S.C. § 20110(e) and the regulation implementing the Victim of Crime Act Victim Assistance Program, 28 C.F.R. § 94.114 (prohibiting discrimination in programs funded under the statute, both in employment and in the delivery of services or benefits, based on race, color, national origin, sex, religion, and disability);
- **Title VI of the Civil Rights Act of 1964**, which prohibits discrimination on the basis of race, color, and national origin in the delivery of services (42 U.S.C § 2000d), and the DOJ implementing regulation at 28 C.F.R. Part 42, Subpart C;
- **Section 504 of the Rehabilitation Act of 1973**, which prohibits discrimination on the basis of disability in the delivery of services and employment practices (29 U.S.C. § 794) and the DOJ implementing regulation at 28 C.F.R. Part 42, Subpart G;
- **Title II of the Americans with Disabilities Act of 1990**, which prohibits discrimination on the basis of disability in the delivery of services and employment practices (42 U.S.C. § 12132) and the DOJ implementing regulation at 28 C.F.R. Part 35;

- **Title IX of the Education Amendments of 1972**, which prohibits discrimination on the basis of sex in education programs and activities (20 U.S.C. § 1681), and the DOJ implementing regulation at 28 C.F.R. Part 54;
- **The Age Discrimination Act of 1975**, which prohibits discrimination on the basis of age in the delivery of services (42 U.S.C. § 6102), and the DOJ implementing regulation at 28 C.F.R. Part 42, Subpart I; and
- **The DOJ regulation on the Partnerships with Faith-Based and Other Neighborhood Organizations**, which prohibits discrimination on the basis of religion in the delivery of services and prohibits organizations from using DOJ federal financial assistance for explicitly religious activities (28 C.F.R. Part 38).

Information about these laws can be found on the U.S. Department of Justice, Office of Justice Programs, Office for Civil Rights [website](#). Generally, to be compliant with these laws, subrecipients may not discriminate on the basis of sex, national origin, immigration status, religion, race, color, disability status, or age when providing services.

To ensure your agency is providing the best possible services to all persons in your community, you should have a non-discrimination policy for service provision and disseminate the policy to all organization employees and clients seeking your services.

Clients who feel they have been discriminated against may file a complaint with ICDVVA or the Office of Civil Rights. If a finding of discrimination is made against your agency, you must file these findings with the Office of Civil Rights and send a copy to ICDVVA. The ICDVVA Complaint Procedure and Complaint form are available on the ICDVVA [website](#).

Office of Justice Programs Civil Rights Training

Subrecipient Executive Directors must complete the Office of Justice Programs Civil Rights Training at least every three (3) years. A link to the online training curriculum and Civil Rights Training Certification Form is available on the ICDVVA [website](#).

Limited English Proficiency (LEP)

Finally, all subrecipients must be prepared to make reasonable accommodations for persons seeking services who either have Limited English Proficiency (LEP) or have a disability to be compliant with the above non-discrimination laws. For information and resources for providing services to LEP or disabled individuals, visit [LEP.gov](#).

Useful Websites/Resources

Please note that this is not a comprehensive listing and there may be other sites available for Best Practices and Technical Assistance. ICDVVA has established a [resource library](#) with forms, policies, and other helpful information for funded programs. Subrecipients are encouraged to

work with their Grant Manager to share information through the resource library.

Idaho Programs:

[VINE Program](#)

[Idaho Crime Victims Compensation Program](#)

[Idaho Coalition Against Domestic and Sexual Violence](#)

[Idaho Department of Health and Welfare](#)

[Idaho Council on Developmental Disabilities](#)

[List of Idaho Programs](#)

National Resources:

Family Violence Prevention & Service ([FVPSA](#))

Office for Victims of Crime, Training and Technical Assistance Center ([OVCTTAC](#))

National Center for Victims of Crime ([NCVC](#))

[National Children's Alliance](#)

National Coalition Against Domestic Violence ([NCADV](#))

National Network to End Domestic Violence ([NNEDV](#))

National Sexual Violence Resource Center ([NSRVC](#))

[National Stalking Resource Center](#)

Office for Victims of Crime ([OVC](#))

Rape, Abuse, Incest, National Network ([RAINN](#))

[Identity Theft Resource Center](#)

Additional Civil Rights Resources:

[Model Policies for Limited English Proficiency \(LEP\)](#)

[LGBTQ Meaningful Access and Non-Discrimination](#)



Subrecipient Risk Assessment

Subrecipient Organization:	
Agreement #:	
Date of Risk Assessment:	
Total FY22 VOCA Award:	
Total FY22 FVPSA Award:	
Total FY22 State DV Award:	

Overall Assessment Key

High Risk = 19 - 36

Medium Risk = 10 - 18

Low Risk = 0 - 9

Criteria	Score (0-2)
Attendance at Required Meetings and Trainings	
Monitoring Time Frame	
Monitoring Findings	
Monitoring Concerns	
Data Reports - Timeliness and Accuracy	
Staff Turnover	
Years of ICDVVA Funding	
Years Experience with Other Federal Grants	
ICDVVA Award Amount	
Percentage of Subrecipient Budget/Reliance on ICDVVA	
Match Reports - Timeliness and Accuracy	
Budget Adjustments (Frequency)	
Unspent Funds at End of Grant Year	
Audit	
Audit Findings/Questioned Costs	
Reimbursement Requests - Timeliness	
Reimbursement Requests - Accuracy	
Pre-Approval Request Forms When Required	
TOTAL	0

