



## VOCA Match Waiver Policy & Procedure

Effective: March 2020

### Introduction

Effective July 01, 2019, The Office of Victims of Crime (OVC) will no longer require OVC prior approval of VOCA subrecipient full or partial match waivers. VOCA match waivers will be approved by the State Administering Agency, the Idaho Council on Domestic Violence and Victim Assistance (“Council”). The Council has developed policy and procedure to be used as a guide for approving VOCA match waivers. If this policy changes, the Council will submit the revised policy to OVC within 30 calendar days of the changes to this policy and will obtain OVC approval prior to making a waiver determination pursuant to the revised policy.

VOCA recipients are required to provide a 20% match share of the overall requested budget (28 CFR 94.118) unless a Waiver of Match has been approved. Match requirements may be waived for programs that can provide documentation of need as outlined in 28 CFR 94.118(b)(3) of the VOCA Victim Assistance Final Program Guidelines.

Determining need for a waiver typically considers factors such as:

- Local Resources;
- Annual Budget Changes;
- Past Ability to Provide Match;
- Whether the funding is for new or additional activities requiring additional match versus continuing activities where match is already provided; and
- Extenuating circumstances such as a natural disaster, public health crisis, or other extreme circumstance that is out of the subrecipient’s control.

Match requirements are automatically waived for subrecipients that are federally recognized American Indian or Alaska Native tribes, or projects that operate on tribal lands.

Projects funded in previous project periods are expected to provide the same level of match as in the previous project period.

Waiver of Match Request Overview:

- If requesting a full or partial waiver of VOCA match, the program’s Project Point of Contact must submit a Waiver of Match Request letter for Council approval:
  - With the grant application; or
  - After the project start date, up to 31 calendar days before the subaward project end date.

- If requesting a full or partial waiver of VOCA match after 30 calendar days before the subaward project end date, the Project Point of Contact must submit a Waiver of Match Request letter to the Council for submission to OVC for approval determination.
- The Executive Director will consult with the OVC program manager regarding any match waiver requests involving unique circumstances.

Waiver of Match Request Letter must include the following information:

- 1) Type-written on the program's agency letterhead, addressed, and sent to the assigned Council Grant Manager;
- 2) Explain why the waiver is necessary/clarify the need for increased funding;
- 3) Clearly indicate/describe the hardship and/or type of circumstances that will hinder the program's ability to provide the required level of match;
- 4) Outline the issues related to the project's lack of resources (i.e. volunteers, other funding, in-kind donations);
- 5) Address what methods the organization has used to consider all possible options for meeting the match requirements;
- 6) Address if a match waiver is approved, does the organization anticipate this is a one-time request, or are there extenuating circumstances that will require a waiver request next year;
- 7) Explain how the denial of a match waiver would impact the VOCA project;
- 8) Advise whether the program would have to decline all or part of the grant award if a match waiver is not granted;
- 9) Outline what steps the organization plans to take in order to be able to meet the match requirement in the future; AND
- 10) Signature of the Project Point of Contact and the Authorized Official.

Final Determination Review of Waiver of Match Request:

- 1) Once received, the Waiver of Match Request letter will be reviewed by the Grant Manager for inclusion of the above criteria and forwarded with approval or denial recommendations to the Director of Federal Grants and Programs within 10 business days from receiving the waiver request.
- 2) The Grant Manager, in determining recommendations, should consider:
  - How is the grant currently being matched? Consider past ability to provide match. (NOTE – OVC generally expects subrecipients to provide at least the same dollar amount of match it provided during the grant year immediately preceding the year of the waiver request unless changes in circumstances justify a lower amount.)
  - What circumstances exist that impede the organization's ability to partially or fully match the VOCA grant funds requested? (i.e., local resource restraints of a rural community with limited local funding availability or volunteer capacity)
  - What are the practical and/or logical obstacles to providing match (i.e., public agencies that do not engage in private fundraising and may have limitations on soliciting contributions).
  - Has there been an increase to the VOCA funding where local funding availability has not increased to the same degree?
  - Has the organization considered all possible options for meeting the match with in-kind and cash sources that are not being used as match on another federal grant? If so, what

methods has the organization used to consider all possible options for meeting the match requirements?

- What steps does the organization plan to take in order to be able to meet the match requirement in the future?
  - If a match waiver is approved, does the organization anticipate this is a one-time request or are there circumstances that will require a waiver request next year?
  - How would the denial of a match waiver impact the VOCA project?
  - Would the program have to decline all or part of the grant award if a match waiver is not granted?
3. Utilizing the VOCA Match Waiver Final Determination Form, the Grant Manager will draft recommendations that outline:
    - Program information including a brief description of the project/services provided by the applicant;
    - Justification for Approval or Denial of the waiver; and
    - The scope of the waiver including the waiver dollar and percentage amount.
    - NOTE – though a dollar amount is calculated, the Grant Manager’s actual Recommended Match Waiver is a percentage of the applicant’s total project cost. Upon award, the Approved Match Waiver is a fixed percentage that will be applied should the project budget change.
  4. The Executive Director will consider the applicant’s Waiver of Match Request letter and the Grant Manager’s recommendations to make an official final determination by signing the VOCA Match Waiver Final Determination Form within 10 business days of receipt.
  5. The Executive Director will advise the Grant Manager of the final determination of denial or approval.
  6. No later than 3 business days after final determination, the Grant Manager will email the signed form to the program’s Project Point of Contact & Authorized Official to review the VOCA Match Waiver Final Determination Form.
  7. Match Waiver Determination Letter will outline:
    - A brief description of the project/services provided by the applicant;
    - Justification for Approval or Denial of the waiver - state affirmatively that the Council approves or denies the waiver request and why; and
    - The scope of the waiver including the waiver dollar and percentage amount.
    - NOTE – though a dollar amount is calculated, the Grant Manager’s actual Approved Match Waiver is a percentage of the applicant’s total project cost. Upon award, the Approved Match Waiver is a fixed percentage that will be applied should the project budget change.
  8. Match Waiver Requests submitted 31 calendar days prior to the project end date or after will be submitted to OVC for prior approval by following the same procedure as above. However, approval or denial will not be communicated to the requesting program until OVC has decided.
  9. The Executive Director or designee will submit each approved match waiver determination to OVC (via GAN, or as otherwise specified by OVC) within 30 calendar days after approval.
  10. The Executive Director and Programs or designee will submit to OVC the match waiver spreadsheet, using the OVC template, showing all active waivers approved in a federal fiscal year, by no later than 90 calendar days after the fiscal year end.

## VOCA Match Waiver Final Determination Form

Subrecipient Name:

Fiscal Year:

Subrecipient Award Amount:

Required VOCA Match Amount:

Grant Manager:

Date:

1. Project Description:
2. Recommendation:
  - Approve
  - Deny
3. Justification for approval or denial of the waiver:
4. Indicate scope of the waiver. Include the waiver dollar and percentage amount:

Grant Manager Signature:

Date:

Executive Director Signature:

Date: