

**IOWA DEPARTMENT OF JUSTICE**

**ATTORNEY GENERAL  
BRENN A BIRD**



## Chapter 1 Pre Award Requirements

The Victim Assistance Section of the Iowa Attorney General's Office typically awards funds on a three year grant cycle (Oct 1-Sept 30 of each year). A request for proposals is typically released roughly one year in advance of the start of the new three year grant cycle. This chapter outlines the processes and requirements to obtain victim assistance grant funds.

# Grant Application and Allocation Overview

[Funding Timeline](#)

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## Funding Timeline

The Victim Assistance Section of the Iowa Attorney General's Office provides funding to organizations which provide services to victims of crime.

The application and funding process is approved by the Crime Victim Assistance Board. The Victim Assistance Section awards funding on a three-year cycle for victim service applicants and criminal justice programs. The funding cycle begins on October 1 of the first year and ends September 30 of the third year.

The application process begins with the release of a Request for Proposals (RFP) and typically includes the application, application instructions and a technical assistance workshop detailing how to apply for funding. Application workshops are conducted either in-person or via webinar. The workshop clarifies funding application requirements and the award process. The grant cycle process outlined below provides a general application timeline. The grant application and review timeline may change based on the funding initiative. It is highly recommended that applicants read open grant opportunities for specific details on timelines and conditions. The process typically includes:

- Funding application workshops
- Letters of intent due (if requested)
- Applications due
- Application review
- Crime Victim Assistance Board approves recommended awards
- Award notifications emailed to applicants
- Appeals submitted for reconsideration
- Crime Victim Assistance Board reviews appeals for funding
- Contracts are issued to successful applicants

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## Request for Proposal Process

Iowa Administrative Rule (61-9.53 (13) states: in any year in which federal or state funds are available, the Crime Victim Assistance Division (CVAD) (now named Victim Assistance Section) shall administer grants with eligible applicants. The amount of funds awarded shall be contingent upon the funds available. Victim Assistance shall announce the opening of an application period via public notice including but not limited to notice to current grantees and other eligible agencies identified by the program and posting on the [Attorney General's office website](#).

Applications must be received by 4:30 CST on the designated due date.

The available grant funding opportunities/RFP will contain information regarding:

- Purpose of the Funding Opportunity
- Project Period
- Eligibility Requirements
- Service Delivery Area
- Available Funds
- Application Overview including Application Deadline, Contract Period, Important Dates
- Grant Review Process
- Match Requirements (if applicable)

Proposals are reviewed and evaluated by a grant/application review committee and Victim staff. The review committee includes persons with expertise in victim services, grant management, public policy or other related areas.

The Victim Assistance staff submit funding recommendations from both the external and internal reviewers to the Crime Victim Assistance Board. The Board determines final grant awards to the extent funds are available and to the extent the applicants meet eligibility criteria.

## Types of Applications and Grants

The Victim Assistance Section of the Iowa Attorney General's office provides funding to organizations who provide services to victims of crime. Per Administrative Rule 9.53(1) and (2), there are two types of grants (applications) available:

**Competitive grants** will be awarded based on the availability of funds, history and demonstration of quality of services provided, compliance with the requirements of the division, number of victims served, or cases investigated and prosecuted, population served, and geographical distribution of funds in the state. Preference shall be given to continued funding of successful grantees. [Administrative Rule 9.53(1)]

**Focus grants** will be awarded at the discretion of the AG's Office. Focus grant funding must comply with all applicable state and federal rules and regulations. The total of focus grants from one funding source may not exceed 3 percent of the funds available from the funding source in one state fiscal year. [Administrative Rule 9.53(2)]

Focus grants are awarded sparingly as the AG's Office favors an open, competitive, fair process in distributing the funds. Applicants wishing to apply for a focus grant should review the requirements in **Application Review Process for Focus Grant Applications** below.

## Notification of Availability of Funding

The AG's Office shall announce the opening of an application period through public notice including but not limited to notice to current grantees and other eligible agencies identified by the program and posting on the Attorney General's Office website. Applications must be received by the designated due date. [Per Administrative Rule 61-9.53(13)].

## Letters of Intent to Apply

If required by the funding solicitation, an applicant must submit a letter of intent to apply for a grant. Letters of intent to apply for funding will not increase the chances of being selected for funding. Letters of intent allow staff to plan the grant review process. Applicants must be registered with [Iowa Grants for Victim Services](#), grant management system. If a letter of intent is required detailed instructions will be provided in the RFP.

Applicants who apply for grant funding should be aware of the requirements and be willing to adhere to the certified assurances as set forth by internal and federal funding sources.

## Application for Funding

Each complete application must be submitted in the manner requested, by 4:30 pm CST on the due date. The application packet shall be made available upon request to all interested parties.

An applicant must have the following:

- Table of organization and articles of incorporation as required [Administrative Rule 61-(9.54(2))]
- Evidence of any insurance coverage the applicant carries for liability or property. [Administrative Rule 61-(9.54(3))]
- Unique entity identifier, which replaces the federal DUNS number. You can learn more about obtaining a unique entity identifier on the [GSA website](#).

Victim Assistance may allow combined applications from two or more agencies if a combined application will encourage cooperation between those agencies on behalf of crime victims. Each agency receiving funds under a combined application shall sign a grant contract for the use of awarded funds. [Administrative Rule 61-(9.54(4)]. Please contact the [VSS Administrator](#) with questions about this rule.

**Applications should include the following** [Administrative Rule 61-9.54 (13)(1-2)]:

A paragraph describing the agencies or units of government requesting the funds.

A description of services for which funding is being requested. The description shall include, but not be limited to, the following:

- a. The geographical area to be served.
- b. The crime victim population to be served.
- c. Victim eligibility requirements for the applicant's services
- d. A description of substantial financial support from other sources.
- e. The intended use of volunteers, if any.
- f. The stated goals and objectives of the program.
- g. A description of the proposed victim service, training, or technical assistance to be implemented during the funding year.
- h. The amount of grant funds requested.
  - i. The amount of cash or in-kind resources or combination thereof which is committed where required by the division.
  - j. A description of how the proposed victim service, training, or technical assistance will provide or improve services to victims of crime.
- k. Proof of coordination with appropriate agencies at the local level.
  - l. A total program budget for all services provided by the applicant's crime victim program.
- m. A proposed budget for the requested grant funds.
- n. A list of other anticipated sources of income, including written commitments, if possible, and plans for continued funding of the grant-funded activities.
- o. Other information identified in the RFP.
- p. Signed certified assurances as required by state and federal statute or regulation.

**Project or Program Budgets:** For each contract year, agencies are to submit a budget prior to the issuance of a contract. This budget is specific to the funding cycle, generally 12 months (October 1 through September 30) and specific to the program or project.

**Budget Justification:** A budget justification is the narrative explanation, or description of proposed costs in a budget. The purpose of the budget justification is to help reviewers understand the breakdown of costs and how the costs were calculated. The budget and the budget justification must match. Victim Assistance can require additional information from applicants.

Application workshops are generally conducted at the time a grant solicitation is released. Application workshops provide instruction on the grant application process and allow applicants to ask questions or seek clarification on the application process. The application workshops will be either held in person or provided via webinar and are recorded for later viewing.

Once the application has been released, to ensure fairness and equity, all questions from applicants regarding the application will be made public.

## **Extension on Application for Funding**

[Administrative Rule 61-9.54(13)(1)].

Extensions on the filing deadline are rare and may be allowed only at the direction of the Section Chief or VSS Administrator if there is good cause.

A request for an extension must be made to the VSS Administrator or Section Chief, in writing, in advance of the application deadline. A request must be submitted on agency letterhead and must detail the need for an extension and the good cause reason(s) for why the request should be granted. The VSS Administrator or Section Chief will make a determination and notify the agency within 72 business hours. The determination made by the Section Chief shall be final.

## Combined or Joint Agency Applications

[Administrative Rule 61-9.54(13)(4)]

Applicants are allowed to submit a combined application if a combined application (two or more agencies) will encourage cooperation between those agencies on behalf of crime victims. Each agency receiving funds under a combined application shall sign a grant contract for the use of awarded funds.

Combined applications are often submitted by criminal justice agencies, such as law enforcement offices filing from one community or county.

Examples:

- a. Law enforcement within a community or county will write one application for funding for an initiative involving several law enforcement agencies.
- b. Law enforcement agency writes a combination application with the local prosecutor's office.

## Application Review Process for Competitive Applications

[Administrative Rule 61-9.57(13)]

Victim Assistance shall conduct a preliminary review of each application to ensure the applicant is eligible, the application is complete, and the proposed victim service, training or technical assistance is consistent with the division's mission of providing quality assistance to crime victims and crime victim programs throughout the state.

Per [Rule 61-9.57\(2\)a](#), the grant review committee is comprised of representatives from the crime victim assistance board and experts in the field of victims services, grant administration and management and criminal justice.

The committee may include, but is not limited to the Victim Assistance staff, law enforcement, prosecutors, and other experts across professions in connection with victim services and best practices. The review committee should reflect diversity in gender, race, ethnicity, sexual orientation, geographic location, skills and expertise.

The ARC shall be provided with information related to the applicant's performance with previous funds, the quality and quantity of services provided, and community support for the applicant. The ARC shall review the content of the applications and information provided by the Victim Assistance staff and members of the ARC regarding the applicant and the geographical area to be served.

All ARC members are required to sign a [conflict of interest form](#).

Victim Assistance uses generally accepted methods of application review including but not limited to checklists, quality scales, points-based systems, written comment by applicant reviewers, formulas based on past funding, population, clients served, region or area served, and available funds.

The leadership of the Victim Assistance Section oversee and manage the ARC meeting. The general flow of the ARC meeting is as follows:

- VSS Administrator makes introductions of all present, provides logistical information and reviews the

process and packet of information with the ARC members.

- Recommendations for award, denial, or increase/decrease in the award amount for applications are presented by the ARC along with discussions of the reasons for their recommendations.
- Victim Assistance staff provide comments about the applications reviewed, including applicants' fiscal history, history of program management, contact with VSS staff, performance reports and site monitoring reports as well as staff recommendations for funding.
- Prior to or during the review, the Victim Assistance finance team provides any additional comments on an applicant's budget, financial history of the program and audits.
- VSS staff records all comments about why a program was recommended for approval or denial, including any special conditions, which may be required of the program.
- A VSS staff person or other designee by the VSS Administrator averages the scoring and funding recommendations by region and then the entire ARC including VSS staff determines whether the result is fair and equitable. Actual funding amounts may or may not be determined by the ARC, depending on the type of application.
- The final funding amount is determined by Victim Assistance based on available funding or, by determination from the ARC, including any contract special conditions or areas where the VSS staff should provide technical assistance to the applicant.
- When applicable, the VSS Administrator, or designee tracks the award amounts, as well as the amount available to distribute. The VSS Administrator and/or staff designee, track any contract special conditions and any areas of concern requiring technical assistance.
- The ARC is then thanked and released from their duties as reviewers. The VSS Administrator or designee provides the final recommendation of the programs selected by the ARC to received funding and if applicable, the amount of funding allocated to each program as recommended by the ARC. ARC reviewers volunteer their time to participate in the application review but may be compensated for travel related expenses, if allowed.

## Award Recommendations

ARC funding recommendations are prepared by Victim Assistance staff and provided to the Crime Victim Assistance (CVA) Board in advance of the next scheduled board meeting.

There may be two-pronged recommendations from the VSS staff and the ARC:

1. which applicant programs and agencies to designate for funds during the grant cycle, and if applicable;
2. the amount of funds to be awarded to each designated program.

The Section Chief has discretion to present a separate funding recommendation to the CVA Board.

The Board shall consider the recommendations of the ARC and the Section Chief to determine final competitive awards to the extent funds are available and the application criteria have been met. The Board may reject any or all applications. The CVA Board designates the programs and agencies to receive funding and the amount of the award for each.

## Application Review Process for Focus Grant Applications

[Administrative Rule 61-9.57(4)]

In selection of programs for a focus grant, a written proposal shall be solicited from current programs or other interested parties. Interested grantees shall submit a proposal to the director outlining the purpose, cost, and outcome of the proposed grant.

The Section Chief shall submit a recommendation to the Deputy Attorney General overseeing the Victim Assistance Section, who shall make a final decision based on the availability of funds and the merits of the proposal.

## Award Notifications

[Administrative Rule 61-9.58(13)]



Each applicant shall be notified, within 90 days of the application due date as to whether they have been denied or approved by the CVA Board. If approved, the applicant will also be informed of the amount of funds approved for the application. Each applicant receives notice through either an award letter, or a denial letter outlining the reason(s) for denial. The denial letter also outlines the Request for Reconsideration (appeal) instructions.

## Requests for Reconsideration or Appeal Process

[Administrative Rule 61-9.59(13)(1-3)]

Applicants may file a request for reconsideration (appeal) to the CVA Board regarding the denial of a grant proposal or the award amount of proposal. The request for reconsideration must be submitted within ten working days of the date the notice of decision is issued by the Victim Assistance to the applicant. The request must state the specific grounds for reconsideration and must be provided in writing. Appealing a funding decision is to be based on Victim Assistance misconduct, ineffective review processes, disparities in funding or miscalculation of funding amounts. The appeals process is not an opportunity to resubmit an application or to provide additional information for consideration.

Upon receipt of a request for reconsideration or appeal, a notice will be sent to applicants whose funds may be affected by the appeal. Victim Assistance staff will provide a written response to the appellant regarding their request for reconsideration. The CVA Board or designated committee will be provided the following materials to review when considering appeals:

- appellant's grant application
- appellant's letter of appeal and any supporting documentation
- award notification letter
- application review notes and recommendation
- Victim Assistance response to the appeal

The CVA Board will conduct an appeal hearing to review appeals and determine final funding awards. The CVA Board allows the appellant to address the denial, or award recommendation in-person, or virtually. Any applicant who may be adversely affected by the appeal is also invited to attend and participate in the appeal. CVA Board members may ask questions of the appellant. A decision of the board or designated committee shall constitute final agency action.

Funds shall not be disbursed pending a request for reconsideration to the extent the funds are affected by the outcome of the request. Every applicant who could be adversely affected shall be notified if a request for reconsideration is approved, and awards are reduced as necessary.

In the event an original award denial or amount decision is overturned, adjustments are made to any other awards affected in the region, zone, project category, or service category for which the appeal was made. All affected grantees will be notified of the adjustments.

## How to Submit an Appeal

Appellants must submit a letter on agency letterhead signed by the organization's authorized official requesting the appeal and detailing the reasons for the appeal. Appellants can provide documentation to support their appeal. Keep in mind appealing a funding decision is to be based on Victim Assistance misconduct, ineffective review processes, disparities in funding or miscalculation of funding amounts. The appeals process is not an opportunity to resubmit an application or to provide additional information for consideration.

### **GVS Instructions to submit appeals:**

1. From the left navigation panel select the STATUS OPTION Submit Appeal
2. From the appeal information page, select Grant Award Reconsideration as the type of appeal
3. Follow the instructions on the appeals page

4. Change the status to submit appeal in the left navigation panel

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## Iowa Code Languages and Administrative Rules

Authorizing Statutes in the Code of Iowa—Crime Victim Assistance Division

Iowa Department of Justice

Attorney General's Office

Iowa Crime Victim Assistance Division

Authorizing Statutes in the Code of Iowa

(Crime Victim Assistance Division)

### 13.31 Victim assistance program.

A victim assistance program is established in the department of justice, which shall do all of the following:

1. Administer grants received under the federal Victims of Crime Act pursuant to Pub. L. No. 98-473, Tit. 2, ch. 14, 42 U.S.C. § 10601, as amended by the federal Children's Justice and Assistance Act, Pub. L. No. 99-401, 100 Stat. 903 (1986).
2. Administer the state crime victim compensation program as provided in [chapter 915](#).
3. Administer the domestic abuse program provided in [chapter 236](#) and the sexual abuse program provided in [Chapter 236A](#).
4. Administer the family violence prevention and services grants pursuant to the federal Child Abuse Amendments of 1984, Pub. L. No. 98-457, 42 U.S.C. § 10401.
5. Administer payment for sexual abuse medical examinations pursuant to [section 915.41](#).
6. Administer the violence against women program and grants received pursuant to the federal Violence Against Women Act, Tit. IV of the Violent Crime Control and Law Enforcement Act of 1994, Pub. L. No. 103-322, 42 U.S.C. § 13701.
7. Administer an automated victim notification system as authorized pursuant to [915.10A](#).

[89 Acts, ch 279, §1 \(PDF\)](#); [90 Acts, ch 1251, §1 \(PDF\)](#); [91 Acts, ch 181, §16 \(PDF\)](#); [98 Acts, ch 1090, §58, 84 \(PDF\)](#); [2002 Acts, ch 1016, §1 \(PDF\)](#); [2007 Acts, ch 27, §1 \(PDF\)](#); [2017 Acts, ch 121, §1 \(PDF\)](#)

*Federal Act reference updated pursuant to Code editor directive*

### Iowa Authorizing Statutes in the Code of Iowa-Victim Services Support Program

#### Victim Services Support Program

(Domestic Abuse and Sexual Abuse Program and domestic and sexual abuse hotlines)

#### 236.16 Department powers and duties.

1. The department shall:
  - a. Designate and award grants for existing and pilot programs pursuant to [this chapter](#) to provide emergency shelter services and support services to victims of domestic abuse.
  - b. Design and implement a uniform method of collecting data from domestic abuse organizations funded under [this chapter](#).
  - c. Designate and award moneys for publicizing and staffing a statewide, toll-free telephone hotline for use by victims of domestic abuse. The department may award a grant to a public agency or



a private, nonprofit organization for the purpose of operating the hotline. The operation of the hotline shall include informing victims of their rights and of various community services that are available, referring victims to service providers, receiving complaints concerning misconduct by peace officers and encouraging victims to refer such complaints to the office of ombudsman, providing counseling services to victims over the telephone, and providing domestic abuse victim advocacy.

- d. Advertise the toll-free telephone hotline through the use of public service announcements, billboards, print and broadcast media services, and other appropriate means, and contact media organizations to encourage the provision of free or inexpensive advertising concerning the hotline and its services.
  - e. Develop, with the assistance of the entity operating the telephone hotline and other domestic abuse victim services providers, brochures explaining the rights of victims set forth under [Section 236.12](#) and the services of the telephone hotline, and distribute the brochures to law enforcement agencies, victim service providers, health practitioners, charitable and religious organizations, and other entities that may have contact with victims of domestic abuse.
2. The department shall consult and cooperate with all public and private agencies which may provide services to victims of domestic abuse, including but not limited to, legal services, social services, prospective employment opportunities, and unemployment benefits.
  3. The department may accept, use, and dispose of contributions of money, services, and property made available by an agency or department of the state or federal government, or a private agency or individual.

[85 Acts, ch 175, §7; 89 Acts, ch 279, §6; 91 Acts, ch 218, §15; 2013 Acts, ch 10, §30 \(PDF\)](#)

## Iowa Administrative Code Iowa Administrative Rules Code-Crime Victim Assistance Division & Crime Victim Assistance Board

Attorney General — 61

### Chapter 9

#### VICTIM ASSISTANCE PROGRAM

(Crime victim assistance division)

#### DIVISION I

#### ADMINISTRATION

(Crime Victim Assistance Board)

#### 61—9.1(912) Definitions.

*“Board”* means crime victim assistance board.

*“Department”* means Iowa department of justice.

*“Director”* means director of the crime victim assistance division established in the department of justice.

#### 61—9.2(912) Board.

**9.2(1)** A crime victim assistance board is established pursuant to Iowa Code section 912.2A.

**9.2(2)** Members of the board shall serve terms for three years and are eligible for reappointment to the board by the attorney general.

**9.2(3)** The initial term of the board members shall commence on 7/1 of the state fiscal year.

**61—9.3(912) Expenses.**

**9.3(1)** Board members shall be reimbursed from the victim's compensation fund for expenses actually and necessarily incurred in the discharge of their duties including attendance at board meetings, board committee meetings, and other activities on behalf of the board as designated by the board chair and approved by the department. Reimbursement for expenses shall conform with guidelines established by the department of revenue.

**9.3(2)** A member of the board may receive, in addition to actual expense reimbursement, a per diem which conforms with guidelines established by the department of revenue.

**9.3(3)** Expenses of the board and individual members shall be submitted to the director.

**61—9.4(912) Chair of the board.**

**9.4(1)** The attorney general shall select one of the members of the board to serve as chair of the board. The chair shall serve at the pleasure of the attorney general.

**9.4(2)** A member who is chair of the board and relinquishes or is removed as the chair may maintain board membership for the remainder of the term for which the member was originally appointed.

**61—9.5(912) Resignations.**

**9.5(1)** Resignations from the board shall be made to the attorney general.

**9.5(2)** Whenever a member of the board ceases to have the statutory qualifications for appointment to the board, that member shall be considered to have resigned and a vacancy shall occur on the board.

**9.5(3)** A board member shall be deemed to have submitted a resignation from the board if any of the following events occur:

- a. The member does not attend three or more consecutive regular meetings of the board. This paragraph does not apply unless the first and last of the consecutive meetings counted for this purpose are at least 30 days apart.
- b. The person attends less than one-half of the regular meetings of the board within any period of 12 calendar months beginning July 1. This paragraph applies only to such a period beginning on or after the date when the person is appointed to the board.
- c. If the member receives no notice and had no knowledge of a regular meeting and gives the attorney general a sworn statement to that effect within ten days after the person learns of the meeting, such meeting shall not be counted for the purposes of this rule.
- d. The attorney general at the attorney general's discretion may accept or reject such resignation. If the attorney general accepts it, the attorney general shall notify the member, in writing, that the resignation is accepted pursuant to this rule. The attorney general shall then make another appointment to fill the vacancy.

**61—9.6(912) Vacancies.** Barring unusual circumstances, vacancies on the board shall be filled within 45 days after the attorney general is advised of the vacancy. Vacancies shall be filled for the remainder of the vacant term.

**61—9.7(912) Meetings.** The board shall meet a minimum of once per quarter. The board may also meet at the call of the chair or upon the written request to the chair of at least five members of the board.

**61—9.8(912) Duties of board.** The board shall adopt rules pursuant to Iowa Code chapter 17A relating to the administration of the crime victim assistance division including the adoption of administrative rules

relating to the following:

1. Administration of grants received under the federal Victims of Crime Act of 1984 pursuant to Pub. L. No.98-473, Title 2, Chapter 14, 42 U.S.C. Section 10601, as amended by the Children's Justice and Assistance Act of 1986, Pub. L. No.99-401, 100 Stat. 903 and as amended by the Anti-Drug Abuse Act of 1988, Title VII, subtitle D, Pub. L. No.100-690.
2. Administration of the Family Violence Prevention and Services Act grant pursuant to the federal Child Abuse Amendments of 1984, Pub. L. No.98-457, 42 U.S.C. Section 10401, reauthorized in 1988, Pub. L. No.100-294.
3. Administration of the domestic abuse and rape crisis funds and the Iowa domestic abuse hotline funds provided in Iowa Code chapter 236.
4. Administration of other grants or funds available by public law for victim assistance and administered by the department.
5. Administration of the victim compensation program provided in Iowa Code chapter 912.
6. Administration of sexual abuse examination payments as provided in Iowa Code section 709.10.
7. Appeal procedures for victim compensation claims denied by the department.
8. Appeal procedures for grants administered by the department and denied by the board.