The signature below signifies this Risk Assessment has been completed by an ICDVVA Grant Manager:

Grant Manager, ICDVVA	Date

The signature below signifies this Risk Assessment has been reviewed by the ICDVVA Grants Supervisor:

Dana Wiemiller, Grants Supervisor, ICDVVA	Date

The signature below signifies this Risk Assessment has been reviewed by the ICDVVA Executive Director:

Heather A. Cunningham, Executive Director, ICDVVA	Date

APPENDIX A: 2022 RISK ASSESSMENT FORM P.2

Key to Risk Assessment Scoring						
Attendance at Required Meetings and Trainings	0	Subrecipient attended all required meetings, trainings or events	1	Subrecipient missed one required meeting, training, or event	2	Subrecipient missed more than one required meeting, training, or event
Monitoring Time Frame	0	Monitored in the last year	1	Monitored in the last 2 years	2	Not monitored in the last 2 years OR new subrecipient
Monitoring Findings	0	0-2 Findings at most recent Monitoring	1	3-4 Findings at most recent Monitoring	2	5+ Findings at most recent Monitoring
Monitoring Concerns	0	0-2 Concerns at most recent Monitoring	1	3-4 Concerns at most recent Monitoring	2	5+ Concerns at most recent Monitoring
Data Reports - Timeliness and Accuracy	0	Reports are consistently submitted accurately and in a timely manner	1	1 quarter of reporting was submitted late and/or with minor errors	2	2+ quarters of reporting were submitted late and/or with significant errors. Late SAR submission.
Staff Turnover	0	No staff turnover in key funded positions within the past year			2	Change in agency leadership and/or change/vacancy in two or more key funded positions
Years of ICDVVA Funding	0	3 or more years	1	1-2 years	2	New Subrecipient
Years Experience with Other Federal Grants (new subrecipients only; continuing subrecipients score = 0)	0	4 or more years (all continuing subrecipients score 0)	1	1-2 years	2	None
ICDVVA Award Amount	0	Less than \$150,000	1	\$150,001-\$300,000	2	\$300,001 or more
Percentage of Subrecipient Budget/Reliance on ICDVVA	0	This grant comprises less than 25% of total subrecipient operating budget	1	This grant comprises between 25-50% of total subrecipient operating budget	2	This grant comprises more than 50% of total subrecipient operating budget
Match Reports - Timeliness and Accuracy	0	Quarterly match reports are consistently submitted accurately and in a timely manner	1	1 quarter of match reporting was submitted late and/or with minor errors	2	2+ quarters of match reporting were submitted late and/or with errors
Budget Adjustments (Frequency)	0	0-3 budget modifications requested	1	4-5 budget modifications requested	2	6+ budget modifications requested
Unspent Funds at End of Grant Year	0	All funds were expended	1	90%-99% of award was expended	2	Less than 90% of award was expended
Audit	0	Audit completed in last 12 months			2	No audit completed in last 12 months
Audit Findings/Questioned Costs	0	No audit findings or questioned costs			2	Audit findings or questioned costs
Reimbursement Requests - Timeliness (45 days from end of e	0	No late submissions	1	1 late submission	2	2+ late submissions
Reimbursement Requests - Accuracy	0	Reimbursement requests require few or no revisions	1	Reimbursement requests require occasional revisions	2	Reimbursement requests require frequent revisions
Pre-Approval Request Forms When Required	0	Pre-approval forms always used when required	1	1-2 instances of requesting item without required pre-approval form	2	3+ instances of requesting item without required pre-approval form

Assessment Definitions

High Risk	A subrecipient with an overall risk assessment score of 19-36 will be considered High Risk. High Risk subrecipients must be monitored at least annually. Full documentation must be provided for every reimbursement request, as well as any additional items the grants manager considers necessary to verify the request. These requirements may exceed what other agencies are asked to provide. High risk agencies may be paired in a voluntary mentorship with a similar funded program for assistance, may be required to attend training on specific issues, and may be subject to drop-in visits or spot checks by ICDVVA. Monitoring for high-risk agencies should be conducted onsite and in person if possible given ICDVVA's capacity, schedule, and other criteria. An audit may be required.
Medium Risk	A subrecipient with an overall risk assessment score of 10-18 will be considered Medium Risk. Medium Risk subrecipients may be monitored annually rather than every other year, subject to the capacity of ICDVVA to conduct the required number of monitoring visits for the year. When feasible, monitoring for Medium Risk agencies should be conducted onsite and in person but may also be conducted remotely.
Low Risk	A subrecipient with an overall risk assessment score of 9 or less will be considered Low Risk. Low risk subrecipients need only be monitored every other year. While onsite and in-person monitoring is always preferred, Low Risk subrecipients can be monitored remotely.