**61—9.9(912) Director and staff.** The attorney general shall employ a director and staff for the victim assistance division and they shall be employees of the department.

**61—9.10(912) Duties of department.** In addition to the duties contained in Iowa Code section 13.13, the department shall:

1. Administer other funds, grants, or programs for victim assistance created by public law or the department.
2. Provide administrative support to the board.
3. Enter into agreements under Iowa Code chapter 28E or other law including agreements with other state agencies and political subdivisions for the transfer to the department of funds authorized by law for victim service programs.
4. Accept, use, and dispose of contributions of money, services, and property, which are made available by an agency or department of the state or any of its political subdivisions, the federal government, a private agency, or an individual, that are specifically designated for crime victim assistance programs.

**61—9.11 to 9.24** Reserved.

## Iowa Administrative Rule Code-Victim Services Grant Program

### VICTIM SERVICES GRANT PROGRAM

(Victim Services Support Program)

**61—9.50(13) Administration of the victim services grant program.** The victim services grant program of the Iowa department of justice shall administer the victim services grants as provided in Iowa Code chapters 13 and 236. All questions, comments, requests for information, or applications for grant funds shall be directed to the victim services grant program. Requests should be addressed to: Crime Victim Assistance Division, Iowa Department of Justice, 321 East 12th Street, Lucas State Office Building, Ground Floor, Des Moines, Iowa 50319, telephone (515)281-5044.

**61—9.51(13) Definitions.** As used in this chapter:

*“Applicant”* means a public or private nonprofit program that provides direct services to crime victims or training and technical assistance to crime victim service providers and that makes a request for funds from the victim services grant program.

*“Application”* means a request which complies with federal and state requirements for funds from the following funding streams:

1. The federal Victims of Crime Act.

2. The state domestic and sexual abuse program funds provided for in Iowa Code chapter 236.
3. The federal Family Violence Prevention and Services Act.
4. The federal Violence Against Women Act.
5. Other grants or funds available by law for crime victim assistance.

“*Board*” means the crime victim assistance board.

“*Competitive grant*” means a grant for which the division solicits a request for proposals (RFP) from eligible applicants, reviews the applications for eligibility and completeness, and then convenes a grant review committee to recommend grant awards to the crime victim assistance board.

“*Crime victim center*” means a crime victim center as defined in Iowa Code section 915.20A(1).

“*Department*” means the Iowa department of justice.

“*Director*” means director of the crime victim assistance division of the Iowa department of justice.

“*Division*” means the crime victim assistance division of the Iowa department of justice.

“*Focus grant*” means a one-time grant for specific activities, including but not limited to training, travel, or materials, awarded at the discretion of the division directly to a program that has received a competitive grant in the fiscal year.

“*Funding stream*” means a distinct source of federal or state funding available for grants.

“*Grant*” means a competitive or focus grant award to a local or statewide government or private nonprofit agency.

“*Grantee*” means a local or statewide government or private nonprofit agency that is awarded or receives funds from the crime victim assistance division.

“*Grant review committee*” means a division committee designated to review grant applications.

“*Justice support*” means duties performed in the justice system related to investigation, prosecution, or disposition of a criminal case that assist or inform a victim of crime.

“*Program*” means the victim services grant program of the Iowa department of justice.

“*RFP*” means request for proposals.

“*Victim*” means a crime victim as defined in Iowa Code section 915.80.

**61—9.52(13) Program description.** Any eligible local or statewide government or private nonprofit agency or a combination thereof may apply for and receive a grant through the program. The program shall operate as a competitive and focus grants program and be administered by the department. A contractual agreement specifying the terms of the grant award shall be executed between the department and the approved applicant.

**61—9.53(13) Availability of grants.** In any year in which federal or state funds are available, the division shall administer grants with eligible applicants. The amount of the funds awarded shall be contingent upon the funds available. The director shall announce the opening of an application period through public notice including but not limited to notice to current grantees and other eligible agencies identified by the program. Applications must be received by the designated due date.

**9.53(1)** Competitive grants will be awarded based on the availability of funds, history and demonstration of quality of services provided, compliance with the requirements of the division, number of victims served or

cases investigated and prosecuted, population served, and geographical distribution of funds in the state. A preference shall be given to continued funding of successful grantees.

**9.53(2)** Focus grants will be awarded at the discretion of the director and of the deputy attorney general who oversees the division. Funds utilized for focus grants must comply with all applicable state and federal rules and regulations. The total of focus grants from one funding source may not exceed 3 percent of the funds available from the funding source in one state fiscal year.

**61—9.54(13) Application requirements.** Applicants shall submit applications to: Crime Victim Assistance Division, Iowa Department of Justice, 321 East 12th Street, Lucas State Office Building, Ground Floor, Des Moines, Iowa 50319. Applications shall be in the form prescribed by the division and shall be available upon request to all interested parties.

**9.54(1)** To be included in the review process and considered for funding, an application shall be received in the offices of the division by 4:30 p.m. on the due date. Applications may be delivered to the division during regular business hours any time prior to the deadline. An extension of the filing deadline may be requested of the director or grant administrator prior to the deadline and may be granted for good cause. The determination of a good cause extension by the division director shall be final.

**9.54(2)** An applicant shall have on file with the division current copies of the applicant's table of organization and articles of incorporation as required.

**9.54(3)** An applicant shall have on file with the division evidence of any insurance coverage the applicant carries for liability or property.

**9.54(4)** The division may allow combined applications from two or more agencies if a combined application will encourage cooperation between those agencies on behalf of crime victims. Each agency receiving funds under a combined application shall sign a grant contract for the use of awarded funds.

**61—9.55(13) Contents of application.** Each application shall contain the following information:

**9.55(1)** A paragraph describing the agencies or units of government requesting the funds.

**9.55(2)** A description of services for which funding is being requested. The description shall include, but not be limited to, the following:

- a. The geographical area to be served.
- b. The crime victim population to be served.
- c. Victim eligibility requirements for the applicant's services.
- d. A description of substantial financial support from other sources.
- e. The intended use of volunteers, if any.
- f. The stated goals and objectives of the program.
- g. A description of the proposed victim service, training, or technical assistance to be implemented during the funding year.
- h. The amount of grant funds requested.
  - i. The amount of cash or in-kind resources or combination thereof which is committed where required by the division.
  - j. A description of how the proposed victim service, training, or technical assistance will provide or improve services to victims of crime.
- k. Proof of coordination with appropriate agencies at the local level.
  - l. A total program budget for all services provided by the applicant's crime victim program.
- m. A proposed budget for the requested grant funds.
- n. A list of other anticipated sources of income, including written commitments, if possible, and plans for continued funding of the grant-funded activities.
- o. Other information identified in the RFP.
- p. Signed certified assurances as required by statute or regulation.



**61—9.56(13) Eligibility requirements.** Funds must be used only to provide victim services, or justice support to victims of crime, and training or technical assistance to victim service providers and allied professionals. Program grants shall not be used to supplant other available or mandated funds. An applicant must meet the following requirements:

**9.56(1)** The applicant shall be a public agency or private nonprofit organization, or combination thereof, that provides services to crime victims or training and technical assistance to victim service providers and allied professionals.

**9.56(2)** The applicant shall provide services to victims of crime through crime victim centers, law enforcement officers, prosecutors, and other allied professionals. Services provided to victims by crime victim centers shall include but are not limited to crisis intervention, law enforcement and court advocacy, group and individual follow-up counseling, transportation, and information and referral.

**9.56(3)** An applicant providing services to victims of domestic abuse must also provide or arrange safe shelter for victims and their children when needed at no cost to the victims. To ensure staff training and best practice standards, preference will be given to domestic abuse programs certified by the Iowa Coalition Against Domestic Violence.

**9.56(4)** An applicant providing services to victims of sexual abuse must also provide support to victims at the time of an evidentiary sexual abuse examination. To ensure staff training and best practice standards, preference will be given to sexual abuse programs certified by the Iowa Coalition Against Sexual Assault.

**9.56(5)** The applicant shall promote within the community a coordinated public and private effort to assist victims.

**9.56(6)** The applicant shall be an equal-opportunity employer and provide services on an equal-opportunity basis.

**9.56(7)** The applicant shall comply with applicable federal and state statutes and rules, all requirements specified in the grant between the department and any outside funding source, and all requirements in the RFP or any other contractual document.

**9.56(8)** The applicant shall assist victims in seeking state compensation benefits.

**9.56(9)** The applicant shall have a grievance procedure established for victims, employees and volunteers.

**9.56(10)** The applicant shall ensure that all employees and volunteers of crime victim centers that provide direct services to victims are trained as victim counselors as defined in Iowa Code section 915.20A.

**9.56(11)** The applicant shall provide services within the geographical service area without regard to a victim's ability to pay.

**9.56(12)** An existing program must document results of prior programming that demonstrate that the needs of victims have been met effectively and that the applicant has financial support from other sources.

**61—9.57(13) Selection process.** The division shall conduct a preliminary review of each application to ensure that the applicant is eligible, the application is complete, and the proposed victim service, training or technical assistance is consistent with the division's mission of providing quality assistance to crime victims and crime victim programs throughout the state.

**9.57(1)** In selection of competitive grantees, the division may utilize generally accepted methods of grant review including but not limited to checklists, quality scales, written comments by grant review committee members, and formulas based on past funding, population, clients served and available funds.



**9.57(2)** In selection of competitive grantees, the division shall establish a grant review committee. The committee shall submit recommendations for grant awards to the director. The director shall submit to the board the recommendations of the grant review committee and any alternative recommendations by the program staff.

- a. The committee shall be comprised of representatives from the crime victim assistance board and experts in the fields of victim services, grant administration and management, and criminal justice.
- b. The division shall provide the committee with information related to the applicant's performance with previous grants, the quality and quantity of services provided, and community support for the applicant.
- c. The committee shall review the content of the grant applications and information provided by the division and members of the committee regarding the applicant and the geographical area to be served

**9.57(3)** The board shall consider the recommendations of the grant review committee and the director to determine final competitive grant awards to the extent that funds are available and to the extent to which applications meet the RFP criteria. The board may reject any or all applications.

**9.57(4)** In selection of grantees for a focus grant, a written proposal shall be solicited from current grantees. Interested grantees shall submit a proposal to the director outlining the purpose, cost, and outcome of the proposed grant. The director shall submit a recommendation to the deputy attorney general for criminal justice who shall make a final decision based on the availability of funds and the merits of the proposal.

**61—9.58(13) Notification of applicants.** An applicant shall be notified within 90 days after the application due date whether the application has been denied or approved by the board and the amount of funds approved for the application.

**61—9.59(13) Request for reconsideration.**

**9.59(1)** An applicant may file with the board a request for reconsideration of the denial or of the amount of an award. The request for reconsideration must be submitted within ten working days of the date the notice of decision is mailed or otherwise issued by the director to the grantee. The request must state grounds for reconsideration. The board or a committee designated by the board chairperson shall review the request in a timely manner. A decision of the board or designated committee shall constitute final agency action.

**9.59(2)** At the time a request for reconsideration is received by the director, notice that a request for reconsideration has been filed shall be sent to all approved applicants whose funds may be affected by the request.

**9.59(3)** Funds shall not be disbursed pending a request for reconsideration to the extent that the funds are affected by the outcome of the request. Every applicant that would be adversely affected shall be notified if a request for reconsideration is approved, and grant awards shall be reduced as necessary.

**61—9.60(13) Contract agreement.**

**9.60(1)** A contract shall be negotiated by the department and the applicant.

**9.60(2)** Prior to entering into a contract, the department or the board may require modification of the proposed program, submission of further information or documents, or other stipulation of the applicant. The required modification, information, document, or stipulation shall be specified in the notification of grant award.

**9.60(3)** The applicant or the department may request a modification of the program budget to reflect the amount, expenses and activities allowed by the grant award. Both parties must agree to any modification of the grantee program budget.

**9.60(4)** In the event of a state, federal, or other audit, the grantee shall be responsible for the audit and liable for payment of any funds required to conduct the audit, to compensate for any grant disallowance, or to repay any funds received or spent contrary to the contract, these rules, or applicable law.

**9.60(5)** Funds shall be spent to meet the program proposals as provided in the contract. Expenditures shall be reimbursed pursuant to regular reimbursement procedures of the state of Iowa.

**9.60(6)** The grantee shall sign the certified assurances for the grant program at the time of application and at any time requested by the division.

**9.60(7)** Nothing in these rules shall be construed as limiting the remedies available to the state or the program for improper use of grant funds or other breach of the grantee's duties under the contract and applicable law.

**61—9.61(13) Performance reports.** Performance reports shall be submitted to the division from all grantees. Failure to submit reports by the due date shall result in suspension of financial payments to the grantee by the program until such time as the report is received. Delinquent or inadequate reports from prior grants may detrimentally influence the award of grants for the following year.

**61—9.62(13) Termination.** Contracts may be terminated for the following reasons:

**9.62(1) Termination by grantee.** The grantee may terminate the contract at any time during the contract period by providing notice to the division.

**9.62(2) Termination by department.** The department may terminate a contract upon a ten-day notice when the grantee or any of its subcontractors fail to comply with the grant award stipulations, standards or conditions. The department may terminate a contract when there is a reduction of funds by executive order or otherwise.

**9.62(3) Termination for cause.** If the grantee fails to fulfill its obligations under the agreement properly or on time, or otherwise violates any provision of the agreement, the board may terminate the agreement by written notice to the grantee. The notice shall specify the acts or omissions relied on as cause for termination. All finished or unfinished products and services provided by the grantee shall, at the option of the department, become state property. The department shall pay the grantee fair and equitable compensation for satisfactory performance prior to receipt of notice of termination minus any funds owing to the department, e.g., damages for breach, improperly spent funds.

**61—9.63(13) Financial statement supplied.** Within 45 days of the termination, the grantee shall supply the department with a financial statement detailing all costs incurred up to the effective date of the termination.

**61—9.64(13) Indemnification.** The grantee shall defend, indemnify, and hold harmless the state of Iowa, its officers, agents and employees and any of the state's federal funding sources for:

1. Grantee's performance or nonperformance of a contract entered into or violation of these rules.
2. Grantee's activities with subcontractors and all other third parties, or any other act or omission by a grantee, its agents, officers, and employees.

**61—9.65(13) Records.** Grantees shall keep statistical records of services provided and any other records as required by the division. The division shall have immediate access during working hours to records pertaining to the contract. No notice need be provided the grantee prior to inspection of the records.

These rules are intended to implement Iowa Code section 13.31.

**61—9.66 to 9.79** Reserved.

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# Eligibility Requirements

For a detailed description of grant specific eligibility requirements, that includes the type of agency/organization eligible to apply, please proceed to [Chapter XXV. Fund Sources Chapter](#).

## **General Eligibility Requirements per [Administrative Rule 61-9.56(13)(1-12)]**

In order to be grant funded, an applicant must meet the following requirements:

- The applicant shall be a public agency or private nonprofit organization, or combination thereof, that provides services to crime victims, or training and technical assistance to victim service providers and allied professionals.
- The applicant shall provide services to victims of crime through crime victim centers, law enforcement officers, prosecutors, and other allied professionals. Services provided to victims by crime victim centers shall include but are not limited to crisis intervention, law enforcement and court advocacy, group and individual follow-up counseling, transportation, and information and referral.
- An applicant providing services to victims of domestic abuse must also provide or arrange safe shelter for victims and their children when needed, at no cost to the victims. To ensure staff training and best practice standards, preference will be given to domestic abuse programs certified by the Iowa Coalition Against Domestic Violence.
- An applicant providing services to victims of sexual abuse must also provide support to victims at the time of an evidentiary sexual abuse examination. To ensure staff training and best practice standards, preference will be given to sexual abuse programs certified by the Iowa Coalition Against Sexual Assault.
- The applicant shall promote within the community a coordinated public and private effort to assist victims.
- The applicant shall be an equal-opportunity employer and provide services on an equal-opportunity basis.
- The applicant shall comply with applicable federal and state statutes and rules, all requirements specified in the grant between the department and any outside funding source, and all requirements in the RFP or any other contractual document.
- The applicant shall assist victims in seeking state compensation benefits.
- The applicant shall have a grievance procedure established for victims, employees and volunteers.
- The applicant shall ensure that all employees and volunteers of crime victim centers that provide direct services to victims are trained as victim counselors as defined in Iowa Code section 915.20A.
- The applicant shall provide services within the geographical service area without regard to a victim's ability to pay.
- An existing program must document results of prior programming that demonstrate the needs of victims have been met effectively and the applicant has financial support from other sources.

# Certified Assurances

[Determination of suitability to interact with participating minors](#)

[Policy for response to workplace-related incidents of sexual misconduct, domestic violence, and dating violence](#)

[VOCA Certifications](#)

[STOP Violence Against Women Certifications](#)

[Family Violence and Prevention Services Certifications](#)

[Sexual Assault Services Program Certifications](#)

[Victim Assistance Assurances Certifications](#)

Applicants are required to abide by the certified assurances associated with the relevant funding streams. Failure to abide by the certified assurances could suspend or terminate contracts associated with the violation of said assurance.

If you have any questions about certified assurances, please contact your grant coordinator.

**Victims of Crime Act (VOCA)** The purpose of the Victims of Crime Act (VOCA) funding is to provide high quality services that directly improve the health and well-being of victims of crime with priority given to victims of child abuse, domestic violence, sexual assault and services for previously underserved victims. The Office for Crime Victims (OVC) makes annual VOCA crime victim assistance grants from the Fund to states.

[VOCA Certified Assurances](#)

**Your grant agreement instructs grant recipients to download the VOCA certified assurances and have the authorizing official and the project director read and sign it. Since there is no place in Iowa GVS for grantees to upload the signed VOCA assurances, they do not have to be signed; however, key personnel need to read, understand and comply with all conditions contained in the assurances.**

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**STOP Violence Against Women Act (VAWA)**-STOP Violence Against Women Funds promote a coordinated, multidisciplinary approach to improving the criminal justice system's response to violence against women. This approach envisions a partnership among law enforcement, prosecution, the courts, victim advocates and service providers to ensure victim safety and offender accountability.

[STOP Violence Against Women Certified Assurances](#)

**Your grant agreement instructs grant recipients to download the STOP VAWA certified assurances and have the authorizing official and the project director read and sign it. Since there is no place in Iowa GVS for grantees to upload the signed STOP VAWA assurances, they do not have to be signed; however, key personnel need to read, understand and comply with all conditions contained in the assurances.**

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**Family Violence Prevention and Services Act (FVPSA)** funding supports programs that prevent incidents of family violence, domestic violence and dating violence. FVPSA Programs provide immediate shelter, supportive services and access to community-based programs for victims of family violence, domestic violence, or dating violence as well as for their dependents.

[Family Violence and Prevention Services Certified Assurances](#)

**Your grant agreement instructs grant recipients to download the FVPSA certified assurances and have the authorizing official and the project director read and sign it. Since there is no place in Iowa GVS for grantees to upload the signed FVPSA assurances, they do not have to be signed; however, key personnel need to read, understand and comply with all conditions contained in the assurances.**

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**Sexual Assault Services Program (SASP)** funding is to provide intervention, advocacy, accompaniment (e.g., accompanying victims to court, medical facilities, police departments, etc.), support services, and related assistance for adult, youth, and child victims of sexual assault, family and household members of victims and those collaterally affected by the sexual assault.

[Sexual Assault Services Program Certified Assurances](#)

**Your grant agreement instructs grant recipients to download the SASP certified assurances and have the authorizing official and the project director read and sign it. Since here is no place in Iowa GVS for grantees to upload the signed SASP assurances, they do not have to be signed; however, key personnel need to read, understand and comply with all conditions contained in the assurances.**

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**Victim Assistance Funding** All grantees must read and abide by Victim Assistance certified assurances. **Your grant agreement instructs grant recipients to download the Victim Assistance certified assurances and have the authorizing official and the project director read and sign it. Since here is no place in Iowa GVS for grantees to upload the signed Victim Assistance assurances, they do not have to be signed; however, key personnel need to read, understand and comply with all conditions contained in the assurances.**

[Victim Assistance Certified Assurances](#)

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[Determination of suitability to interact with participating minors](#)

One of the special conditions included in all certified assurances is the determination of suitability to interact with participating minors. In summary, your agency must determine if covered individuals are suitable to interact with participating minors. [OVW award condition document](#). This [document provides the definition of this award condition](#), clarification from Victim Assistance, resources and additional information regarding working with minors. Please direct questions or concerns to [Lori Miller](#).

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[Policy for response to workplace-related incidents of sexual misconduct, domestic violence, and dating violence -](#)

One of the special conditions in the STOP VAWA and SASP certified assurances is the requirement to have a policy, or issue a policy within 270 days of the award date, to address workplace-related incidents of sexual misconduct, domestic violence, and dating violence involving an employee, volunteer, consultant, or contractor. The details of this requirement are posted on the [OVW web site](#) (Award Condition: Policy for response to workplace-related sexual misconduct, domestic violence, and dating violence). Your policy must include how you handle allegations, workplace supports and description of the adjudications that will result to carry out the grant funded project. Consider a workplace includes more than just office space, it includes areas where trainings are held, cars and telework.

[Here is a model policy you can edit for your own agency.](#)

See the [OVW award condition document](#) for more information.

The resource center, [Workplaces Respond to Domestic and Sexual Violence](#) provides [resources to help organization implement policies](#).

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# Federal Funding Accountability and Transparency Act of 2006 (FFATA)

Federal Funding Accountability and Transparency Act of 2006 (FFATA), Public Law 109-282 Certification:

The potential subrecipient applying for federal funding must comply with FFATA. In order to apply for federal funding the agency must have a unique entity identifier, a replacement for the DUNS number, and when appropriate, must comply with Executive Compensation Reporting.

FFATA was signed on September 26, 2006, and requires the existence of a [single searchable website](#), accessible by the public at no cost, that includes information about where and how federal funds are spent. This includes information on grants, subgrants, loans, awards, cooperative agreements and other forms of financial assistance funded with federal funds of \$30,000 or greater. State agencies that receive federal awards now report subgrant information for public access.

Unique Entity Identifier: In **April of 2022**, the federal government stopped using the DUNS number to uniquely identify entities. At that point, entities doing business with the federal government will use a unique entity identifier created in SAM.gov. This transition allows the government to streamline the entity identification and validation process, making it easier and less burdensome for entities to do business with the federal government.

Executive Compensation Reporting: FFATA now requires subrecipients of federal funds to report the names and total compensation of the most highly compensated executives (i.e., officers, managing partners, or any other employees in management positions) if they meet all of the following criteria:

1. 80 percent or more of the subrecipient's annual gross revenues from Federal procurement contracts and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320; and
2. \$25,000,000 or more in annual gross revenues from Federal procurement contracts, and Federal financial assistance subject to the Transparency Act; and
3. The public does not have access to information about the compensation of the executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the [U.S. Security and Exchange Commission total compensation filings](#)).

# Conflict of Interest

Personnel and other officials connected with agency-funded programs shall adhere to the following requirements:

**Subrecipients—Appearance:** In the use of agency project funds, officials or employees of State or local units of government and non-governmental subrecipients shall avoid any action that might result in, or create the appearance of:

- Using an official position for private gain;
- Giving preferential treatment to any person;
- Losing complete independence or impartiality;
- Making an official decision outside official channels;
- Affecting adversely the confidence of the public in the integrity of the government or the program.

For example, where a recipient of federal funds makes sub-awards under any competitive process and an actual conflict or an appearance of a conflict of interest exists, the person for whom the actual or apparent conflict of interest exists should recuse him- or herself not only from reviewing the application for which the conflict exists, but also from the evaluation of all competing applications.

## Conflict of Interest- Grant Application Reviewer

It is the responsibility of the application reviewer to notify Victim Assistance if there is a possible conflict of interest in reviewing a specific funding application he/she has been assigned to review, score and make a funding recommendation.

A conflict of interest exists when the application reviewer, his/her immediate family, partners or organizations have a direct financial interest in a funding application assigned to the reviewer. Furthermore, a conflict exists when the vote of any member is influenced or may appear to the public to be influenced, by some consideration apart from the merits of the issue being voted upon.

Prior to someone becoming a grant application reviewer, they will be required to complete and submit a [conflict of reviewer form](#).

# Chapter 2 Post Award Requirements

## Awarding Contracts

[Administrative Rules 61-9.60(13) (1-7)]

Each applicant designated to receive funding will receive a contract specifying the terms and conditions of receiving victim services funding, including the CFDA or assistance listing number and the federal award number for each funding stream awarded.

Victim Assistance issues contracts only after the Crime Victim Assistance (CVA) Board has made their funding decisions and the timeline for requests for reconsideration (appeals) has lapsed. Attorney General staff or the CVA Board may require modifications of the proposed project, submission of additional information or documents, or other contract stipulations. The required modification, information, document, or stipulation shall be specified in the notification of grant award.

Award contracts are normally dispersed prior to the start date of the project period.

# Subaward Agreements

[Contract period](#)

[Signing contracts](#)

[Termination of contracts](#)

## Contract Period

Subrecipient subawards (contracts) are issued annually for every year of the three-year grant award period.

The majority of contracts are issued for a 12-month period beginning October 1<sup>st</sup> and ending September 30<sup>th</sup> of the following year. The subaward will include the amount of funds awarded for that year. During any multi-year award cycle, subawards are issued annually.

Subrecipients must remain in compliance with state and federal rules and in good standing with the Victim Services Support Program (VSS) requirements and procedures to receive funding in the second and third years of the grant cycle. The amount of funding awarded to subrecipients in the second and third year of the grant cycle will be based on the availability of State and Federal funds.

Subrecipients will not be allowed to carry over or extend prior awards into the next fiscal year unless approved by Victim Assistance and allowed by the federal funder. Any unspent funds at the end of the contract period will be returned.

## Signing Contracts

Both parties must sign the subaward (contract) before expenses can be reimbursed.

The subrecipient's authorized official electronically signs the contract and submits it via Iowa GVS. The authorized official is the individual designated by your agency to sign contracts. The authorized official could be the executive director, board president, board chair, county supervisor, sheriff, police chief, county attorney, etc.

[To submit a signed contract via Iowa GVS](#), subrecipients must status change the grant from Contract Pending Grantee Signature to Contract Pending CVAD Signature. This will move the grant to Victim Assistance for signature.

A final copy of the executed contract will be uploaded into Iowa GVS on the Grant Agreement Signatures page.

## Termination of a Contract

[Administrative Rule 61-9.62(13)(1-3)]

Contracts may be terminated for the following reasons:

- *Termination by funded program (subrecipient)*. The subrecipient may terminate the contract at any time during the contract period by providing notice to the division.
- *Termination by department*. The department may terminate a contract when the subrecipient or any of its subcontractors fail to comply with the funding award stipulations, standards or conditions. The department may terminate, or reduce a contract when there is a reduction of funds by executive order or otherwise.
- *Termination for cause*. If the subrecipient fails to fulfill its obligations under the contract agreement properly or on time, or otherwise violates any provision of the agreement, the board may terminate

the agreement by written notice to the funded program. The notice shall specify the acts or omissions relied on as cause for termination. All finished or unfinished products and services provided by the funded program shall, at the option of the department, become state property. The department shall pay the funded program fair and equitable compensation for satisfactory performance prior to receipt of notice of termination, minus any funds owing to the department, e.g., damages for breach, improperly spent funds.

The newly terminated program within 45 days of the termination, shall supply the department with a financial statement detailing all costs incurred up to the effective date of the termination. [Administrative Rule 61—9.63(13)].

Subrecipients should review the termination language in their contracts.

Subrecipients shall indemnify, and hold harmless the State of Iowa, its officers, agents and employees and any of the state's federal funding sources for:

1. Program's performance or non-performance of a contract entered into, or violation of these rules.
2. Program's activities with subcontractors and all other third parties, or any other act or omission by a subrecipient, its agents, officers, and employees. [Administrative Rule 61—9.64(13)]

# Program and Fiscal Responsibilities

The expectation for accepting an award from the Attorney General's Office is the subrecipient will have in place a system that is adequate for carrying out the administrative/financial and program aspects of the grant award. This includes good communication between the board of directors (if applicable), administrative/financial staff and the program staff. Management should pay particular attention to the budget and expenditure process of the grant award. Fiscal and program staff are responsible for ensuring that the project is implemented successfully. Therefore, it is important that all staff involved with grants are familiar with both the fiscal and programmatic requirements.

The subrecipient must establish and maintain program records to ensure that the direct and subcontracted project activities are in compliance with the executed contract. Such records must be readily available for review.

1. The subrecipient must establish and maintain fiscal controls and procedures that assure federal and/or state funds available for the grant program are properly disbursed.
2. Funds awarded may be expended only for activities and purposes set forth in the executed contract within the approved grant period. The grant period is the start date and end date of the project. It is provided in the contract.
3. Grant funds must be obligated prior to the end date of the grant period. Obligated funds are those funds for which goods or services have been encumbered prior to the last day of the grant period.



# Required Policies and Procedures

[More policies and procedures, and descriptions are in chapter 5.](#)

The grant recipient must establish and implement policies and procedures that address the following areas:

- **Conflict of interest** (see Chapter I. Conflict of Interest)
- Written **Language Access Plan** (LAP) that outlines the organization's policies and procedures for ensuring victims have access to necessary forms of communication, both written and verbal
- Maintaining a **drug-free workplace**
- Restriction of **lobbying** activities as a recipient of federal funds
- **Sexual harassment** policy with a provision that sexual harassment will not be tolerated
- **Whistleblower** protection for those that report abuse, fraud or abuse
- **Nepotism** with regard to hiring and/or supervising relatives of an employee or non-profit board member
- Maintaining a **workplace free of violence**, threats of violence, harassment, intimidation, and other kinds of disruptive behavior
- On-the-job **seat belt and texting while driving** policies and programs for its employees, contractors, and subrecipients when operating agency-owned, rented, or personally owned vehicles
- Tracking, retention and depreciation of **inventory, equipment, property** purchased with grant funds
- **Confidentiality** and the safeguarding of victim records and other information considered sensitive; maintenance of these records; access to these records; procedure of releasing records with victim's consent; and retention/destruction of records. Organization must also document their procedure if there has been a breach, or release of confidential, personally identifying victim information. Please refer to [Chapter VII. Confidentiality & Informed Consent](#).
- **Grievance** procedure for victims, employees and volunteers
- **Personnel Policy** (See [Chapter V. Policies and Procedures, Personnel Policies and Procedures](#))
- **Volunteer** recruitment, selection, screening; training, confidentiality, work rules, supervision, evaluations, grievance procedures and dismissal
- Governance of **Non-Profit Boards** that is consistent with [Non-Profit Organizations and Board of Director's Responsibilities](#), ([Chapter II Post-Award Requirements](#), Iowa law and those of ICADV, IowaCASA or IOVA.
- **Service Delivery**-policies and procedures that outline the guidelines for the delivery of the wide array of **services** provided to victims and their family members
- **Equal Employment Opportunity Plans - Annually** all organizations receiving Department of Justice funding are required to complete and file either an *EEO Plan and Utilization Report* or file the *Verification of EEOP Reporting Requirement* form using the online EEO Reporting system. For more information on EEOP requirements specific to your organization and to access the reporting tool, go to the [Civil Rights EEOP website](#). Once you have complied with the EEOP requirement, you will need to upload documentation into Iowa GVS. [Here are the instructions.](#)
- **Civil Rights Training Certification**- One person from each grant funded organization (the person who is designated the civil rights liaison or similar) must complete Civil Rights Training each grant cycle. The completed [Civil Rights Training Certification](#) form is to be uploaded into Iowa GVS on the organizational details page in the organizational profile. [This is the link to the training videos.](#)

# Budgets and Claims

Subrecipients are required to submit a program/project budget for each year of their contract, (usually Oct to Sept). This budget is part of the applicant, entered into GVS and approved by Victim Assistance must be approved and entered into Iowa GVS prior to claim submission or reimbursement.

Annually, subrecipients are to upload their entire agency budget in the PROFILE section of Iowa GVS on the organization finance page.

If changes to an approved budget are needed, subrecipients must request a budget revision. Budget revisions are requested by submitting a request in Iowa GVS. Step by step instructions for completing budget revisions are provided [here](#). A subrecipient risks costs not being reimbursed if they alter their budget without prior approval. Budget requests will not be accepted within thirty days of the end of the project period without extenuating circumstances and prior approval.

[Claims for Reimbursement](#)  
[Expense Categories](#)  
[Client Assistance](#)  
[Appeals](#)

## Claims for Reimbursement

[Instructions for submitting claims in GVS](#)  
[Claim Summaries](#)

Victim Services funds are reimbursement awards. This means the subrecipient incurs expenses and provides documentation as required for each expense. They then submit a claim for reimbursement Iowa GVS.

All subrecipients may submit either monthly or quarterly claims for reimbursement. Once a choice has been made, the subrecipient remain consistent through the contract period. When required, documentation for each expenditure claimed for reimbursement or as match, is submitted in Iowa GVS. Claims must be submitted by the last day of the month following the expenditure. For example, July claims are due by August 31.

When required, subrecipients must submit [expense summaries](#) for expenses and match with their claims. Criminal justice programs (law enforcement, prosecution and victim witness coordinators) are not required to use expense summaries unless otherwise directed by Victim Assistance. Review the instructions on submitting claims in Iowa GVS for more information.

Click on [Victim Services Expense Summaries](#) to download the expense summaries for victim service programs (Domestic Abuse Comprehensive, Sexual Abuse Comprehensive, Shelter-Based Victim Services, Culturally Specific Programs, VOCA Projects, Statewide Coalitions, Statewide DA/SA Hotline/Chat Line and Homicide/Other Violent Crime programs).

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### Expense Categories:

Each budget and claim for reimbursement form is broken out by types of expenses or expense categories. Below is a list of the expense categories and a detailed chart with examples of the types of items for which an agency can request reimbursement and examples of standard supporting documentation.

- *Payroll for direct services & Payroll for administration, fundraising and prevention*
- *Benefits*
- *Travel for services*

- *In-State Travel & Training*
- *Out of State Travel & Training*
- *Contractual Services*
- *Equipment*
- *Repairs/Maintenance*
- *Rent*
- *Utilities*
- *Communications*
- *Advertising*
- *Supplies*
- *Insurance*
- *Client Assistance*
- *Indirect Costs*

When submitting claims for reimbursement, the subrecipient's assigned financial risk level designation (see [Chapter XXI Subrecipient Monitoring](#)) will determine which expense items will need to include supporting documentation.

All expenses must be allocable, allowable, consistent and reasonable. Victim Assistance has the right to deny an expense if it not allowable under the funding stream, not necessary, not in the approved budget, or deemed to be unreasonable.

[Download an expense category chart.](#)

Expense Category	Examples of Eligible Expenses	Supporting Documentation
Payroll	Payroll of grant funded staff for reimbursement or use as match	<ul style="list-style-type: none"> <li>• Payroll check register, or payroll report to verify gross wages</li> <li>• Payroll stubs showing gross pay and distribution</li> <li>• Payroll spreadsheet showing allocation by fund</li> </ul>
Benefits	FICA, Health, Dental, Vision, Life, Unemployment Insurances; Retirement and Disability	<ul style="list-style-type: none"> <li>• Premium statements or invoices from insurance or retirement providers</li> <li>• Iowa Workforce Development quarterly SUTA reports</li> <li>• Deposits of payroll taxes</li> <li>• Payroll reports reflecting employer costs</li> </ul>
Travel & Training*	Mileage or rental car, meals, lodging, parking, airfare, ground transport, baggage fees, conference registration fees, staff mileage for regular work duties such as transporting victims.	<ul style="list-style-type: none"> <li>• Itemized meal receipts must be included</li> <li>• Itemized hotel statement/invoice</li> <li>• Staff requests for reimbursement</li> <li>• Documentation of travel (mileage record, conference registration form, agenda, etc.)</li> </ul>

Contractual Services <sup>^</sup>	Book-keeping and accounting fees, security services, therapy services, etc.	<ul style="list-style-type: none"> <li>● Travel purpose</li> <li>● Taxi/bus/train receipts</li> <li>● Airline confirmation</li> <li>● Statements or invoices showing the date(s) of service, the total amount owed, the amount paid, and the contract period.</li> <li>● Vendor receipts or invoices for each item</li> <li>● A description of the item purchased</li> </ul>
Equipment	Printers, computers, laptops, scanners, tablets, phones, and other equip used for approved programming	
Repairs/Maintenance	Building & Equipment maintenance (copier, lawn care, etc.)	<ul style="list-style-type: none"> <li>● Vendor receipts or invoices showing the date or dates of service, the total amount owed, and the amount paid, with a copy of the check.</li> <li>● Vendor receipts or invoices showing the rental period &amp; the location address (unless confidential)</li> </ul>
Rent	Business, shelter & outreach offices	<ul style="list-style-type: none"> <li>● Copy of signed contract/lease agreement</li> </ul>
Utilities	Electric, water, waste removal, satellite cable	<ul style="list-style-type: none"> <li>● Statements or invoices showing the usage period &amp; the location address (unless confidential)</li> </ul>
Communications	Cell phone plans, landline services, internet, intercoms, TDD /relay machines/VP systems, etc.	<ul style="list-style-type: none"> <li>● Statements or invoices from provider</li> </ul>

If your victim service program receives more than one funding stream, you must do a payroll summary with your claims for reimbursement.

\* Out of state travel must be requested in advance and approved by your primary grant coordinator.

<sup>^</sup> Audit fees must be pro-rated based on the amount of funds received from each source. If 20% of agency funding comes from one funding source, then only 20% of audit fees can be requested from that funding source.

<sup>^</sup> Equipment purchases must be included in an approved budget. If it is not included, subrecipients should contact their grant coordinator to discuss the requested equipment purchase and then complete a budget revision request via Iowa GVS. Include the estimated purchase price and which fund source you would like to use. All purchases must follow the Procurement Standards located in [Chapter XIV. Procurement of Goods and Services](#).

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## Client Assistance:

The purpose of the client assistance section is to provide specific guidelines about reimbursements for client assistance offered to crime victims with grant funds. Click on the client assistant tab on the [claim expense summary form](#).

Client assistance can be provided with grant funds, to meet the needs of clients. Some common examples of client assistance are: rent, utilities, childcare, groceries/grocery cards, gas cards, relocation/moving expenses, work equipment, public transportation, or any reasonable cost deemed necessary to help a client remain safe and/or to achieve self-sufficiency due to victimization.

Any **unique client need** will be considered on a case by case basis with justification from the agency. If you are not sure if a cost meets the guidelines above, seek prior approval from your grant manager. If prior approval is not sought before paying for a client expense, you run the risk of the expense not being reimbursed.

Grant funds cannot be used to provide victims with cash or credit card type gift cards.

All claims for reimbursement for client assistance must have accompanying receipts or invoices. Each cost should also have a short justification documenting the purpose of the expense if the purpose is not already clear.

Example 1 - If your agency is paying for rent assistance for a client, there must be a signed receipt from a landlord, or agency check copy.

Example 2 - If you provide a victim with a gas card, there must be documentation of the last 4 digits of the card, the amount of the card, and a short explanation of why the card was issued i.e. "transportation to work," or "transportation to medical appointment."

Example 3 - If your agency pays for work equipment or supplies (i.e., work boots) so a client can continue working the form would read "work boots supplied to victim to adequately equip her for return to work duties." Expense amount-\$75, receipt from Wal-Mart attached to the form.

Any store (grocery, gas, etc.) card provided to a victim requires a short Victim Assistance Form to be signed by both the victim and an agency representative outlining the purpose of the cost and acknowledgement of the purpose by the victim. This form should be maintained in the client file.

If there are any questions about what constitutes adequate supporting documentation for an expense, please ask your grant manager.

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## Appeals:

**Appeals Process:** When any part of a claim for reimbursement, or budget revision request is denied subrecipients have the right to appeal.

**Appeal Step 1:** The subrecipient must submit an appeal within 10 business days of receipt of the denial, outlining their rationale for approval. The VSS Administrator has 10 business days to respond to the denial, either upholding, or overturning the original decision.

**The appeal form should be uploaded into Iowa GVS, using the appeal component.** Here are the instructions: 1) An agency administrator logs into Iowa GVS; 2) In the panel named My Opportunities, click

on the word appeal; 3) Click on the words Appeal Information found at the top of the left side navigation panel; 4) select the appropriate appeal type from the dropdown menu and then follow the instructions on the page.

**Appeal Step 2:** In the event the VSS Administrator upholds the denial, the subrecipient may submit an appeal to the Victim Assistance Section Chief who will respond within 10 business days by either upholding, or overturning the VSS Administrator's decision.

**Appeal Step 3:** In some instances the appeal can be brought before the CVA board. The CVA Board determination will constitute final agency action.

During the appeals process, the amount in dispute must remain unspent until a final determination is made. The subrecipient can withdraw an appeal at any point in the appeals process.

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# Organizational Contacts

The Victim Assistance Section has three grant coordinators who are assigned to oversee between 35 and 40 grants each. These grant coordinators are the primary contacts for the subrecipients. They answer grantee questions, provide resources and training. In addition, grant coordinators review the subrecipient's application, budget, budget revision requests, project scope change requests, claims for reimbursement and performance reports.

The Victim Assistance Section has two grant compliance coordinators who are responsible for monitoring, including site monitoring, grant compliance and providing technical assistance.

- Email Contacts

Victim Assistance uses a database to send emails regarding information about contracts, claims, reports, upcoming training, etc. Each agency is responsible for keeping their contacts updated in [Iowa Grants for Victim Services](#).

- Program Staff Updates

Subrecipients are **required** to provide notify their grant coordinator within 30 days of a vacancy of a grant funded position, and/or when there is turnover in a position where payroll or benefits are used as match on VSS funds.

Subrecipients should also report any other changes in key personnel to their grant coordinator via email or through a message in Iowa GVS. If any VSS funded positions remain vacant for 45 days or more, the notification must include the reason for vacancy and a plan for filling the position.

# Non-Profit Board of Directors

As communicated in the "[Iowa Principles and Practices for Charitable Nonprofit Excellence](#)" the governing board of a non-profit organization is the entity ultimately responsible for its overall operation. These guidelines are a valuable resource for Iowa non-profit organizations to observe, promoting useful management practices and public accountability.

The governing board's responsibility is to act as stewards, accountable to the state's government that granted the organization their respective charters, accountable to the federal government that granted tax-exempt status, and ultimately accountable to the public itself. The importance of board governance and expectations of grant funded non-profit agencies is reflected here [Non-Profit Organizations and Board of Director's Responsibilities](#).

It is recommended non-profit board members of agencies complete the [Resource Sharing Project E-Learning Course for Board of Directors](#). This orientation course was created in partnership between the National Network to End Domestic Violence and the National Sexual Assault Coalition Resource Sharing for non-profit board governance to use with board members, executive directors and agency staff. It is recommended new board members complete this training within three months of joining the board. A [certificate of completion](#) for each board member who completes the course should be kept in-house in the grantee's file.

\*\*The Attorney General's Office has the discretion to modify any and all training requirements.

# Required Notifications

Subrecipients must provide written notification to their grant coordinator of the following occurrences:

1. Any change of address for authorized official, project director, or financial director for the grant-funded project.
2. Any lawsuit filed against a grant funded project or program. (Note: Notification of EEOC claims or lawsuits claiming discrimination must follow the procedure outlined in [Chapter XXIV. Discrimination/Complaint Process](#).)
3. Any cessation or interruption of implementation of project activities arising from litigation, loss of staff, or programmatic restructuring
4. Change in project site or location
5. Change in the name of the person responsible for reporting civil rights findings of discrimination
6. Addition of equipment and/or Sensitive Minor Equipment to project budget not previously identified (Note: Sensitive Minor Equipment requires prior approval, see [Chapter XVI. Allowable Costs](#) and [Chapter XVII. Unallowable Costs](#).)
7. Change in e-mail address of project director, financial director, authorized official or any personnel funded by this grant
8. Any change in the subrecipient's banking information that is being used for direct deposit payment of grant funds must be reported. The subrecipient must submit a new Automated Clearing House (ACH) form to their grant manager.
9. In the event of a formal allegation of civil rights discrimination, including those related to employment, subrecipients must immediately notify their grant coordinator within ten (10) days. Subrecipients must report, in writing, the status of any on-going investigations to the AG's Office. A subrecipient may request exemption or modification of this requirement by submitting a written request to their grant coordinator.
10. In the event a federal or state court or a federal or state administrative agency makes an adverse finding of discrimination against a subrecipient agency, after a due-process hearing, on the basis of race, color, national origin, religion, age, sex, or disability the subrecipient agency must send a copy of the finding to their grant coordinator within ten (10) days.
11. Documentation of current unique entity identifier as issued by SAM.gov
12. Receipt of any additional federal grant funds to be used for a currently funded program.
13. Non-acceptance of award-submitted on agency letterhead

Subrecipients must provide written notification to their grant coordinator within **thirty (30)** days from the date of occurrence of any of the following:

1. Change in or temporary absence of the project director or financial director
2. Change in authorized official.
3. Significant changes in grant funded personnel positions which will affect the grant outcomes.

# Subrecipient Monitoring

The VSS Program is guided by two primary purposes:

1. Effective stewardship of state and federal funds for programs that provide service to victims and
2. Provision of quality technical assistance for crime victim program development, fiscal management, and best practices.

CVAD's monitoring plan is in compliance with the Office of Victims of Crime (OVC) requirements that State Administrative Agencies (SAA) develop and implement monitoring plans based on a default of regular desk monitoring, biennial on-site monitoring, audit monitoring and performance report monitoring, of all subawards. Monitoring plans must include a risk assessment plan. The rule, consistent with 2 CFR §200.331 (b), (d) and (e), permits SAAs to develop and implement alternative monitoring plans and further clarifies that SAAs may also implement alternative monitoring timeframes as well.

CVAD staff created and implemented the CVAD risk assessment tool to assess both financial and programmatic risk for CVAD subrecipients. The results from the risk assessments dictates appropriate financial and programmatic monitoring for each agency and/or funded project.

Additional information regarding subrecipient monitoring, frequency of monitoring and the risk assessment tool that is used to assess both financial and programmatic risk for CVAD subrecipients, may be found in [Chapter XXI. Subrecipient Monitoring](#).

# Performance Reports

All subrecipients are required to submit CVAD performance reports. Performance reports are an essential part of communication between programs and CVAD. These required reports provide updates on the progress of the funded programs as well as supply required statistical information. All subrecipients are required to submit CVAD Performance Reports on a bi-annual basis.

Depending on the funding stream(s) awarded, data collection and narrative responses for reports will be completed and submitted in various ways. These will be outlined in each contract.

Failure to submit performance reports in a timely manner can result in disciplinary action up to and including, suspension, reduction, and/or termination of funding.

Additional information on reporting for grant subrecipients may be found in the [Chapter IX. Reporting Requirements](#).

# Chapter 3 Financial Requirements

All subrecipients are required to establish and maintain grant accounting systems and financial records to accurately account for funds awarded to them. As a grant recipient, your agency must have a financial management system in place able to record and report on the receipt, obligation and expenditure of grant funds.

# Financial Management Systems

All subrecipients are required to establish and maintain grant accounting systems and financial records to accurately account for funds awarded to them. As a grant recipient, your agency must have a financial management system in place able to record and report on the receipt, obligation and expenditure of grant funds.

The subrecipient's accounting system must be able to provide accurate, current and complete disclosure of how funds were expended for each funding stream; must be able to identify the Catalog of Federal Domestic Assistance (CFDA) title and number for all federal funds received and must include the following:

- A separate accountability of receipts, expenditures, obligations, and balances for each funding stream.
- Itemized records supporting all grant receipts, expenditures and match contributions in sufficient detail to document the exact nature of fiscal activity.
- Data and information for each expenditure and match contribution with proper reference to a supporting voucher or bill properly approved.
- Maintain payroll authorizations and vouchers.
- Maintain a time and effort reporting system. Time and effort reports should do all of the following:
  - Describe work activity related to the project
  - Match the expenses submitted with the corresponding claims
  - Be signed and dated by both the employee and supervisor
  - Document eligible hours worked on grant activities, itemized by funding stream
  - Document match hours in the same manner as paid staff
- Maintain records supporting charges for fringe benefits.
- Maintain records supporting charges for equipment purchased, rented, donated, or destroyed. See [Chapter XII. Property and Equipment](#) for more information.
- Maintain billing records for consumable supplies (i.e. paper, printing) purchased. See [Chapter X. Purchasing Procedures](#).
- Lease agreements, contracted services, and equipment purchases that adhere to established procurement processes. See [Chapter XIV. Procurement of Goods and Services](#) and [Chapter XV. Procurement of Professional Services](#) for more information.
- Accounting records must also record program income. See [Chapter IV. Program Income Procedures](#) for more information.



# Grant Accountability Requirements

[Record Retention](#)

[Match Requirements](#)

[Indirect Costs](#)

[Program Advances](#)

[Co-mingling of Funds](#)

[Reporting Irregularities](#)

[Supplanting of Funds](#)

[Year-End Closeout](#)

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## Record Retention

All financial records and supporting documents shall be retained by subrecipients for three (3) years following the closure of the agency's most recent audit report. Some records should be kept permanently. Programs should receive guidance from an independent auditor as to what is appropriate for their agency in regards to record retention.

The following are exceptions to the standard record retention period:

- If any litigation, claim, audit, or other action involving the records started before the expiration of the 3-year period, the records must be retained until all issues involving the records have been resolved and final action taken.
- When notified by the Attorney General's Office, the federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
- Records for real property and equipment acquired with federal funds must be retained for 3 years after the final disposition, replacement or transfer.
- When records are transferred to or maintained by the federal awarding agency or pass-through entity, the 3-year retention period requirement is not applicable to the non-federal entity.
- When required for program income earned after the period of performance, the retention period starts from the end of the non-federal entity's fiscal year in which the program income is earned.
- Indirect cost proposals submitted for negotiation must be retained for 3 years from the date of submission.
- Indirect cost proposals not required to be submitted for negotiation must be maintained for 3 years from the end of the fiscal year covered by the proposal.

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## Match Requirements

When a federal grant requires match, it is essentially saying the grant cannot or will not pay 100% of the costs of a project with federal funds. Federal grant funds are used to pay a percentage of the costs of a project and the subrecipient provides the remainder of the costs; this is their match portion. The cost of a project is the total of the federal grant funds plus subrecipients' match. The federal funding sources the Victim Assistance Section administers and their match requirements are noted below. Match can be cash or in-kind and must be from non-federal funds.

Match must be directly related to the project goals and objectives and must be documented in the same manner as grant funded activities.

Subrecipients with a **HIGH** or **MEDIUM** financial risk designation must provide supporting documentation for match with their claims. If the supporting match documentation is not sufficient, Victim Assistance finance team will request additional documentation or clarification, and may determine the match does not meet funding requirements.

Allowable match can be cash or in kind and must meet the following criteria:

1. Restricted to the same use of funds as allowed for the federal funds
2. Applicable to the project, allocable, allowable, reasonable and necessary
3. Be in accordance with generally accepted accounting principles (GAAP)
4. Cannot be used to match another federal grant
5. Cannot be from a federal source
6. Conform to special grant limitations and restrictions (for example, some grants require cash match)
7. Be shown in the approved budget

## **VOCA**

The purpose of program match requirements is to increase the amount of resources available by the subrecipients to serve victims. A 20% cash or in-kind match is required. This match percentage is based on the total cost of each grant funded VOCA project (VOCA award plus match) so the end result is actually a 25% overall match amount (please see calculation examples below). This match must be from non-federal sources, except as provided in the most recent Office of Justice Programs [Financial Guide](#). All funds designated as match are restricted to the same uses as the VOCA funds and must be expended within the contract period. Tribes and Tribal governments are not required to provide match.

Subrecipients with VOCA funds must maintain records that show the source, the amount, and the period during which the match was allocated. The basis for determining the value of personal services, materials, equipment, and space must be documented. Volunteer services must also be documented.

## **Match Waiver For VOCA Awards**

If a grantee anticipates difficulty meeting the match requirement on a VOCA award, subrecipients may submit a request for a match waiver to CVAD. Generally, match waiver requests will be considered at the start of an award period. A partial, or full match waiver may be requested for each one-year increment, up to the full three-year grant cycle. Match waivers are considered by the Program Administrator and/or CVAD Director on a case-by-case basis and approval will be determined based on a well-justified hardship. Approval considerations include:

1. Who is being served by the project? (e.g. priority underserved victims as identified by CVAD in the grant solicitation-veterans, communities of color, elder lowans, limited English proficient (LEP) victims, rural victims, LGBTQIA+ identifying victims, etc.).
2. Practical and/or logistical obstacles to providing match (e.g. public agencies that do not engage in private fundraising and may have limitations on soliciting contributions).
3. Local resource constraints (e.g. recent loss of local fund sources or a rural or impoverished community with limited funding availability).
4. Increases to VOCA funding levels, whereas local funding availability has not increased to the same degree.
5. Past ability to provide match (CVAD generally expects programs to provide a similar amount of match as provided the previous grant year unless the Program can document a significant change in circumstances).
6. Length of time the program has been providing services (e.g. Is this a new project/service?).

To request a match waiver, grantees must send a match waiver justification request on agency letterhead to CVAD via email to the [VSS Administrator](#) containing the following:

1. Legal name of the agency requesting match
2. A brief description of the agency, project and services to be provided
3. A justification explaining the hardship reason for the match waiver request
4. Amounts:
  - a. Total amount of match required based on VOCA fund award
  - b. Total amount of match the agency is able to provide, broken out by in-kind and cash match.
  - c. Amount of match the agency is requesting to be waived
  - d. Amount of match provided in the prior grant year for the same project (if applicable).

5. Time period for which the match waiver request is being made
6. Signatures from both the agency's Executive Director and Board Chairperson

An agency can include more than one match waiver request in the same letter as long as each request is separately detailed and includes the information requested in 2-5 from the list above.

Notification will be made electronically via email, or via the grants management system. The decision of CVAD shall constitute final agency action.

If a grantee with an approved match waiver wishes to renegotiate the terms of the waiver during the project period, an electronic request must be made to CVAD outlining the justification for an amended match waiver (e.g. additional unanticipated hardship during the project period). This request will be considered by the Program Administrator and/or CVAD Director and a decision will be rendered electronically, within one business week.

### **FVPSA**

Subrecipients are required to provide 20% match from non-federal sources for each year of funding. If a grantee is receiving FVPSA funds for the first time, they are required to provide 35% match from non-federal sources for the first year of funding. The match may be cash or in-kind. All funds designated as match are restricted to the same uses as the FVPSA funds and must be expended within the contract period. Tribes and Tribal governments are not required to provide match.

Subrecipients with FVPSA funds must maintain records that show the source, the amount, and the period during which the match was allocated. The basis for determining the value of personal services, materials, equipment, and space must be documented. Volunteer services must also be documented.

### **STOP VAWA**

Governmental agencies are required to provide one-third (33.3%) match from non-federal sources based on the STOP VAWA award amount. Non-profit, nongovernmental victim services programs, tribes and Tribal governments are not required to make match. All funds designated as match are restricted to the same uses as the STOP VAWA funds and must be expended within the contract period.

Subrecipients with STOP VAWA fund must maintain records that show the source, the amount, and the period during which the match was allocated. The basis for determining the value of personal services, materials, equipment, and space must be documented. Volunteer services must also be documented.

### **SASP**

There is no requirement for matching funds for SASP funds.

### **Iowa Domestic Abuse funds and Iowa Sexual Abuse funds**

There is no requirement for matching funds for Iowa Domestic Abuse and/or Iowa Sexual Abuse funds.

### **Match Calculations**

VOCA and FVPSA grant funds will pay for 80% of the total costs of a project. One way to calculate the match amount required for VOCA and FVPSA funds, is to multiply the **grant amount** by 25%. Match must be from non-federal sources. Below are a few match calculation examples:

**Total cost of a FVPSA project is \$125,000. The FVPSA portion is \$100,000. The match is \$25,000.**

\$125,000 (total cost of the project) x 20% = \$25,000 (match)

\$125,000 (total cost of the project) x 80% = \$100,000 (FVPSA)

\$100,000 (FVPSA grant amount) x 25% = \$25,000 (match)

**Total cost of VOCA project is \$187,500. The VOCA portion is \$150,000. The match is \$37,500.**

\$187,500 (total cost of the project) x 20% = \$37,500 (match)

\$187,500 (total cost of the project) x 80% = \$150,000 (VOCA)

\$150,000 (VOCA grant amount) x 25% = \$37,500

To calculate STOP VAWA match requirement, divide the award amount by three (3). As stated above match must be from non-federal sources based on the STOP VAWA award amount. Non-profit, nongovernmental victim services agencies are not required to make match. Below are a few match calculation examples:

\$3,000 STOP VAWA award to a *police department* =  $\$3,000 / 3 = \$1,000$  (match)

\$47,000 STOP VAWA award to a *county prosecutor* =  $\$47,000 / 3 = \$15,667$  (match)

\$21,000 STOP VAWA award to a *nongovernmental victim services agency* = no match required

Because CVAD often combines two or more funding sources into one award it is easier to determine match requirements by multiplying the awarded funding sources times the appropriate percentage.

Award amount = \$250,000 (\$100,000 FVPSA, \$150,000 VOCA)

Match required = \$62,500 ( $\$100,000 \times 25\% + \$150,000 \times 25\%$ )

### **Cash Match**

Cash match (hard) is actual cash spent by the grant recipient for project-related costs. The subrecipient's accounting records must be verifiable and trace back to source documentation including cash receipts journal, general ledgers, deposit tickets, bank statements, copies of checks/donations and documentation the cash match is not from a federal source nor is it being used to match any other grants.

Subrecipients might have cash match from the following sources:

1. state and local units of government
2. private sources
3. program income and the interest earned on the program income as long as it is identified and approved prior to making an award
4. funds appropriated by Congress for the activities of any agency of a Tribal government or the Bureau of Indian Affairs performing law enforcement functions of tribal lands
5. salaries and benefits of staff performing grant work funded with nonfederal dollars
6. otherwise authorized by law

### **In-Kind Match**

In-kind match does not involve cash. In-kind is the value of something received or provided, which is beneficial to the project, but for which no cash exchanges hands. Since it is much easier to raise in-kind match than it is cash match, federal and state guidelines regarding in-kind are strict and require careful documentation. In-kind contributions must be verifiable from grantee records, necessary and reasonable, allowable and not included as a contribution under any other federal award. Examples of allowable in-kind contributions are:

1. equipment
2. project supplies
3. workshop or classroom materials
4. work space
5. volunteers
6. donations of tangible goods, such as clothing, food, toiletries, diapers, furniture, toys

There are a few rules subrecipients must follow when using in-kind donations or services as match:

Volunteer duties must be grant related and grant eligible; fundraising and lobbying are not grant eligible activities and therefore, cannot be used as match. The value of volunteer time must be consistent with the rate of compensation paid for similar work in the organization or labor market. Fringe benefits may be included in the valuation.

The value of donated space may not exceed the fair rental value of comparable space in a privately-owned building in the same locality.

The best way to determine the value of donated tangible goods is to ask the donor to list what was donated

and state the value of the donation in writing with their signature. Donations from a company should be on company letterhead.

**In-kind Match Documentation** must meet the same standards as documentation for other expenditures. Generally, the documentation should be the same as expenses which are paid directly from agency funds (i.e., original receipts).

The in-kind donation cannot be recognized as match **until it is used for the project**.

1. All in-kind matching contributions must be supported by documentation that shows how the value of the contribution was derived. The agency must be able to provide supporting documentation to substantiate the value of in-kind donations.
2. To document the value of a new item, staple the store receipt to an in-kind donation receipt. If the store receipt is not available, include as much information as possible, such as brand name, size, model number, printout from a retail store, on the in-kind receipt. This will help establish the value.
3. To document the value of a used item, use a basis for valuation such as [IRS Publication 561 Determining the Value of Donated Property](#) or the [Valuation Guide for Goodwill Donors](#). Specific itemized information about the donated item will need to be included so that the value can be verified. For example, table is not sufficient. Include information to distinguish different types of donations: kitchen table, coffee table, or end table. Another example is clothing. Itemize and describe the clothing on the in-kind receipt: a woman's shirt, man's dress pants, child's coat, etc.
4. Grant recipients must use a tracking system which shows the source, the amount, the use of these matching funds, as well as the period during which the funds were used in direct support of the project.
5. The grantee must **keep in their grant file** an in-kind receipt which should list, at a minimum, the following items:
  - Agency name
  - Donor name
  - Donor address
  - Date of donation
  - Location of donation
  - Detailed description of item/service
  - Purpose for which contribution was made
  - Value of contribution
  - Basis for valuation (how value was determined)
  - Who made the determination
  - Signature of donor if possible
  - Name of employee accepting the donation
  - Signature of employee accepting the donation

The basis for determining the value of personal services, materials, equipment and space must be documented.

### **Volunteer Tracking**

Volunteer services must be documented and supported by the same methods used by the agency for its own employees, including but not limited to, time, description of the activity, date provided, etc. Grant programs using volunteers as in-kind match must ensure the volunteers are performing allowable activities. CVAD requires volunteer signatures on the volunteer tracking form.

**NOTE:** The Fair Labor Standards Act defines volunteer as "an individual who performs hours of service for a public agency for civic, charitable, or humanitarian reasons without promise, expectation, or receipt of compensation for services rendered..." 29 CFR 553.101(a). "The 1985 Amendments provide that employees may volunteer hours of service to their public employer or agency provided 'such services are not the same type of services which the individual is employed to perform for such public agency.' The phrase 'same type of services' means similar or identical services." 29 CFR 553.103.

Check out CVAD's [match calculation document](#) to help you calculate match.



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## Indirect Costs

Your agency can elect to charge an indirect rate to your CVAD funded grant(s). If you are not familiar with indirect costs, please read the following information.

### Definition

Defined under [200.56 Indirect Costs](#), Indirect (F&A) costs means those costs incurred for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefited, without effort disproportionate to the results achieved.

The Uniform Administrative Requirements allows any non-federal entity that has never received a negotiated indirect cost rate to elect to charge a *de minimis* rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. ***If a non-federal entity chooses to charge the 10% de minimis rate, then the non-federal entity must use this rate consistently for all federal awards until such time as the non-federal entity chooses to negotiate for a rate.***

### 2 CFR 200.412 Classification of Costs

There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the federal award or other final cost objective. Therefore, it is essential that each item of cost incurred for the same purpose be treated consistently in like circumstances either as a direct or an indirect cost in order to avoid possible double-charging of Federal awards.

### What type of indirect base can subrecipients apply the 10% de minimis towards?

2 CFR 200.414(f) states that an eligible non-federal entity which elects to charge the 10% de minimis may only apply the rate to modified total direct costs (MTDC). The MTDC as a base removes "distorting items" (i.e. capital expenditures, contracts, and subgrants). Non-federal entities are allowed to charge the 10% de minimis to the first \$25,000 of its subgrants and contracts. Click [here](#) for more information on indirect costs.

### What this means for your agency?

If your agency has a federally negotiated indirect rate, the agreement must be included as part of your grant application or sent to your grants specialist. If your agency does not have a federally negotiated indirect rate and wishes to use the de minimis rate of 10%, the agency must notify CVAD by completing the [CVAD Indirect Costs Rate Form](#) and include it with the grant application email it to your grants specialist.

Your grant amount will not change if you charge an indirect rate to your project. The calculation to determine direct costs from your award amount is = Total award amount divided by 1.10 (for 10%).

This is an example of how to determine what portion of your award is direct and what portion is indirect

Award amount = \$100,000

Direct amount= \$90,909 ( $\$100,000 / 1.10$ )

Indirect amount = \$9,091 ( $90,909 \times 10\%$ )

Award amount ( $\$90,909 + \$9,091 = \$100,000$ )

Indirect costs are always a percentage of the MTDC. MTDC are the total direct costs minus certain costs that cannot be included when calculating indirect costs, such as capitalized equipment and amounts of subcontracts greater than \$25,000.

Your agency does not have to show documentation for indirect costs when submitting claims, or when CVAD conducts desk audits or on-site financial monitoring.

Indirect costs can be calculated on both grant funds and on claimed match.

Indirect costs charged on grant funds can be waived and used as match. If your program struggles to meet match, it can waive collecting indirect costs and use the value as match.

**Costs are either direct or indirect. Direct costs are specific to a project/grant. If you didn't have the grant/project, you likely wouldn't have the expense. Indirect costs are basically the costs of doing business, also called overhead or administrative costs. Indirect costs are not tied to a specific grant. Agencies, which are 100% funded by CVAD could, in theory, have nearly 100% of their grant funds be direct funds, because almost all funds are allocable to the CVAD grant(s), except fundraising, lobbying and prevention services.**

As stated earlier, there are no universal rules for classifying costs as direct or indirect; however, the costs **must be consistently applied**. A cost can't be a direct cost on one project and an indirect cost on another project. Here are a few examples of each:

Cost Category	Direct or Indirect	Explanation
Salary and benefits of staff who work directly with programs	Direct	The program has the benefit of the person working specifically for the grant. It is easy to allocate time/expenses to the project. If the staff works on more than one project, he/she can allocate the time spent on each project.
Executive director and other administrative staff, such as finance, IT, marketing, HR, etc. salary and benefits	Indirect – generally	It is more difficult to allocate directors' time to various funding sources, since directors are responsible for all aspects of the agency.
Office supplies	Indirect	Office supplies are a part of doing business. It is expected your agency would have sufficient supplies to do business. It is difficult to allocate the cost of pens, paper or toner to specific projects.
Project supplies	Direct	You would not have the expense if you didn't have the project. These are not general office supplies. Project supplies are specific to a project.
Rent, utilities, maintenance, repairs, phone, Internet, audit, insurance	Indirect, unless shelter	Shelter expenses directly benefit the program and the listed expenses (except audit and maybe some insurance) are not shared with other programs. If the shelter went away, these expenses would go away.

**Sample budget using 10% de minimis rate**

Budget Item	CVAD Budget	Match Budget	Explanation
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Personnel costs (salaries and fringe for direct grant work)	\$50,000	\$12,500	All of personnel are included in MTDC)
Travel (directly related to grant)	\$4,000	\$1,000	All travel is included in MTDC
Subcontract for victim services – not a vendor	\$50,000	\$0	Only the first \$25,000 is included MTDC.
Client Assistance	\$25,000	\$0	All client assistance is included in MTDC
<b>Total direct costs</b>	<b>\$129,000</b> (all costs)	<b>\$13,500</b> (all costs)	The total of all direct costs.
MTDC (exclude costs on contractor greater than \$25,000)	<b>\$104,000</b> (\$129,000 minus \$25,000. You can charge indirect costs on the first \$25,000 of a contract)	<b>\$13,500</b> (same as above since there are no costs excluded)	MTDC (modified total direct costs) = total direct costs minus excluded costs.
Indirect rate 10% of MTDC	\$10,400	\$1,350	\$104,000 x 10% CVAD \$13,500 x 10% Match
<b>Total budget</b>	<b>\$139,400</b> <b>(\$129,000+\$10,400)</b>	<b>\$14,850</b> <b>(\$13,500+\$1,350)</b>	\$139,400 = total direct costs + indirect costs (CVAD budget) \$14,850 = total direct costs + indirect (match budget)

In the example above, we only included costs directly allocated to grant activities. Any costs not easily allocated to grant activities as office supplies, utilities, toner, executive director salary/benefits, telephone/Internet or maintenance/repairs are often included as part of the indirect costs.

You can include the value of indirect costs on your match budget. In the budget example above, the agency anticipates claiming \$1,350 of indirect costs to meet their match requirement.

For this purpose, subcontractors are associated with providing specific program needs, vendors provide general services and are not associated with a grant program i.e., copier, maintenance.

**Example of a claim (simplified) using indirect costs:**

Budget Item	Monthly claim	Match Budget	Explanation
Personnel costs	5293.49	1323.37	Actual costs divided between grant and match

Travel		519.23	129.8	Actual costs divided between grant and match
Contract expense		49375	0	Actual contract costs
Client Assistance		5000	0	Actual costs
Total direct costs	\$60,187.72 (all costs)		\$1,453.17 (all costs)	The total of all direct expenses
MTDC (exclude costs on contractor greater than \$25,000)	\$35,812.72 (You can charge indirect costs on the first \$25,000 of a contract)		\$1,453.17 (same as above since there are no costs excluded)	MTDC – excludes contract costs more than \$25,000 \$35,812.72 x 10% CVAD
Indirect rate 10% of MTDC		3581.27	145.31	\$1,453.17 x 10% Match
Total Claim	\$63,698.99 (\$60,187.72+3,581.27)		\$1,598.48 (\$1,453.17+\$145.31)	For this claim the agency contributed \$1,598.48 in match.

In the above example, the claim follows the budget. Actual costs that will be charged to the grant (reimbursed) and credited to match is what is submitted.

If the agency decides to waive collecting indirect costs (not be reimbursed for them) CVAD would reimburse only the total direct costs (\$60,187.72) and \$3,581.27 could shift to the match column. This is a good option for an agency who typically struggles to meet match. The grant amount won't change. The budget will only include direct costs and your match budget will include waived indirect costs from the grant budget. If you do not struggle to meet match, using waived indirect as match is not something likely to be considered.

Finally - If an agency chooses to use an indirect rate, it must be used consistently for all their programs. Once a cost is considered an indirect cost, it can't also be a direct cost. Your agency does not have to apply for the de minimis rate. Your agency does not have to provide backup documentation for indirect costs. Indirect costs, once reimbursed to your agency are generally unrestricted funds.

Please email [VSS Administrator](#) or call with questions 515-725-4130.

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## Program Advances

The Iowa Attorney General's Office, Victim Services Support Program offers, on a limited basis, the opportunity for a funded agency to apply for, and receive, advance grant funds. Advance grant funds are provided to funded agencies or programs in advance of their first claim for reimbursement. The purpose of advance funds is to assist programs with limited operating funds to pay for essential expenses, such as

payroll.

### **Application for advance funds**

An agency wishing to apply for advanced funds must send an email to its assigned grant manager. The email request for an advance in funding must include the following items: 1) name of agency, including pertinent contact information for the executive director and the fiscal director; 2) name/title of program; 3) a formal request for advance funding, detail the need for the advance and why the agency/program would endure a hardship of the advanced were not funded; and 4) an agency budget and most recent audit.

### **Advance Claim Voucher**

The agency must complete the [advance claim voucher form](#).

### **How advance funds are paid back**

Subrecipients submit regularly claims, (usually monthly) and are paid on a reimbursement basis for actual funds spent. Funds advanced to an agency are deducted from the final claim.

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## **Co-mingling of Funds**

Neither the DOJ Financial Guide nor the Uniform Requirements (2 CFR 200) require the physical separation of cash deposits; however, all recipients of grant funds must ensure agency funds and federal funds are accounted for separately. The accounting systems of all grant recipients must ensure that:

1. Agency funds are not commingled with funds from other federal agencies.
2. Commingling funds on either a program-by-program basis or project-by-project basis are prohibited.
3. Funds specifically budgeted and/or received for one project may not be used to support another. The grant recipient must establish a system to provide adequate fund accountability for each project.

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## **Reporting Irregularities or Fraud**

If you know about waste, fraud, abuse, conflict of interest, bribery, gratuity, or other similar misconduct, or whistleblower reprisal relating to an employee, program, contract, or grant you may report it to the Attorney General's Office.

Office of the Attorney General of Iowa  
Victim Assistance Section  
Lucas State Office Building  
321 East 12th Street  
Des Moines, IA 50319

Phone: 515-281-5044  
Toll-Free: 800-373-5044  
FAX: 515-281-8199

Fraud, waste or abuse claims involving federal funds administered by the The Attorney General's Office must adhere to the following regulations. The grant recipient must promptly refer to the DOJ Office of Inspector General any credible evidence that a principal, employee, agent, contractor, subgrantee, subcontractor, or other person has either:

1. Submitted a false claim for grant funds under the False Claims Act; or
2. Committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct involving grant funds.

Potential fraud, waste, abuse, or misconduct should be reported to the OIG.

**Mail:**

Office of the Inspector General  
U.S. Department of Justice  
Investigations Division  
950 Pennsylvania Avenue, N.W.  
Room 4706  
Washington, DC 20530

**Email:**

[oig.hotline@usdoj.gov](mailto:oig.hotline@usdoj.gov)

**Hotline:**

(800) 869-4499 - contact information in English and Spanish

**Hotline fax:**

(202) 616-9881

For additional information, please visit the [DOJ OIG website](#).

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## Supplanting of Funds

Federal funds must be used to supplement existing funds for program activities and not replace those funds, which have been appropriated for the same purpose. Potential supplanting will be the subject of application review, as well as pre-award review, post-award monitoring, and audit. If there is a potential presence of supplanting, the grant recipient will be required to supply documentation demonstrating the reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds.

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## Year-End Closeouts

Subrecipients have 30 days after the end date of the grant period to submit their final claim. It is recommended subrecipients start this process once all monies have been obligated. This will assist in accurate reporting of financial information on the final claim.

Any unspent funds at the end of the contract period will revert to CVAD unless funding requirements, rules, or law prohibit the funds from being spent beyond the contract time frame.

Costs reimbursed will not exceed the approved budget.

- a. Final claim: The final claim is to be submitted within 30 days after the end of the subgrant period. The final claim can include all allowable expenses from the entire subgrant period as long as the expenses were not previously requested.
- b. All match requirements must be met by the end of the subgrant period and submitted with the final claim if not submitted prior to the final claim.
- c. Final Performance Report: This report should be submitted within 45 days from the end of the subgrant period. The final claim will not be paid until receipt of this report.
- d. Equipment with a per unit fair market value of \$5,000 or less may be retained, sold or otherwise disposed of with no further obligation to The Attorney General's Office. For equipment with a fair market value greater \$5,000 contact your grant coordinator for additional instructions.

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## Audits

Organizations expending \$750,000 or more in federal funds are subject to audit requirements as required by Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards*.

Organizations expending less than \$750,000 in federal funds during the entity's fiscal year are recommended to have an audit conducted in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in Government Auditing Standards, issued by the Comptroller General of the United States, also known as Yellow Book Audit.

All grant recipients will provide for an independent audit report on an annual basis as required by Office of Management and Budget (OMB), Uniform Administrative Requirements and the OCFO Financial Guide. It will comply with the organizational audit requirements and further understands and agrees that funds may be withheld, or other related requirements may be imposed, if outstanding audit issues (if any) are not satisfactory and promptly addressed as further described in the current edition of the OVW Financial Grants Management Guide and the OCFO Financial Guide.

The grant recipient must comply with all federal and state grant audit requirements including The Single Audit Act Amendments of 1996; 2 CFR Part 200, as amended; and any other applicable law or regulation, and any amendment to such other applicable law or regulation which may be enacted or promulgated by the federal government.

If the grant recipient is a local government or non-profit organization and expends \$750,000 or more in federal awards (from all sources including pass-through awards) in the organization fiscal year (12-month turnaround reporting period), the grant recipient is required to provide the appropriate single or program specific audit in accordance with the provisions outlined in 2 CFR Part 200.501.

If the grant recipient expends total federal awards of less than the threshold established in 2 CFR 200.501, it is exempt from federal audit requirements for that year, but records must be available for review or audit by appropriate officials (or designees) of the federal agency, State Agency and Government Accountability Office (GAO).

Audits are due the earlier of 30 days after the receipt of the auditor's reports or nine months after the end of the audit period. For example, audits for period ending June 30th would be due no later than March 31st and audits for period ending September 30th would be due no later than June 30th.

Submit audits electronically to fiscal department by e-mailing to [Kristi.hill@ag.iowa.gov](mailto:Kristi.hill@ag.iowa.gov). Electronic copy of audit is preferred. However, you may submit a hard copy to Victim Assistance Section, Finance Department, Lucas State Office Building, 321 East 12th Street, Des Moines, IA 50319.

Audits should also be uploaded in Grants for Victim Services (GVS) under Organization Finance, question #14.

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# Chapter 4 Program Income Procedures

Grantees must use any program income to supplement allowable program costs. Program income must be tracked in accordance with federal financial guidelines. Grantees should expend program income as soon as possible, unless there are special circumstances. If program income is not expended by a subrecipient, the subrecipient may have to refund the program income to the Federal government.

# Program Income Defined

Program income, as described in [28 CFR, Part 66.25 \(PDF\)](#), means gross income received by the subrecipient directly generated by a grant supported activity, or earned only as a result of the grant agreement during the grant period. During the grant period means the time between the effective date of the award and the ending date of the award.

## **Examples of Program Income**

Program income includes but is not limited to income from fees for services performed, the use or rental of real or personal property acquired under Federal awards, the sale of commodities or items fabricated under a Federal award, license fees and royalties on patents and copyrights. Program income does not include rebates, credits, discounts, and interest earned on any of them.



# Program Income Disposition Requirements

[Sale of Property](#)

[Royalties](#)

[Attorney Fees and Costs](#)

[Registration/Tuition Fees](#)

## **Sale of Property**

In the case of real property purchased in part with federal funds, the subrecipient may be permitted to retain title upon compensating the Attorney General's Office for its fair share of the property. The federal share of the property shall be computed by applying the grant specific percentage of the federal participation in the total cost of the project for which the project was acquired to the current fair market value of the property.

## **Royalties**

Subrecipients shall retain all royalties received from copyrights or other works developed under projects or from patents and inventions, unless the terms and conditions of the project provide otherwise, or a specific agreement governing such royalties has been negotiated between the Attorney General's Office and the subrecipient.

## **Attorney's Fees & Costs**

Income received pursuant to a court-ordered award of attorney's fees or costs, which is received subsequent to completion of the project, is program income to the extent that it represents a reimbursement for attorney's fees and costs originally paid under the award. Disposition of such program income is subject to the restrictions on the use of program income set forth in the grant.

## **Registration/Tuition Fees**

These types of program income shall be treated in accordance with disposition instructions set forth in the project's terms and conditions.

Program income, with prior approval may be retained by the entity earning the program income or used by the Attorney General's Office for the purpose that furthers the objectives of the legislation under which the grant was made.

# Accounting for Program Income

All income generated as a direct result of an agency-funded project shall be deemed program income. Program income must be used for the purposes and under the conditions applicable to the grant. If program income is earned, it must be accounted for up to the same ratio of federal participation as funded in the project or program.

Unless specified, program income should be used as earned and expended as soon as possible. If the cost is allowable under the federal grant program, then the cost would be allowable using program income.

**Current program income information should be reported on the [Project/Program Income Report](#).**

This report is due quarterly due 15 days after the end of each calendar quarter; final due 30 days after the end of the grant award period or when the required percentage of earned project income is expended, whichever is later.

If there is no special condition on the grant concerning the accounting for program income after the funding period, then program income can be used at the discretion of the subrecipient.

Unless told otherwise, there are no requirements on the disposition of program income earned after the end of the period of performance of the award.

# Chapter 5 Policies and Procedures

Subrecipients of Crime Victim Assistance Division (CVAD) funds are required to have certain policies and procedures in place to adhere to state and federal statute and rule, as well as to ensure best practices for grant management and victim services delivery.

# Personnel Policies and Procedures

Agency records and accounting systems must include the following components for personnel approved in the project's budget.

[Personnel Policies and Procedures](#)

[Personnel Costs](#)

[Personnel Qualifications](#)

[Personnel File Requirements](#)

[Personnel Paid 100% from a single federal award](#)

[Personnel Change Notification](#)

[Staff Vacancies](#)

[Subcontracted Staff](#)

## Personnel Policies and Procedures

The subrecipient must have written personnel policies and procedures that address:

1. Work hours
2. Holidays, vacations, sick leave, and other leave time – policy should include payout directives in the event a staff member quits, is laid off, or is terminated.
3. Overtime pay and compensatory time - Overtime pay must be authorized in the approved budget, or prior written approval must be obtained from CVAD before any overtime is worked.
4. Hazard pay, if applicable
5. Remote work
6. Administrative leave
7. Termination
8. Qualifications
9. Written job descriptions
10. Training received
11. Supervision of staff
12. Time and activity tracking of staff
13. Duplication of pay – Agency must have a policy ensuring employees working on the grant-funded project are not receiving duplicate compensation (i.e. being paid with grant funds while receiving a salary for the same period from another source)
14. Background checks - Agency must have a policy for background checks and adhere to the policy. At a minimum, this policy must include which agency positions require a background check and the type of check performed.
15. Seat belt usage in accordance with Iowa law

Additional requirements for background check are outlined below:

Screening of staff and volunteers to ensure that children and vulnerable adults are protected. Individuals in contact with children and vulnerable adults must have background check/screening information collected from the following:

- National Background Check or a private National Criminal History Check/Screening provider, and
- [Sex Offender Registry](#) search.
- All background checks otherwise required by state or federal law, or required for the programs/services provided by the sub-recipient (including fingerprint background checks through the IA Department of Public Safety, if required—see below).

Individuals transporting clients must have the following information reviewed:

- Driving Record Check
- Proof of Liability Insurance

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## Personnel Costs

Time and Attendance Records – Accurate time and attendance records are required to be maintained for all personnel whose salary is charged to the project. These records should minimally contain the following information:

- Date (day, month and year)
- Employee's name
- Position title
- Total daily hours charged to the project
- Activities related to the project
- Employee's signature
- Project director or supervisor's signature
- Funding source (Federal grant # when applicable)

The subrecipient may use any form that provides the above information.

\*One-time salary supplements or bonuses, including severance provisions, may not be paid with federal and/or state funds. Personnel working for more than one project must have sufficient records to show an accurate accounting of each project which have hours recorded to them. This can usually be accomplished by having personnel keep a detailed log of their activities for each project as noted above.

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## Personnel Qualifications

Agencies must employ qualified individuals for the positions in which they are employed. At a minimum, agencies should obtain verification of education, training and/or any certifications prior to employment. Additionally, agencies should review prior work experience and contact references. It is an expectation that any employee being hired into a specialty position (i.e. an attorney, or a forensic nurse examiner), has the appropriate certification(s), or education to ensure competency.

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## Personnel File Requirements

Agencies are required to maintain personnel files for all staff funded with CVAD grant funds, as well as all volunteers providing direct victim services to clients. These files should minimally contain the following information:

- Documentation of verified character/employment references
- An agency application or resume'
- A signed release of information granting the organization permission to obtain a background check and to conduct reference checks
- Job description
- Documentation of training/certification received such as the topic, presenter, length of training, dates.
- Documentation of minimum job qualifications if not evident from application or resume
- Documentation of background checks according to agency policy.

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## Personnel Paid 100% from a single federal award

In order to comply with federal regulations, grant funded employees (and those used for match) are required to track and allocate time worked on grant activities. Subrecipients with employees who are paid 100% from a single federal grant source, for at least six months, are exempt from tracking their time and activities if those employees' personnel files include their job description and the signed certification form. All activities performed by these employees must be allowable under the funding source from which they are paid.

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## Personnel Change Notification

Subrecipients must update their organizational PROFILE in Iowa GVS immediately when any of the following occur. Subrecipients must also email their grant coordinator to advise of the changes.

### 1. Contact information changes

- Any change of address for authorized official, project director, or financial director for the grant-funded project
- Change in e-mail address of project director, financial director, authorized official or any personnel funded by this grant.

### 2. Personnel Changes

- a. Any cessation or interruption of implementation of project activities arising from litigation, loss of staff, or programmatic restructuring
- b. Change in or temporary absence of the Project Director or Financial Director
- c. Change in Authorized Official
- d. Change in grant funded personnel positions
- e. Temporary staff changes should also be reported
- f. Any position paid 100% by a single federal source (notify every 6 months)

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## Staff Vacancies

Vacancies in all grant funded positions MUST be reported in writing (e- mail, fax, or mail) to CVAD within 30 days of the vacancy. All grant funded vacant positions MUST be filled within 45 days of the vacancy. Failure to abide by this requirement may result in the agency losing the vacant position(s). If the position(s) is/are not filled within 45 days, the subrecipient must notify CVAD, provide a reason for the delay and explain how the program is providing services while the position is vacant. Once the vacant position(s) is filled the subrecipient MUST update the budget details form by submitting a name change via an amendment/revision in Iowa GVS by following [these instructions](#).

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## Subcontracted Staff

For policies concerning Subcontracted Staff see [Chapter 15 Procurement of Professional Services](#).

For specific volunteer requirements related to match see [Chapter 3 Financial Requirements, A. Grant Requirements, c. Match, 3 Volunteer](#).

# Agency Policies and Procedures

The subrecipient must have written policies and procedures that address:

## 1. **Guidelines for service delivery:**

Policy must include policies and procedures to guide the administration of services to victims (counseling, legal services, shelter, therapy, etc.)

~Policy must describe the standard and components/activities in each of the services

~For more information on service standards, see [CVAD Grant Manual, chapter 8](#).

## 2. **Client confidentiality & security of confidential information:**

This requirement applies to victim services organizations, including VOCA Projects

Policy must include:

~How the organization will protect clients' confidentiality and the responsibility of staff, volunteers, and board members to protect client confidentiality;

~How the organization secures victim records and who has access to the client records;

~The requirement that confidentiality statements must be signed by all staff, volunteers, interns, board members;

~For more information on confidentiality, see [CVAD Grant Manual, chapter 7](#).

## 3. **Informed consent & release of client information:**

This requirement applies to victim services organizations, including VOCA Projects

Policy must include:

~The use of a release of information form for the organization to obtain consent from victims to release their information.

For more information on releases, see [CVAD Grant Manual, chapter 7](#).

## 4. **Breach of personally identifying information:**

~Requirement to report an actual or imminent breach of personally identifiable information (PII) to CVAD or to an OJP program manager **no later than 24 hours** after an occurrence of an actual breach, or the detection of an imminent breach. [This is a requirement of certified assurances.](#)

~For more information on breaching PII, see [CVAD Grant Manual, chapter 7](#).

## 5. **Volunteer policies/manual & volunteer tracking form:**

All recipients of **VOCA funds** are required to have at least 1 **direct service** volunteer for 1 hour for each grant cycle. Please contact your grant manager if you need assistance volunteer use or if a waiver is needed

Policies and procedures must include:

~How your organization recruits, selects, screens, trains and supervises volunteers

~How volunteer hours are documented; your **volunteer tracking form** should include: volunteer name and signature, date and number of hours volunteered, and a brief description of the volunteer work. Optional items on the checklist are check box for direct or services and a total line to tabulate hours.

~How **volunteer files** are maintained to include: job description, application or resume, reference checks, signed confidentiality form, background check showing child abuse and criminal background checks for volunteers providing direct services, training (if applicable), volunteer evaluations (if applicable), signed sexual harassment policy, driving record check and proof of liability insurance if transporting clients

For more information on volunteer requirements, see CVAD Grants Manual, chapter 5, or use the search function

## 6. **Grievance policy and procedures (including alleged civil rights violations):**

Policy and procedures must include:

~How **victims, employees, and volunteers** file grievances or complaints regarding potential violations of a victim service program's service standards, contractual stipulations and /or certified assurances.

~The stipulation that if someone is filing a complaint about a CVAD funded activity, they use the online complaint form found in the [CVAD Grant Manual, chapter 24](#).



~Complainants must also be informed they may file complaints directly with the Office of Civil Right or the [Iowa Civil Rights Commission](#):

**U.S. Department of Justice**,

Office of Justice Programs  
Office for Civil Rights (OCR)  
810 7th Street NW  
Washington, DC 20531

~The procedures for filing discrimination complaints are to include the following: (1) a process for accepting and investigating complaints within the organization (2) process for referring the complaint to an appropriate investigating entity (the referral organization should be identified in the policy and/or procedure) in the event that the grantee does not have the capacity to investigate discrimination complaints; (3) Notice to employees that they may also refer program participants to the OCR, CVAD or Iowa Civil Rights Commission (ICRC) in the event that the program participant does not want to file directly with the organization/grantee and (4) Contact information for the aforementioned agencies (OCR, CVAD or ICRC) should be included in procedure/policy.  
For more information on policies see [chapter 2](#) of the CVAD grant manual

**7. Nondiscrimination policy:**

Policy and procedures must include:

~Notification to employees, and victims that the organization does not discriminate on the basis of race, color, national origin, religion, sex disability, or age; that it does not retaliate against a person who files a discrimination complaint or lawsuit, who complains about discrimination; or who participates in a discrimination proceeding, such as being a witness in a complaint investigation or lawsuit.

~Written policies and procedures advising how to file complaints or allegations of discrimination must be given to employees and clients.

~Grievance procedures that incorporate due process standards and provide for the prompt and equitable resolution of complaints alleging a violation of the DOJ regulations implementing Section 504 of the Rehabilitation Act of 1973, found at [28 C.F.R. Part 42 G](#), which prohibits discrimination on the basis of disability in employment practices and the delivery of services.

~*Designation of responsible employee.* A recipient employing fifty or more persons and receiving Federal financial assistance from the Department of \$25,000 or more shall designate at least one person to coordinate compliance with this subpart.

~All clients, customers, program participants, employees, job applicants, or consumers of CVAD, or of CVAD's subrecipients have the right to participate in programs and activities operated by CVAD or its subrecipients regardless of race, color, religion, national origin, sex, age, disability. In addition, subrecipients of Violence Against Women Act (VAWA) grants are prohibited from discriminating on the basis of sexual orientation or gender identity or expression.

~Adverse findings of a civil rights complaint must be sent to CVAD.

~Notification services must be provided regardless of religious beliefs.

~If an **organization conducts explicitly religious activities**, that organization must have a mechanism in place to notify program participants that it does not: (1) discriminate on the basis of religion in the delivery of services. This can be part of the intake packet, on a brochure, on the subrecipient's website, etc.; (2) will make reasonable efforts to refer clients who object to the religious character of an organization to another agency for similar services and keep a record of the requests for an alternate provider; and (3) If the organization has hiring practices favoring co-religionists, they should have sent a Certificate of Exemption to CVAD.

**8. Drug-free workplace:**

All grantees must have a drug-free workplace policy and procedures which include:

~Publishing a statement that notifies employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the workplace and those actions will be taken against employees for violation of the prohibition

~Discourages alcohol and drug abuse and encourages treatment

~Acknowledges that drug and alcohol dependencies are health problems and encourages those with alcohol and drug abuse issues to seek treatment

~A drug-free awareness program

~Requires employees to notify the organization in writing of a criminal drug statute conviction occurring in the workplace no later than five calendar days after conviction **and** requires the organization to inform CVAD within 10 calendar days after the conviction of an employee of the organization, of such conviction

~Specify actions the organization can take with an employee who has received a criminal drug statute conviction

For more information on the federal requirements of a drug free workplace, click [here](#).

**9. Non-Violence in the workplace:**

All grantees must have a non-violence in the workplace policy and procedures which includes:

~A statement proclaiming the organization will maintain a workplace environment free from threats and acts of violence

~A lists of prohibited behaviors, such as: causing physical injury to another person; acting in an aggressive or hostile manner that creates fear of injury to someone; intentionally damaging property of the organization or of another employee; possessing a weapon during grant-related activities (not applicable to law enforcement).

~How someone reports workplace violence, and if the report can be made anonymously

~What steps are taken to address reports of workplace violence

**10. Policy banning employees, contractors/subcontractors and volunteers from texting while driving:**

All grantees must have an on-the-job policy banning employees, contractors/subcontractors and volunteers from texting while driving an organization-owned, rented or personally owned vehicle. The policy should also include workplace safety information and other awareness activities to decrease crashes caused by distracted driving.

**11. Policy requiring employees, contractors/subcontractors and volunteers requiring the use of seatbelts:**

All grantees must have an on-the-job seatbelt policy which requires employees, volunteers and contractors to use their seatbelts when driving or riding in an organization-owned, rented or personally owned vehicles.

**12. Records retention:**

All grantees must have a record retention policy to include:

~How long all closed and inactive client files shall be retained

~How closed and inactive files are destroyed

~How long financial and program records and supporting documents concerning CVAD funded projects shall be retained

~Who has access to grant-related books, documents, papers or other records associated with CVAD funding

For retention requirements, see [CVAD Grant Manual on record retention](#).

**13. Nepotism:**

All grantees must have a policy addressing hiring relatives of an employee or board member.

**14. Conflict of Interest:**

All grantees must have a conflict of interest policy which includes:

~An explanation, or definition of what qualifies as a conflict of interest such as “a transaction or arrangement that could benefit an officer, director, or employee?”

~Prohibition of actions that might result in, or create the appearance of conflict of interest, such as: using an official position for private gain or giving preferential treatment to any person

~ The requirement board members and staff are to be excused from voting or participating in workplace decisions when a conflict or an appearance of a conflict exists

For information on conflict of interest see [CVAD Grant Manual, chapter 1](#).

**15. Lobbying activities (restriction of):**

All grantees must have a policy on lobbying. Lobbying is prohibited with federal funds.

Lobbying requirements and restrictions are detailed in [CVAD Grant Manual, chapter 17](#).

- 16. Tracking, retention and depreciation of inventory, equipment and property:**  
All grantees must have a policy on tracking equipment and property. For CVAD grants, equipment purchased prior to the 2022 grant year must be recorded on the [inventory reporting form](#) and emailed to your grant manager. Equipment purchased during the 2022 grant year and after will be recorded during the claim process via Iowa Grants for Victim Services. Organizations should have a policy and procedures to track and record all equipment regardless of the funding source. See [CVAD Grant Manual, chapter 12](#) for more information.
- 17. Accounting policies:**  
All grantees must have accounting policies regarding the receipt and disbursement of funds, purchasing and payment of expenditures and the requirement of appropriate segregation of duties. Additionally, the policies should include how the organization separates and accounts for each funding source (no co-mingling of funds); the role of a payroll service if appropriate, use of an auditor, requirement the audit be forwarded to CVAD. See [CVAD Grant Manual, chapter 3](#) for more accounting requirements.
- 18. Purchasing:**  
All grantees must have policies and procedures on purchasing. See [CVAD Grant Manual, chapter 10](#) on purchasing.
- 19. Travel**  
All grantees must have policies addressing travel for staff and volunteers when providing services and when traveling to trainings, conferences or meetings; in and out of state. [CVAD Grant Manual, chapter 11](#) provides CVAD and the State of Iowa travel rules.
- 20. Client Assistance:**  
Grantees who provide client assistance must have a policy describing in detail how client assistance is distributed.
- 21. Gift Card:**  
Grantees who use gift cards must have a policy describing who is authorized to purchase gift cards, how gift cards are logged (with or without a client number), stored and inventoried, who has access to them, and the process for distributing them.
- 22. Language access plan:**  
Grantees must have written procedures that outline the organization's policies and procedures for ensuring victims have access to necessary forms of communication, both written and verbal.
- 23. Determination of suitability to interact with participating minors:**  
The recipient, and any subrecipient at any tier, must **make determinations of suitability before certain individuals may interact with participating minors**. This requirement applies regardless of an individual's employment status. One of the special conditions included in all certified assurances is the determination of suitability to interact with participating minors. In summary, your agency must determine if covered individuals are suitable to interact with participating minors. [OVW award condition document](#). This [document](#) provides the definition of this award condition, clarification from CVAD, resources and additional information regarding working with minors.
- 24. Employment eligibility verification for hiring under the award:**  
Your policies must ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the subrecipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1). For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify ([www.e-verify.gov](http://www.e-verify.gov)), provided an appropriate person authorized to act on behalf of the subrecipient uses E-Verify (and follows the proper E-Verify procedures, including in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.
- 25. Sexual harassment and the response to workplace-related incidents of sexual misconduct:**

A sexual harassment policy is required for all grantees to include sexual harassment can include:

- ~Offensive remarks about a person's sex, gender, gender presentation, or sexual orientation
- ~Ongoing comments or teasing of a sexual nature that make someone uncomfortable
- ~Unwelcome sexual advances
- ~Making sexual favors a condition of employment, promotion, or work assignment ("quid pro quo" harassment)
- ~Touching another person in a sexual way
- ~Exposing someone to sexually explicit materials without their consent

The policy also needs to include:

- ~The process for filing a grievance of sexual harassment by an employee, client, victim, volunteer or board member
- ~What the process for filing a grievance looks like when the alleged perpetrator is a supervisor, administrator or director
- ~The requirement for current and new staff and volunteers to sign an acknowledgement form that they have reviewed and understand the sexual harassment policy

**OVW funded grantees (STOP VAWA and SASP)** must adhere to the [policy for response to workplace-related incidents of sexual misconduct](#), domestic violence, and dating violence - See also [CVAD certified assurances](#). For OVW grant funded activities, this policy must address the following:

1) allegations of workplace-related incidents of sexual misconduct, domestic violence, and dating violence by an employee, volunteer, consultant, or contractor;

2) workplace supports for employees, volunteers, consultants, or contractors who are victims of sexual misconduct, domestic violence, or dating violence; and

3) adjudications that will result in an employee, volunteer, contractor, or consultant being prohibited from occupying positions that could undermine the ability of the recipient or subrecipient to carry out the grant funded project, such as positions working with victims and other vulnerable populations. A policy may provide that certain adjudications do not prohibit an individual from occupying such a position but must include standards for granting such an exemption for an individual.

# Chapter 6 Victim Advocate Certification and Training Requirements

The Iowa Victim Advocate Certification Program establishes certification for individuals providing victim services in the State of Iowa. This designation provides victim/counselor privilege (confidentiality) only if the advocate works/volunteers for a crime victim center.

# Victim Counselor Definition in Iowa Code

As stated in the Iowa Code [915.20A](#), a “Victim counselor means a person who is engaged in a crime victim center, is certified as a counselor by the crime victim center, and is under the control of a direct services supervisor of a crime victim center, whose primary purpose is the rendering of advice, counseling, and assistance to victims of crime. To qualify as a “victim counselor” under this section, the person must also have completed at least twenty hours of training provided by the center in which the person is engaged, by the Iowa Organization of Victim Assistance (IOVA), by the Iowa Coalition Against Sexual Assault (Iowa CASA), or by the Iowa Coalition Against Domestic Violence (ICADV), which shall include but not be limited to, the dynamics of victimization, substantive laws relating to violent crime, sexual assault, and domestic violence, crisis intervention techniques, communication skills, working with diverse populations, an overview of the state criminal justice system, information regarding pertinent hospital procedures, and information regarding state and community resources for victims of crime.”

All CVAD domestic abuse, sexual abuse, shelter and survivors of homicide comprehensive programs are required to obtain and maintain victim counselor status by participating in victim counselor training provided by the Iowa Coalition Against Domestic Violence, or the Iowa Coalition Against Sexual Assault, or a like program approved by one of these coalitions or CVAD.

**Victim Counselor Status:** Anyone, who on behalf of this program, engages in any of the following activities must obtain and maintain victim counselor status: provides direct or indirect services to victims, has access to confidential client data, supervises direct service staff or volunteers or, interacts with victims on the telephone or in person, or provides any other related service where victims’ identifying information is available.

**Advocate Certification:** Everyone who provides direct victim advocacy services and supervisors of those providing direct services must, in addition to maintaining victim counselor status, also obtain and maintain the specific advocate certification respective to their field of work. This includes, but is not limited to: advocates, supervisors, volunteers who interact with clients and/or have access to confidential information, and executive directors.

If an employee or a volunteer, who is required to be certified, cannot obtain or maintain certification, or if certification is subsequently terminated by one of the coalitions listed above, the staff member or volunteer may not work or volunteer for any CVAD funded program. Failure to adhere to this assurance will put all of the agency’s CVAD funding in jeopardy. This certified assurance applies to all persons engaged in victim services work, even those whose salary is not paid by CVAD, or staff whose time is used for match purposes (paid staff and volunteers). Proof of training for all staff and volunteers must be maintained on site and shall be made available at the request of CVAD. Any program or person who is required to be a certified advocate but is unable to attain the proper training for any reason must advise CVAD immediately.

It is recommended, but not required, all agency staff who have contact with victims obtain and maintain the applicable advocate certification.

**DV/Shelter Comprehensive Programs:** Domestic Violence and Shelter Advocates are required to complete 20 hours of victim counselor training before providing any direct service to survivors. Certification must be renewed every two years. Certified victim advocates must complete 40 additional hours of training. For more information, contact ICADV, review their training manual or [visit their website](#).

**SA Comprehensive Programs:** Sexual Abuse Advocates are required to complete 20 hours of victim counselor training. Certified victim advocates must also complete the IowaCASA’s core and advanced trainings. Certification must be renewed every two years before providing any direct service to survivors. For more information, contact IowaCASA, review their training manual or [visit their website](#).

**SOHP Comprehensive Programs:** Survivors of Homicide Advocates are required to complete 20 hours of victim counselor training before providing any direct service to survivors. Contact CVAD for more information on how to obtain victim counselor training.



# Certification and Training Requirements

Twenty hours of training as outlined in Iowa Criminal Code [915.20A](#), is required as a minimum for any staff or volunteer providing direct client services. The victim service program must be engaged with and receive the training from one of the following entities:

## **Iowa Coalition Against Domestic Violence:**

As direct experience working with survivors of domestic abuse and sexual abuse is a required part of the process, only paid and volunteer staff of member programs of the Iowa Coalition Against Domestic Violence are eligible for certification through this program. As domestic and sexual abuse work is difficult, stressful, and filled with complex issues and decisions, allied professionals are welcome to attend trainings for their own professional development but are not eligible for certification.

[Information on ICADV's Advocate Certification](#)

[Advocate Certification Manual](#)

## **Iowa Coalition Against Sexual Assault (IowaCASA):**

As direct experience working with survivors of sexual abuse is a required part of the process, only paid and volunteer staff of IowaCASA's member programs are eligible for certification through this program.

Allied professionals are welcome to attend trainings for their own professional development but are not eligible for certification.

[Information on IowaCASA's Advocate Certification](#)

[Advocate Certification Manual](#)

## **Iowa Organization for Victim Assistance:**

This voluntary program is open to anyone providing direct and/or indirect services to crime victims.

[Information on IOVA's Advocate Certification Training](#)

\*\*CVAD has the discretion to modify any and all training requirements. Training requirements will be outlined in each grantee's subaward.



# Chapter 7 Confidentiality & Informed Consent

In order to ensure the safety and anonymity of victims and their families, subrecipients shall protect the confidentiality and privacy of persons receiving services.

# Confidentiality and Safety

Each agency that receives a grant from the Attorney General's office to provide direct services to victims of crime must have a confidentiality policy in place to protect confidential, personally identifying information. At minimum, this policy should include a description of informed consent, a description of any circumstances in which a program would release confidential information, as well as steps to be taken by the agency in the event of a breach, or release of personally identifying information (whether intentional or accidental). Furthermore, a confidentiality assurance should be signed by all staff, volunteers, interns, board members and anyone else who could potentially have contact with survivors. At a minimum, the policy should state the individual will protect the personally identifying information of all persons contacting the agency for service, regardless of whether these persons actually receive services from the agency.

**Under no circumstances should any victim of crime be required to provide consent to release personally identifying information as a condition of eligibility for the services provided by the grantee or subrecipient.**

Informed consent means giving a survivor information about who will be receiving the information, the expected purpose of the release and any potential dangers or negative outcomes of releasing information, if known.

Personally identifying information or personal information means individually identifying information for or about an individual including anything likely to disclose the location of a victim, including but not limited to:

- First and last name;
- Home or other physical address;
- Contact information (including, but not limited to, email address, telephone/fax number, web address or postal address);
- Social security number
- Driver's license number
- Passport number
- Student identification number; and
- Any other information including date of birth, racial or ethnic background, or religious affiliation that would serve to identify an individual.

**Agencies should ensure all client information containing personally identifying information is kept out of view from other clients, visitors, volunteers and others who are not authorized to view the information. Furthermore, client records not in use should be stored in a secure area, locked cabinet, drawer or similar storage item. If client files are stored electronically, agencies must ensure appropriate security measures are taken to protect client data such as firewalls, authorized user accounts, password protection, etc.**

# Nondisclosure

**In addition to federal statutes (FVPSA 42 U.S.C. 10402(a)(2)(e); VOCA 42 U.S.C. 10601-10604; VAWA 42 U.S.C. 13925(b)(2)), Iowa Code Section 915.20A (Victim Counselor privilege) prohibits a subrecipient from disclosing, revealing, or releasing confidential client information** without the informed, written, reasonably time-limited consent of the person (or in the case of an unemancipated minor, the minor and the parent or guardian or in the case of legal incapacity, a court-appointed guardian) about whom information is sought, whether for this program or any other Federal, State, tribal, or territorial grant program, except that consent for release may not be given by the abuser of the minor, an incapacitated person, or the abuser of the other parent of the minor. If a minor who is of sufficient age and maturity to understand the ramification of waiving privilege, or is a person with a legally appointed guardian, permitted by law to receive services without the parent or guardian's consent, the minor or person with a guardian may give informed consent to release information.

# Mandatory and Permissive Reports

A Victim Counselor (915.20A) is **not** identified as a mandatory reporter under Iowa law (232.69). A Victim Counselor, however, may be a permissive reporter. A permissive reporter is defined in Iowa law (232.69(2)) as, “any other person who believes that a child has been abused.” A permissive reporter may make a report of child abuse to the Department of Human Services, County Attorney, or law enforcement agency. Decisions to report should be made in accordance with agency policy, with adherence to the “Release” provisions noted below.

# Release of Information

If release of information is compelled by statutory or court mandate and/or if a subrecipient is compelled to release confidential client information in accordance with agency policy (i.e. if a victim is threatening to harm themselves or others):

1. subrecipients shall make reasonable attempts to provide notice to victims affected by the disclosure of information; and
2. subrecipients shall take steps necessary to protect the privacy and safety of the persons affected by the release of the information; and
3. subrecipients shall document the release, notification, (or attempts to notify) and justification for the release in the client's file/electronic record.

# Breach of Confidentiality

In the event of an unintentional breach of confidentiality, or an intentional breach of confidentiality in violation of agency policy and/or CVAD policy, the subrecipient shall provide immediate notification to CVAD electronically, or via phone.

# Information Sharing

Subrecipients may share non-personally identifying data in the aggregate, regarding services to their clients, and non-personally identifying demographic information in order to comply with Federal, State, Tribal, or territorial reporting, evaluation, or data collection requirements.

No personally identifying information is to be provided for Federal, Tribal, or State reporting, evaluation, or data collection requirements, whether for this program or any other Federal, Tribal, or State grant program.



# Chapter 8 Service Standards

All subrecipients must meet the service standards established by CVAD and the relevant Iowa victim services coalition. Service standards ensure culturally-informed, victim-centered, quality service provision to victims of crime.

# Iowa Coalition Against Domestic Violence Standards

All domestic violence comprehensive subrecipients and domestic violence shelter comprehensive subrecipients must follow the standards established by the [Iowa Coalition Against Domestic Violence](#).

# Iowa Coalition Against Sexual Assault Standards

All sexual assault comprehensive subrecipients must follow the standards established by the [Iowa Coalition Against Sexual Assault](#).

# Iowa Victim Advocate Code of Ethics

All certified victim advocates must abide by the [Advocate Code of Ethics](#) written by the Iowa Coalition Against Domestic Violence and the Iowa Coalition Against Sexual Assault.

# General Crimes Service Standards

## Program Administration and Direct Service Standards for General Crime Programs

Crime victims have a multitude of needs that cannot expect to be met by just one agency or provider. The standards that follow identify the rights and services crime victims deserve and as legislatively afforded to them according to Iowa Code 915. All VOCA funded projects have an obligation to know about these rights and services and then work with partnering Crime Victim Centers in their local communities and counties to provide a coordinated and collaborative continuum of care.

Standards for services for crime victims in Iowa:

- Respects people's rights and dignity, especially and specifically during challenging and life altering situation under which VOCA funded service providers engage them in the aftermath of criminal activity and victimization;
- Sets the level of competence expected to assure that all crime victims in Iowa will receive the same or similar level of care for the time they are engaged with any and all VOCA funded agencies;
- Creates a level of integrity that all victim service professionals can offer to the communities in which they live as well as the community of Victim Counselors;
- Victim Counselors are professionals supporting, advocating and caring for individuals, families and groups who are crime victims;
- Victim Counselors show concern and care for their neighbors and communities under the guidelines of professional ethics, standards of care and on-going professional development;
- Victim Counselors have a social responsibility to care for their communities prior to the occurrence of crime victimization and in the aftermath of crime victimization. Our professional responsibility is to work professional peers to prevent crime and promote healthy communities, as well as ensuring quality services when needed after crime victimization occurs.

**The purpose of the CVAD Standards for Program Administration and Direct Service delivery guides VOCA funded providers to:**

- Assure that all VOCA funded agencies providing services to victims of all crime adhere to the Code of Ethics.
- Ensure a standard level of service provided to all crime victims in Iowa regardless of type of victimization or location (around the state of Iowa).
- Recognize the value of specialized, skilled providers serving all crime victims.
- Instill confidence in clients and the community that paid and unpaid staff of VOCA funded agencies have successfully completed the specialized training, experience and on-going professional development necessary to provide victim/survivor-centered, trauma-informed intervention with those impacted by crime across Iowa.

**It includes: Iowa Code of Ethics, Program Administration Standards, Direct Service Standards.**

## **Code of Ethics: Victim Counselors/Certified Victim Advocates**

I. Victim Counselors have an ethical responsibility to adults and children who seek their assistance.

A. Victim Counselors will be competent.

1. Victim Counselors will have knowledge of the field of violent crime experiences and the skills to apply the knowledge.
2. Victim Counselors will constantly update their knowledge and skills.
3. Victim Counselors will not operate outside the limits of their competence, but make referrals or consultations in those areas. Advocates will seek advice and counsel from colleagues and supervisors whenever such consultation is in the best interest of clients.
4. Victim Counselors will understand how many cultural and social norms lead to and condone violence and how those norms impact the individual.

B. Victim Counselors will apprise clients of the following:

1. The array of services offered by the program;
2. The qualifications of Victim Counselors;
3. The expectations of the survivor services agency;
4. The grievance procedure;
5. The obligation to report child abuse to the Department of Human Services;
6. The limits of confidentiality.

C. Victim Counselors will protect the client's confidentiality within clearly defined limits. These limits will be explained to all clients as follows:

1. Informed, specific consent may be given to the Victim Counselors by the client to obtain services for the client from other service providers.
2. The client will be informed that confidentiality cannot be maintained in the following situations:
  - a) When a dependent adult or child has been abused, exploited or neglected.
  - b) When the client's life may be endangered and she/he cannot give consent.
  - c) When the client makes a probable threat or is violent against another person.
3. The client will be informed that confidentiality may not be maintained when a court issues a court order for specific information.
4. The Victim Counselor will consider the potential for harm to a client when releasing information even with informed consent, and consult with a Certified Advocate.
5. A client will be given the option to remain anonymous within certain limitations, such as a crisis call or

support group member.

6. The client has the right to refuse all or part of services to protect their anonymity.

D. Victim Counselors will delineate between work and social relationships and will be aware of the inherent privilege and power differences. The Advocate will never exploit relationships with clients for personal advantage.

1. Prior and/or present social or business relationships with clients require special consideration. The Advocate will, whenever possible, refer these clients to another service provider within the project or the nearest sister project.

2. Because victimization may be a long term issue, creating personal friendships between an Advocate and a client after receiving services is always inappropriate.

3. Provision of services to persons related by consanguinity or affinity, within the third degree is prohibited.

4. Sexual/romantic relationships with current or former clients is prohibited and is also a crime under Iowa Code Chapter 709.15.

5. Victim Counselors will work to increase victim safety; will respect the authority and autonomy of the adult victim to direct her own life; and will hold the perpetrator, not the victim, responsible for the violent behavior and for stopping the violence.

6. Victim Counselors will treat the client with respect and honesty in both verbal and nonverbal communication.

7. Victim Counselors will share knowledge they have with clients as it pertains to the client's situation. This may include but is not limited to the dynamics of domestic violence, sexual abuse, lethality issues, safety planning, effects on children, and the social and political issues that contribute to the continuance of sexual abuse and/or domestic violence and/or other violent crime.

8. Victim Counselors will accept what a client tells them about the violence.

9. Victim Counselors should withdraw services precipitously only under unusual circumstances, giving careful consideration to all factors in the situation and taking care to minimize possible adverse effects.

10. Victim Counselors who anticipate termination or interruption of service to clients should notify those individuals promptly and seek the transfer, referral, or termination of service in relation to the client's needs and preferences.

E. Victim Counselors will fairly distribute time, goods, and services among all clients. Advocates will not practice, condone, facilitate, or collaborate with any form of discrimination on the basis of sex, race, color, age, sexual orientation, religion, national origin, political beliefs, marital status, mental or physical disability, economic, or any other discriminatory basis.

1. Victim Counselors will have knowledge of and respect for cultural backgrounds.

2. Victim Counselors will be knowledgeable and accommodating of disabling conditions.

3. Should one client's needs conflict with another client's needs, Victim Counselors will act with regard to one client only after promptly referring the other to another qualified service provider.

F. Victim Counselors will assess clients to determine the nature of the violence, the extent of the violence, and the safety needs of the client. Victim Counselors will do nothing to increase the danger to or harm the



client.

II. The Victim Counselor has an Ethical Responsibility to keep records.

A. Victim Counselors will keep records documenting services provided as mandated by funders in accordance with state and federal guidelines.

B. Victim Counselors will record statistical and factual information, not opinions, speculations, or conclusions.

C. Victim Counselors will allow clients access to their own records.

III. Victim Counselors have an ethical responsibility to themselves.

A. Victim Counselors with education, training, and experience have the right to be called professionals and to be treated professionally.

B. Victim Counselors have an obligation to join with other professionals to promote and support recognition and fair treatment of the profession.

C. Victim Counselors will see to their own empowerment and nurturing.

D. Victim Counselors will recognize when personal circumstances may compromise professional abilities, performance, or judgment, and will take steps to resolve those issues.

E. Victim Counselors will avoid relationships or commitments that conflict with the interests of victims/survivors.

IV. Victim Counselors have an ethical responsibility to employers and colleagues.

A. Victim Counselors will adhere to the policies and procedures of their employers.

B. Victim Counselors will treat colleagues with respect, fairness, and courtesy.

C. Victim Counselors should not assume professional responsibility for the clients of another agency or a colleague without appropriate communication with that agency or colleague within the bounds required by confidentiality.

D. Victim Counselors must clearly distinguish in public statements their personal views from positions adopted by organizations for which they work or are members.

E. Victim Counselors will report to competent authority any conflict of interest that prevents themselves or a colleague from being able to provide ethical services, work cooperatively with colleagues or allied professionals, or be impartial in the treatment of any client.

F. Victim Counselors will report violations of the Code of Ethics by fellow Victim Counselors to the Certification Committee in a timely manner.

**Crime victims have a multitude of needs that cannot expect to be met by just one agency or provider. The standards that follow identify the rights and services crime victims deserve and as legislatively afforded to them according to Iowa Code 915. All VOCA funded projects have an obligation to know about these rights and services and then work with partnering Crime Victim Centers in their local communities and counties to provide a coordinated and collaborative continuum of care.**

## [Accompaniment](#)

### **Core Standard:**

Accompaniment is in-person support provided to a crime victim during crime related activities and procedural events.

### **Program Requirements:**

VOCA funded projects shall have policies for prioritizing accompaniment requests as they may not be able to fulfill all accompaniment requests. Agencies should consider collaborating with other Crime Victim Centers to fulfill such requests.

VOCA funded projects shall train staff to provide crisis intervention, crisis counseling, advocacy and resource referral that are likely part of accompaniment services.

Victim Counselors have an obligation to know about procedural events and explaining the purpose and process to crime victims who they accompany.

Victim Counselors and VOCA funded projects have an obligation to provide information to crime victims in the language they prefer. Language access partnerships and document translations services should be established proactively to be prepared to meet those needs as they arise.

### **Best Practices:**

Crime victims should be provided with written and oral information about criminal proceedings in advance of the event/procedure and provided an opportunity to ask questions.

Victim Counselors should explain the role of the crime victim during proceedings.

It is important to learn about a victim's culture and how that may impact their availability for criminal justice proceedings. Their culture may also dictate who is present during court proceedings. It is important for Victim Counselors to learn about the victims they serve holistically.

## [Assessment](#)

### **Core Standard:**

Assessment happens when the crime victim gains access to the agency for services. Assessment includes acquiring information about the crime victim seeking services and offering information about the crime related services the Agency can provide.

### **Program Requirements:**

VOCA funded projects shall have written intake procedures to acquire necessary information to understand the need and request for service.

VOCA funded projects shall acquire demographic information required for reporting purposes.

VOCA funded projects shall provide information about available crime victim services both orally and in writing. Information shall be provided in a language requested by the crime victim.

### **Best Practices:**

VOCA funded projects should provide information about confidentiality as soon as possible.

It is important to learn about a victim's culture and how that may impact their availability for criminal justice proceedings. Their culture may also dictate who is present during court proceedings. It is important for Victim Counselors to learn about the victims they serve holistically.

Victim Counselors will make referrals to other community providers who may better fulfill the needs and services requested by the crime victim that go beyond the scope of services of the VOCA funded agency.

## [Case Management](#)

**Core Standard:**

Case management services happen when the crime victim accesses the agency for on-going services. Case management includes ongoing assessment of need for support and service and successful completion toward self-determined goals.

**Program Requirements:**

VOCA funded projects shall have written case management procedures and guidelines for staff to document ongoing services and relationships with crime victims they serve.

VOCA funded projects shall provide information about the scope of case management services to crime victims both orally and in writing. Information shall be provided in a language requested by the crime victim.

**Best Practices:**

VOCA funded projects should maintain relationship with a variety of human service providers in the community who can help meet the needs of the crime victims with whom they will provide case management services. Agencies should have MOUs established with such agencies and community partners in advance of service referrals being made.

Partnerships should be developed with agencies and community groups who support people from all cultural backgrounds.

[Case Status](#)**Core Standard:**

Crime victims have the right to have updated information about the status of the criminal case in which they are involved as per Iowa Code 915.

**Program Requirements:**

VOCA funded projects shall provide training to Victim Counselors about the criminal justice and juvenile justice processes from the time charges are filed through the disposition of charges.

VOCA funded projects shall provide training to Victim Counselors about the role of victims in the criminal justice system and their right to know about each court event throughout the prosecutorial process.

**Best Practices:**

VOCA funded projects shall maintain relationships with Victim Counselors who provide these services in an effort to make referrals to streamline services for crime victims.

VOCA funded projects should advocate that partnering agencies provide culturally competent services to all crime victims.

[Civil Legal Services](#)**Core Standard:**

Crime victims may have legal needs resulting from the criminal activity that are outside of the criminal and juvenile justice systems. Civil remedies can contribute to the restoration of the crime victim in meaningful ways during and after their engagement in the criminal and juvenile justice systems.

**Program Requirements:**

VOCA funded projects shall provide training to their staff about the scope and breadth of civil legal needs crime victims may have as a result of their crime victimization.

**Best Practices:**

VOCA funded projects should network with local civil legal providers in their communities who can support the crime victims they serve. Agencies should provide training to these civil legal providers about the criminal and juvenile justice processes in their counties and how these systems may intersect with the civil legal needs crime victims may experience. A referral process or MOU should be established for making referrals to local civil practices who are willing to support crime victims.

Partnering agencies should be culturally competent and fully accessible for all crime victims.

#### Collaboration with Community Partners

##### **Core Standard:**

VOCA funded projects shall develop and maintain relationships with community agencies who can support crime victims beyond the scope of services they provide and avoids duplicating services provided by the agency.

##### **Program Requirements:**

VOCA funded projects shall have information about community agencies that can support crime victims beyond the scope of their services.

VOCA funded projects shall establish a referral process with community agencies who can also support crime victims.

VOCA funded projects shall provide information about available services with community agencies both orally and in writing. Information shall be provided in a language requested by the crime victim.

##### **Best Practices:**

VOCA funded projects should cross train with community partners to ensure other agencies are providing trauma informed and client centered services. Agencies should also ensure that their community partners understand the criminal justice process and the range of needs with which crime victims may present.

Partnerships should be developed with agencies and community groups who support people from all cultural backgrounds.

#### Confidential Communications

##### **Core Standard:**

The confidentiality of the communication between the Victim Counselor and the crime victim is essential in protecting the safety of crime victims and ensuring their privacy. Confidentiality is an ethical principle and legal right that Victim Counselors and VOCA funded projects will hold secret all personal information relating to a crime victim until or unless they provide written consent to disclose the information. Confidential communications and the extent to which crime victims have privilege with identified providers are outlined in Iowa Code 915.

##### **Program Requirements:**

VOCA funded projects shall provide information orally and in writing to crime victims about the level of confidentiality they can expect with that agency and with the staff, volunteers and interns with whom they will interact. Information shall be provided in a language requested by the crime victim.

VOCA funded projects shall provide on-going training to Victim Counselors, both paid and unpaid, about the agency's confidentiality policy and release of confidentiality procedures.

VOCA funded projects will have written procedures for crime victims to provide permission to Program Staff to release information to other service providers as part of the continuum of service and care provided by the Program.

VOCA funded projects will have written procedures for keeping crime victim client files and information confidential.

##### **Best Practices:**

VOCA funded projects should provide information about confidentiality upon first contact with the crime victim. Victim service staff should offer explanations about levels of confidentiality and what to expect from them and their agency, especially if the crime victim is working with other crime victim agencies.

### [Counseling/Supportive Counseling](#)

#### **Core Standard:**

Supportive counseling is the provision of information, empathetic listening, feedback, clarification of options and assessment to a crime victim in response to the effects of the victimization. Supportive counseling assists the crime victim in managing the emotionally significant events that result from being a crime victim and assists them while using a victim-centered, trauma-informed process.

#### **Program Requirements:**

VOCA funded projects shall provide supportive counseling in a safe and secure environment where the highest level of privacy can be reasonably assured.

VOCA funded projects shall provide applicable and ongoing training for victim services staff who provide supportive and ongoing counseling.

VOCA funded projects shall continually assess the need of the crime victim and provide supportive counseling if necessary. The agency shall have relationships with other professionals in the community who provide trauma-informed counseling and group counseling services so that they can make referrals when the needs of the crime victim exceeds the services provided by the agency or when the crime victim requests additional counseling services.

#### **Best Practices:**

VOCA funded projects should advocate within professional networks for the need and development of trauma focused counseling and therapeutic services within their communities. Agencies can also advocate for therapeutic services to be provided in the languages accessible by those living in the community.

Partnerships should be developed with practitioners and community agencies/networks who support people from all cultural backgrounds.

### [Court Events & Notifications](#)

#### **Core Standard:**

Crime victims have the right to be notified of court events according to Iowa Code 915. While designated offices or agencies working in or in partnership with the County Attorney's Office may be primarily responsible for making such notifications, it is critical that all Victim Counselors understand the process of the criminal court system and how victims are notified of procedural court events.

#### **Program Requirements:**

VOCA funded projects shall provide training to Victim Counselors about the criminal justice and juvenile justice processes from the time charges are filed through the disposition of charges.

VOCA funded projects shall provide training to Victim Counselors about the role of victims in the criminal justice system and their right to know about each court event throughout the prosecutorial process.

#### **Best Practices:**

VOCA funded projects shall maintain relationships with Victim Counselors who provide these services in an effort to make referrals to streamline services for crime victims.

### [Court Orientation](#)

#### **Core Standard:**

Crime victims have the right to be attend certain court events according to Iowa Code 915. While designated offices or agencies working in or in partnership with the County Attorney's Office may be primarily responsible for providing accompaniment to these specific events, it is critical that all Victim Counselors understand the process of the criminal and juvenile court systems and how crime victims participate in procedural court events.

#### **Program Requirements:**

VOCA Funded Programs shall maintain relationships with Victim Counselors who provide court

accompaniment in an effort to make referrals to streamline services for crime victims, including orientation to these events provided in person and by phone.

**Best Practices:**

VOCA funded projects staff should attend formal court orientation meetings to better understand the criminal and juvenile justice processes. If no formal court orientation exists, Victim Counselors should attend court events as part of their training to better understand the criminal and juvenile justice systems so that they can better inform crime victims of such processes.

VOCA funded projects should collaborate to develop a county-specific model for the court orientation process that includes: written materials, courtroom orientation, and logistics of the court (i.e., transportation, safety/security issues, parking, etc.). This court orientation process shall also provide accommodations for individuals having special needs, the age of the victim, and any urban/rural issues.

[Crime Victim Grievances](#)

**Core Standard:**

Crime victims have rights according to Iowa Code 915. VOCA funded projects shall have a process in place for crime victims to file a grievance if they believe their rights have been violated according to Iowa Code 915.

**Program Requirements:**

VOCA funded projects shall provide information about their grievance policy to crime victims during the initial intake/assessment meeting. Information shall be provided in a language requested by the crime victim.

VOCA funded projects shall provide training to Victim Counselors about the Program's grievance policy and procedure.

VOCA funded projects shall have relationships with other Victim Counselors in the community to whom they can refer crime victims if they choose to discontinue services with the VOCA Funded Program as a result of a grievance.

VOCA funded projects shall maintain records of grievances, investigative procedures and outcomes.

**Best Practices:**

VOCA funded projects shall provide information to crime victims who want to file a grievance about the Iowa Attorney General Crime Victim Assistance Division (CVAD) as an option for reporting a grievance.

[Crisis Intervention](#)

**Core Standard:**

Crisis intervention provides the person in crisis with the tools to manage the crisis and to facilitate movement toward stability. VOCA funded projects shall provide a range of services, including safety planning, to a victim during any crisis that may result in the aftermath of a crime.

**Program Requirements:**

VOCA funded projects shall provide training to Victim Counselors about crisis intervention, including assessing the situation with the crime victim and making appropriate referrals to outside agencies when the crime victim's needs exceed that which can be offered by the agency.

VOCA funded projects shall provide training to Victim Counselors about safety planning, both immediate and long-term safety concerns. Safety planning should include physical and emotional safety.

**Best Practices:**

Crisis can be rooted in emotional, physical, safety and financial insecurities. VOCA funded projects should be prepared to assist and intervene with crime victims when they experience any number of crisis situations.

Crisis responses may be impacted by the individual's cultural background. VOCA funded projects should



provide training to Victim Counselors that includes cultural humility and the relationship between victimization and cultural influences.

#### Cultural Humility

##### **Core Standard:**

Cultural humility is (commonly defined as) the ability to maintain an interpersonal stance that is other-oriented in relation to aspects of cultural identity that are most important to the individual. It includes self-reflection and personal critique practiced by professionals from all backgrounds.

##### **Program Requirements:**

VOCA funded projects shall provide training to Victim Counselors about the cultural practices and beliefs of those living in the communities they serve.

VOCA funded projects shall provide information about their services to all communities and groups whom they serve in their region. Information shall be provided in a language that best serves community needs.

##### **Best Practices:**

VOCA funded projects should maintain relationships with leaders and/or gatekeepers to communities and groups within their service area.

VOCA funded projects should engage local communities and groups to provide training to their staff.

#### Information and Referral

##### **Core Standard:**

Crime Victims and their families benefit when they have information about the criminal justice process and the agencies and services available to offer assistance throughout the process. Victim Service Professionals therefore have an obligation to provide information and make referrals so that crime victims and their families can make well informed decisions as they navigate the criminal justice system and their own healing.

##### **Program Requirements:**

VOCA funded projects receive training about the criminal justice process and be able to offer information to crime victims about the process. This includes victims rights information, how victim notifications are processed and from what office, and Victims Compensation eligibility and claims processes.

VOCA funded projects shall provide information about other victim services providers, both community-based and systems-based offices, as well as other community-based services regardless of their location. (Victims who live somewhere other than where the crime occurred deserve the same consideration and Victim Counselors have an obligation to know or acquire that information to make an appropriate referral.) This information should be provided both orally and in writing. Information shall be provided in a language requested by the crime victim.

##### **Best Practices:**

VOCA funded projects should network regionally and across disciplines or specific populations served.

#### Individual Advocacy

##### **Core Standard:**

Individual advocacy is an intervention provided by Victim Counselors as a way to collaboratively serve the crime victim – obtaining information to better assess their individual needs and then providing support and information through all phases of the criminal and civil justice systems and processes. Victim Counselors walk alongside crime victims as they navigate these systems, assuring options and resources are presented to the crime victim as directed by Iowa Code 915 and as would be commonly accepted best practices within local communities. Victim Counselors can and should empower crime victims to speak and act on their own behalf.

##### **Program Requirements:**



Victim Counselors need to develop an expert level understanding of the criminal justice system and local practices to assure all services are offered and provided to the crime victim.

Victim Counselors may provide personal accompaniment to crime victims to criminal and civil justice proceedings. Victim Counselors should attend criminal and civil justice proceedings as part of their orientation to the VOCA Funded Agency so that they can explain procedures to crime victims and help them predict and prepare for such activities as they may be required or requested to attend.

It is important to learn about a victim's culture in an effort to provide holistic services.

**Best Practices:**

Victim Counselors should develop professional working relationships with law enforcement, prosecutors, court personnel and other Victim Counselors to create and assure pathways for crime victims navigating the criminal justice system.

VOCA funded projects should network with community agencies outside of the criminal justice system to be able to advocate for crime victims on a broad range of needs that may arise from the crime victimization. Partnerships should be developed with agencies and community groups who support people from all cultural backgrounds.

[Outreach](#)

**Core Standard:**

VOCA Funded Programs have an obligation to make the community at large aware of their services. Outreach, in its many forms, makes the community and potential crime victims aware of the Agency and the specialized services it provides to crime victims.

**Program Requirements:**

VOCA funded projects should provide information about its services and the need for services for crime victims generally. This information should be provided both orally and in writing. Information shall be provided in languages commonly spoken with their community. Programs should consider a variety of methods and platforms for disseminating information.

VOCA funded projects should meet with diverse groups to determine their needs, how to best meet those needs collaboratively and also how they and the Program can proactively collaborate to prevent future crime victimization.

**Best Practices:**

VOCA funded projects should provide information and brochures to law enforcement and other criminal justice professionals to provide to crime victims who may not immediately contact their agency. These professionals may also learn about needs that go beyond the criminal justice system but may be that which the VOCA funded projects can assist.

VOCA funded projects should network with community agencies outside of the criminal justice system to be able to collaborate on community education and outreach opportunities. Partnerships should be developed with agencies and community groups who support people from all cultural backgrounds.

[Release, Transfer, Escape](#)

**Core Standard:**

Crime victims have the right to notified when the perpetrator of their crime is transferred within or released or escapes from custody as per Iowa Code 915.

**Program Requirements:**

VOCA funded projects shall provide training to Victim Counselors about the automated victim notification system.

VOCA funded projects shall provide training to Victim Counselors about how crime victims can register with

the automated victim notification system.

**Best Practices:**

VOCA funded projects shall maintain relationships with Victim Counselors who can assist crime victims with notification registration in an effort to make referrals to streamline services for crime victims.

[Restitution](#)

**Core Standard:**

Restitution may be provided to crime victims to pay for specific reimbursement or replacement items as per Iowa Code 915.

**Program Requirements:**

VOCA funded projects shall maintain training for all victim service staff about the eligible reimbursement and replacements items paid for by court ordered restitution as per Iowa Code 915.

VOCA funded projects shall provide information about requesting restitution as part of the criminal justice proceedings in which they are involved. Information shall be provided in a language requested by the crime victim.

**Best Practices:**

Victims service providers should work collaboratively with the appropriate court or prosecutorial staff to ensure submitted claims are complete and expedited appropriately.

[Restorative Justice](#)

**Core Standard:**

Restorative justice opportunities are typically provided to crime victims outside of the traditional criminal justice system and often after the criminal justice system has officially disposed of the criminal charges. Restorative opportunities can often meet the needs of the crime victim/survivor beyond the scope of the criminal justice system to create victim defined justice.

**Program Requirements:**

VOCA funded projects shall maintain training for all victim service staff about restorative justice practices and opportunities available in the community.

VOCA funded projects shall provide information about restorative justice opportunities provided by community partners. Agencies shall maintain procedures for referring crime victims/survivors to restorative services provided by their community partners. Partnering agencies should be culturally competent and fully accessible for all crime victims.

**Best Practices:**

Victim Counselors can use restorative practices when working with crime victims and should be trained to do so.

[Safety Planning](#)

**Core Standard:**

Safety planning is any formal or informal, written or oral, conversation or process with the crime victim through which the Victim Counselor works with the victim to identify and address risks as a result of the crime victimization.

**Program Requirements:**

VOCA funded projects shall provide training to staff to develop safety planning skills.

Safety planning, both immediate and long-term safety concerns, should include physical and emotional safety.

Safety planning should include the individual's cultural background.

**Best Practices:**

VOCA funded projects should build relationships with other VOCA funded projects and community-based agencies, including from diverse communities, to address the needs identified as part of the safety plan.

VOCA funded projects should provide training to Victim Counselors that includes cultural humility and the relationship between victimization and cultural influences.

[Self-Care for Victim Counselors](#)**Core Standard:**

Self-care is an ethical obligation Victim Counselors have to the crime victims they serve. VOCA funded projects have an obligation to support the professional self-care needs of their staff so that they can provide exemplary services to crime victims and the community at large.

**Program Requirements:**

VOCA funded projects shall develop a written policy that includes the ethical obligation Victim Counselors have to maintain good self-care. This policy should include supervision practices that will support self-care practices for VOCA funded staff. This policy should include the Program's commitment to supporting VOCA funded in ongoing self-care practices.

**Best Practices:**

VOCA funded projects should provide formal and informal opportunities for victim service staff to engage with one another and maintain good self-care. Good self-care practices are ongoing and supported by co-workers and agency leaders.

VOCA funded projects should explore trauma-informed agency assessments and updating/implementing trauma informed policies and procedures that benefit all agency staff.

[Systems Advocacy](#)**Core Standard:**

VOCA funded projects should engage in activities that improve system-wide responses to crime victims. Opportunities for systems advocacy are found within the criminal and juvenile justice systems as well as within healthcare networks, educational systems and community based human service networks.

**Program Requirements:**

VOCA funded projects shall identify networks and systems within their communities within which crime victims may interact or engage. Agencies should build professional working relationships within such systems on behalf of crime victims.

VOCA funded projects should think broadly about the needs of the crime victims they serve and go beyond the professional networks to also build relationships within diverse communities where crime victims are and could be supported or served (formally or informally). Partnering agencies should be culturally competent and fully accessible for all crime victims.

**Best Practices:**

Victim Counselors should be visible within the communities they serve. This means that VOCA funded staff should attend community events as well as systems related meetings and networking opportunities.

Partnerships should be developed with agencies and community groups who support people from all cultural backgrounds.

[Technology Use](#)**Core Standard:**

VOCA funded projects may use technology in providing and expanding services to crime victims when there is a lack of transportation or other events (weather disasters, pandemic, other emergency lock down situations) that prevent them from meeting in person. Agencies are also likely to use electronic databases to

track, monitor and report services provided to crime victims. Agencies are encouraged to consider the logistical needs and ethical considerations that need to be addressed in these circumstances.

Technology used with crime victims may include: tele-counseling via telephone and/or web-based programs, text lines, chat rooms, etc. Technology used in collecting and managing client information and reporting aggregate client information for reporting purposes may include web-based software and the transmission of information through secure online venues.

**Program Requirements:**

VOCA funded projects shall determine the most appropriate technology to use for service delivery after exploring some of the following considerations:

- Technology that is user-friendly and accessible for both the crime victim and agency staff;
- Technology that most effectively achieves the desired outcome for clients;
- Risk-benefit analysis of the technology system or agency;
- Confidentiality protections;
- Data back-up, both maintaining data back-up when technology fails and deleting unnecessary and unprotected data.

VOCA funded projects should have policies in place to provide direction for staff to:

- Protect confidentiality with every client communication and data entry into client records;
- Protect confidentiality if staff must use personal devices when the agency is unable to issue devices to staff; and
- Maintain network security when transmitting data via wifi, especially in the absence of an encrypted connection to client records and databases.

VOCA funded projects should consider how they might conduct intakes, assessments and the full spectrum of program services using technology. Additionally, agencies should consider how paperwork will be signed electronically by crime victims.

**Best Practices:**

VOCA funded projects should secure technology that provides interpreter access.

VOCA funded projects staff should use only technology and devices provided by the Program to maintain security and confidentiality standards.

VOCA funded projects should have policies providing direction to Program Staff about social media usage on Program issued devices.

VOCA funded projects should include technology use and abuse as part of safety plans with crime victims.

[Training](#)

**Core Standard:**

Specialized training is required to ensure optimum delivery of support services to crime victims. Training provides Victim Counselors with the knowledge and skills to provide solid information to crime victims and make professional judgments when working with crime victims. Training is an ongoing process.

**Program Requirements:**

VOCA funded staff will acquire the Victim Counselor training as provided by IOVA, IowaCASA or ICADV. This foundational training is required to ensure baseline knowledge and skills necessary to provide trauma-informed care to crime victims and survivors. This orientation will be acquired by Victim Counselors interacting with crime victims and funded under VOCA.

The **Victim Counselor training** includes the following topics:

- Criminal Justice System Response to Crime Victims
- Confidentiality
- Ethical Issues / Boundaries
- Advocacy Skills (systems and community based)
- Safety Planning
- Diversity: delivering culturally relevant services consistent with community assessment
- Self-Care
- Outreach & Systems Advocacy
- Social Change: prevention & collaboration

VOCA funded Victim Counselors will have 8 hours of annual ongoing training after participating in the Victim Counselor training within the first six months of hire. Trainings organized and sponsored by the Iowa Coalition Against Domestic Violence (ICADV), Iowa Coalition Against Sexual Assault (IowaCASA), Crime Victim Assistance Division (CVAD), the Iowa Organization for Victim Assistance (IOVA), Iowa's US Attorney's Office, National Resource Sharing Project (RSP), National Sexual Violence Resource Center (NSVRC), National Network to End Domestic Violence (NNEDV), Office on Violence Against Women (OVW), OVW Technical Assistance Providers, National Center for Victims of Crime (NCVC), National Organization for Victim Assistance (NOVA), and the Office for Victims of Crime (OVC) Training and Technical Assistance Providers are pre-approved. Trainings sponsored by other organizations can be submitted for approval to CVAD. [ **Please note:** Only direct hours spent in approved trainings can be applied toward the continued education requirement. Lunch, breaks and travel time do not count towards continued education hours.]

VOCA funded projects shall have written training policies to assure proper documentation of annual training hours for all VOCA funded staff.

**Best Practices:**

VOCA funded agencies should work with diverse communities in their local areas to collaboratively train professionals and community members to better serve crime victims. Diversity training, cultural competency and cultural humility trainings should be part of the annual training hours for a VOCA Funded Programs.

[Victim Impact Statements](#)**Core Standard:**

Crime victims have rights as per Iowa Code 915. It is critical that all crime victims know about these rights regardless of their level of engagement in the criminal justice system. All Victim Counselors have an obligation to know about victims' rights and provide that information to the crime victims whom they serve.

**Program Requirements:**

VOCA Funded Programs shall maintain training for all victim service staff about the Victims' Rights.

VOCA Funded Programs shall provide information about Victims' Rights both orally and in writing. Information shall be provided in a language requested by the crime victim.

**Best Practices:**

Victims Service Providers should work collaboratively with the CVAD when there are questions or concerns about the possible violation of victims' rights.

[Victim/Witness Intimidation](#)

**Core Standard:**

Crime victims have the right to petition the Court for protection when they are intimidated or harassed by the perpetrator of their crime or an associate as per Iowa Code 915.

**Program Requirements:**

VOCA Funded Programs shall provide training to Victim Counselors about victim intimidation as outlined in Iowa Code 915.

VOCA Funded Programs shall provide training to Victim Counselors about the process of applying for protection from intimidation or harassment as per Iowa Code 915.

**Best Practices:**

VOCA Funded Programs shall maintain relationships with Victim Counselors who provide support services to crime victims who file claims of intimidation or harassment in an effort to make referrals to streamline services for crime victims.

Partnering agencies should be culturally competent and fully accessible for all crime victims.

[Victims Compensation Assistance](#)

**Core Standard:**

Victims Compensation Assistance is provided to crime victims to pay for specific services as per Iowa Code 915.

**Program Requirements:**

VOCA Funded Programs shall maintain training for all victim service staff about the Victims Compensation Assistance Program and eligible services and replacements items.

VOCA Funded Programs shall provide information about available Compensation services and replacement items both orally and in writing. Information shall be provided in a language requested by the crime victim.

VOCA Funded Programs shall provide information about making a Compensation Claim.

**Best Practices:**

Victim Counselors should provide assistance to crime victims who want to file a Compensation Claim. This can include helping them complete the paperwork and acquiring or collecting supporting documentation for the Claim.

Victims Service Providers should work collaboratively with the CVAD Compensation staff to ensure submitted claims are complete and expedited appropriately.

[Victims' Rights Notification](#)

**Core Standard:**

Crime victims have rights as per Iowa Code 915. It is critical that all crime victims know about these rights regardless of their level of engagement in the criminal justice system. All Victim Counselors have an obligation to know about victims' rights and provide that information to the crime victims whom they serve.

**Program Requirements:**

VOCA Funded Programs shall maintain training for all victim service staff about the Victims' Rights.

VOCA Funded Programs shall provide information about Victims' Rights both orally and in writing. Information shall be provided in a language requested by the crime victim.

**Best Practices:**

Victims Service Providers should work collaboratively with the CVAD when there are questions or concerns about the possible violation of victims' rights.



# Statewide Telephone/Crisis Text Hotline Requirements

All statewide hotlines and crisis text services that provide comprehensive crisis counseling, support and referral services to survivors of domestic violence, sexual assault and other crimes in Iowa must abide by the following standards:

- Be provided in a static location, not from mobile phones or an alternative location, such as a staff person's or volunteer's home.
- Be able to move from chat conversation to telephone conversation as requested by caller.
- Be available 24 hours a day, 7 days a week with the capacity to handle roll over calls from victim service programs choosing to forward their local hotlines after hours and on weekends.
- All hotline and crisis text/chat staff must receive a criminal history background check. Criminal history guidelines that would exclude a candidate from successful employment will be per the agency's written policies and procedures.
- Have written policies and procedures that guide the following services:
  - Crisis response to assess the caller for safety and provide any crisis counseling to address the immediate crisis. The nature of the crisis and goals of the call are determined by the caller and can include the after effects or long-term consequences of previous intimate partner abuse.
  - Information and referral to the victim service and/or other program(s) in their area to receive services. The advocates providing hotline services will have access to resources statewide to provide the most comprehensive referrals.
  - Confidentiality to ensure confidential communications exist between the victim counselor and the client. The policy should include procedures and provisions for the release of information, response to subpoenas, and exceptions required by law and must be in compliance with the guidelines as demonstrated in the Iowa Code. To safeguard confidentiality and anonymity, crisis lines may not use caller I.D. capabilities. Blocked calls and collect calls (including those from correctional institutions) must be accepted.
  - Connecting victims to local service provider through a direct call connection, rather than merely providing the number, whenever possible.
  - [Additional written policies and procedures as outlined in CVAD's Chapter II. Section Required Policies and Procedures.](#)
- Accessibility that addresses compliance with all federal and state statutes prohibiting discrimination including the Americans with Disabilities Act – (42 U.S.C.S. § 12101, et seq.) and the Rehabilitation Act – (29U.S.C.S. § 794)
- Accommodate individuals with hearing disabilities through a video phone, and/or a relay service.
- Provide meaningful no-cost access to certified translation or interpretation to individuals with Limited English Proficiency (Title VI of the Civil Rights Act of 1964 and Presidential Executive Order 13160). Have a written language access policy that outlines procedures for ensuring victims have access to necessary forms of communication, both written and verbal.
- Be able to dispose of client-related data and information and the technologies used in a manner that facilitates protection from unauthorized access and accounts for safe and appropriate disposal.
- Crisis/Chat line [staff must abide by Advocate Certification and Training Requirements in Chapter VI.](#)

**Phone call data:** The data collected should be securely stored in house. The information is owned by the program, not by an outside entity.

**Database:** The program used should meet Crime Victim Assistance Division (CVAD) standards and meet the reporting requirements of the grantor, without disclosing personal identifying information.

**Phone System and Tertiary Technology:** Must have a phone system and computer equipment to successfully handle a statewide crisis line. This includes:

- Individual phone system with the ability to direct connect to peer programs
- Phone Hardware: including phones, phone system hardware and computer server to run phone software (Voice server, IP system, switches)
- Accessory items: rack mounts, cables



- Phone software including licenses, upgrades
- Server software including operating system, virus protection, and networking tools.
- Primary Rate Interface (PRI) phone system with multiple incoming and outgoing lines. PRI allows for 23 incoming and outgoing calls at one time.
- Voice over Internet (VoIP) phone system with analog line back up in case of power outages.
- Internet bandwidth to support multiple phone calls and internet activity. This will be determined by the program's technology/internet provider.
- Visual screen interface with call queue.
- Computers: each advocate should have access to a computer while on duty, to monitor the call queue and perform administrative duties.
- Computer software: Each computer should have basic software to perform daily tasks (MS Office, database), including virus software for security purposes.

# Chapter 9 Reporting Requirements

The Attorney General's Office through the Victim Assistance Section and the Victim Services Support Program (VSS) administers funding from the following: State of Iowa funding, Federal Family Violence Prevention and Services Act (FVPSA), Federal Victim of Crime Act (VOCA), Federal STOP Violence Against Women Act (STOP), and Federal Sexual Abuse Services Program (SASP).

The completion and submission of performance and financial reports is an important requirement for grant recipients.

Reports are used to monitor projects, fulfill federal grant reporting requirements, provide information for state strategies and implementation plans and assist Victim Services (VSS) to determine project success and funding allocations. The project directors are usually the persons responsible for timely submission of completed program and fiscal reports. Failure to submit required reports on time is a breach of contract requirements. Financial reimbursement may be withheld pending the submission of late report(s).

Grantee reports will be completed and submitted in various ways depending upon the types of funding you receive. Instructions on how to complete each report can be found [here](#).

If the due date of any report falls on a Saturday, Sunday or holiday, the report is due the next business day.

# Victims of Crime Act Assistance Grant (VOCA) Reports

Subrecipients of [Victims of Crime Act \(VA\) funds](#) are responsible for completing two different reports: the annual SAR (Subgrant Annual Report) and the quarterly Subgrantee Data Report, which we refer to as the quarterly PMT report. Whoever is responsible for submitting VOCA reports must be registered in the Office of Justice Program Performance Measurement Platform ([OVC PMT](#)).

Click [here](#) for VOCA definitions.

1. [Subgrant Annual Report \(SAR\)](#): The SAR is required to be completed annually within 60 days of receipt of a contract with CVAD. CVAD is required to complete the first section of the SRS (Questions #1-7). The subrecipient is required to review responses to Questions #1-7 for accuracy and if changes are necessary, contact their grant manager. Subrecipients are required to complete the second section of the SAR (Questions #8-11). [Here are detailed instructions](#) to complete your SRS. [Here is a worksheet](#) to help you determine how to complete SRS if you have more than one CVAD grant.

2. [VOCA Subgrantee Data Report](#): Subrecipients are required to complete a performance report on a quarterly basis in the federal PMT system. The table below shows the reporting periods and due dates. At a minimum, a subrecipient should review the quarterly report at the beginning of the contract period to be sure all required data is tracked. This [Excel spreadsheet](#) will assist you in tracking the required data for your quarterly VOCA Subgrantee Data Report if you do not have a database or other means to track this information.

For more information on the PMT system and VOCA quarterly reports see the following links:

[Performance Measurement Tool Subgrantee User Guide](#)

[Subgrantee Data Report Frequently Asked Questions](#)

[Performance Measurement Tool PMT Frequently Asked Questions](#)

## Victims of Crime Act (VOCA) Quarterly Performance Report

<u>Reporting Period:</u>	<u>Due Date:</u>
October 1 <sup>st</sup> – December 31 <sup>st</sup>	January 31 <sup>st</sup>
January 1 <sup>st</sup> – March 31 <sup>st</sup>	April 30 <sup>th</sup>
April 1 <sup>st</sup> – June 30 <sup>th</sup>	July 31 <sup>st</sup>
July 1 <sup>st</sup> – September 30 <sup>th</sup>	October 31 <sup>st</sup>

# STOP Violence Against Women Formula Grant Funds (VAWA)

If a subrecipient receives [STOP Violence Against Women Funds \(VAWA\)](#) funds, an annual STOP VAWA report is due February 15. The reporting period is the previous calendar year (January to December). The STOP VAWA annual report is completed and submitted in the required Adobe file format and uploaded in the Performance Reports component of [Iowa GVS](#).

The [STOP VAWA reporting template and reporting instructions](#) can be found on the Attorney General's website.

For more information on completing the STOP VAWA reports, go to the [Measuring Effectiveness Initiative](#) website.

*Note to law enforcement, prosecution and statewide agencies receiving Violence Against Women funds: Your STOP report should be completed as it applies to work related to violence against women (i.e., the number of trainings provided on violence against women issues) unless otherwise specified in the report.*

# Sexual Abuse Services Program (SASP)

If a subrecipient receives [Sexual Abuse Service Program \(SASP\)](#) funds, an annual SASP report is due February 15, which reports the previous calendar year's (January to December) grant activities. The SASP annual report is completed and submitted in the required Adobe file format and uploaded in the Performance Reports component of [Iowa GVS](#).

The [SASP reporting template and reporting instructions](#) can be found on the Attorney General's website.

# Family Violence Prevention & Services Act (FVPSA)

If a subrecipient receives [Family Violence Prevention & Services Act \(FVPSA\)](#) funds, an annual FVPSA Report is due November 15, which reports the grant activities from the most recent October 1, to September 30 grant year. The FVPSA Annual Report is required to be submitted in the Performance Reports component of [Iowa GVS](#).

The [FVPSA reporting template and reporting instructions](#) can be found on the Attorney General's website.

# Bi-Annual Performance Reports (Required of All Subrecipients)

All subrecipients receiving victim assistance funds, must complete Victim Assistance bi-annual performance reports.

These programs: Domestic Abuse Comprehensive (DAC), Sexual Abuse Comprehensive (SAC), Shelter-Based Victim Services, Statewide Victim Coalition, Culturally Specific Programs (CSP), Statewide Victim Hotline or Survivor of Homicide Program are required to use the Empower Database System (Empower DB). The reporting section of Empower DB has the capability of printing the reports.

Subrecipients who are required to use Empower DB will run their bi-annual performance report in the Empower DB system and then submit them in the Performance Reports component of [Iowa GVS](#).

Empower DB has an assortment of instructional videos illustrating data entry and how to navigate the system in the Database Documentation Section.

[EmpowerDB activity definitions](#) will be used by anyone completing required reports. This comprehensive listing of activities and their corresponding definitions is designed to assist those agencies using EmpowerDB; however, anyone can use these helpful definitions.

The [Biannual reporting templates](#) can be found on the Attorney General's website.

## OTHER REPORTS

Any other reports such as Law Enforcement, Violence Against Women Prosecutors, Victim Witness Coordinators and VOCA Projects can be found [here](#).

# Chapter 10 Purchasing Procedures

Purchasing procedures establish the authority and mechanics required in purchasing for the subrecipient's operation. The purpose is to establish guidelines and regulations governing the purchase of supplies, equipment, contractual services, and other items, to ensure funds are expended in accordance with an approved budget, with consideration of the availability of funds to pay for such purchases, and in compliance with contractual provisions and relevant laws and regulations.



# Purchases

Subrecipients shall follow their own purchasing procedures provided the procurement conforms to applicable federal law and the standards identified in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ([2 CFR 200](#)).

At minimum, CVAD grant recipients and subrecipients must follow the procurement standards as written in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards - [200 CFR 318](#) through [200 CFR 326](#).

Subrecipients must have standards and procedures in place for a segregation of duties to ensure no one individual has the authority/responsibility to order, receive purchases, approve invoices for payments, or make payments, sign checks and mail payments.

# Selecting Vendors

**Vendor Qualifications:** All vendors providing supplies, equipment, or services should be reputable firms having demonstrated capacity to produce or provide supplies, equipment, services and other items within a reasonable time or within specific time limits established by the purchaser. Vendors should be subject to disqualification if they misrepresent quality, quantity, or price of what is being purchased. Vendors that exceed reasonable time limits should also be disqualified.

**Selecting Vendors:** Whenever possible, select vendors on the basis of three price quotations or competitive bids. As a subrecipient, you must conduct all procurement transactions in a manner providing full and open competition consistent with the Procurement Standards in the Uniform Requirements at [CFR 200.319](#). This requirement holds whether procurement transactions are negotiated or competitively bid, and without regard to dollar value. In order to avoid unfair competitive advantage, contractors that develop or draft specifications, requirements, statement of work and invitations for bids or requests for proposals, must be excluded from competing for such procurement.

Written procedures for procurement transactions must ensure all solicitations incorporate a clear and accurate description of the technical requirements of the material, product, or service to be procured. Solicitations should also identify all requirements that must be fulfilled and all other factors to be used in evaluating bids and proposals.

Under certain circumstances, supplies, equipment, services, or other items may be purchased without bids or quotations. Quotations may not be necessary if a qualified vendor is the sole source of the items to be purchased, or, in case of emergency, when immediate delivery is necessary for the entity's continued provision of adequate services.

All sole-source purchases should be reviewed by the person at the agency with authority to approve such purchases, or a designee. In any event, the grantee project director should be apprised of any sole-source purchase as soon as possible. A written memorandum explaining all emergency purchases and all other sole-source purchases exceeding an amount determined by management should be attached to the file copy of the purchase order.

To determine what Method of Procurement to be followed, please refer to [CFR 200.320](#) (Methods of Procurement) in the Uniform Requirements as well as [Chapter XIV. Procurement of Goods and Service and Chapter XV. Procurement of Professional Services](#) of this grant manual.

# Disbursement of Funds

Upon proper certification of invoices and bills, make disbursements in accordance with your agency's policies and standard grant procedures for the issuance of checks and vouchers.

# Supporting Documentation

Present supporting documentation to justify each journal entry. In most cases, staff members should use preprinted, sequentially numbered forms. Written policies, concerning the use of the forms, should be established.

The following are examples of supporting documentation:

1. All journals and ledgers
2. Annual financial reports with working papers
3. Annual program reports, including statistics, with working papers
4. Bank reconciliation
5. Bank statements
6. Checks/Warrants
7. Contracts
8. Correspondence
9. Deposit slips
10. Fixed assets inventory listings
11. Inventory count sheets
12. Invoices
13. Journal vouchers
14. Leave requests
15. Petty cash count sheets
16. Petty cash receipts
17. Petty cash reimbursement receipts
18. Pre-numbered cash receipt
19. Purchase orders
20. Support for sole-source-decisions
21. Telephone logs
22. Time sheets
23. Travel claims
24. Written policies

Maintain a current roster of grant or contract agreements. Include the following information for each grant:

1. Grantor
2. Federal grant number
3. Title of grant
4. Catalog of Federal Domestic Assistance (CFDA)
5. Period Covered
6. Approved budget (latest revision)
7. Grantor share
8. Match Requirements
9. Purpose of grant

Maintain a file on each grant. The file should contain at least the following items:

1. Grant agreement, including grant budget
2. All grant agreement amendments
3. Copy of periodic financial reports
4. Other pertinent information (e.g., correspondence, monitoring reports)

Maintain information on in-kind contributions and matching requirements by grant in separate file folders, as necessary.

# Chapter 11 Travel, Conferences and Meetings

Subrecipients must comply with all applicable laws, regulations, policies and official [DOJ Guidance](#) (for programs receiving VOCA, FVPSA STOP VAWA or SASP funds). This includes abiding by the [State of Iowa travel policies](#). Those traveling should pay close attention to rules regarding food and beverage purchases.

There are rules and forms regarding travel/training and the reimbursement of expenses for both in-state and out-of-state travel. See [Chapter II Post-award Requirements, Claims for Reimbursement, Expense Summary Forms](#).

# In-State Travel for Conferences/Trainings

[Registration Fees](#)

[Mileage Rate](#)

[Vehicle Expenses](#)

[Meal Rate](#)

[Lodging](#)

[Other Miscellaneous Expenses](#)

If in state travel expenses are included in a program's approved budget, programs do not need to ask prior permission to attend in state conferences, trainings, workshops or meetings as long as they align with victim services programming.

If in-state travel expenses are not included in a program's budget, the program will need to request a budget revision to travel in state. More information about [budget revisions is detailed in Chapter 19](#).

CVAD mandatory trainings, workshops, meetings or conferences and coalition meetings are allowable travel expenses and should be considered when completing program budgets especially if CVAD funds are to pay for those expenses.

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## Registration fees

Registration fees are allowable expenses.

Registration fees for a conference or training may be paid by the individual, or by the agency. A paid receipt must be furnished for reimbursement, if applicable. If no receipt is available, a printed copy of the registration form or electronic registration acknowledgement, matched with a copy of the canceled check (front and back) or credit card receipt with appropriate information on the credit card statement, will be accepted.

A copy of the registration form and the agenda, including information about any meal(s) provided, must be attached to the [Out-of-State Travel and In-State Travel Form](#) when applicable

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## Mileage

Staff may request mileage reimbursement through either the [Staff Mileage Payment Form](#) or the [Out-State Travel and In-State Travel Form](#) .

The [Staff Mileage Payment Form](#) is an appropriate form to use for grant staff who travel on a regular basis. Staff complete this form when requesting reimbursement for mileage only.

Other travel expenses, should be submitted on the [Out-of-State Travel and In-State Travel Form](#).

CVAD will reimburse mileage at the state rate in effect when the travel was taken. CVAD will notify agencies if the state rate changes; however, this change is not retroactive and would only affect future travel.

Agencies may lease vehicles; however, CVAD will only reimburse mileage for allowable grant activities. No expenses related to the cost of leasing vehicles will be reimbursed. Travel must be tracked on the appropriate forms and can be reimbursed at the state rate.

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## Vehicle Expenses

CVAD will not reimburse for gas, maintenance, insurance or other expenses associated with an agency or employee owned or leased vehicle. CVAD can reimburse mileage for agency or employee owned vehicles as long as the expenses are for allowable grant activities. CVAD will pay the state rate in effect at the time of travel. Employees are to complete the [Staff Mileage Payment Form](#) or [Out-of-State Travel and In-State Travel Form](#) for mileage reimbursement. An agency owned or leased vehicle must complete the [Vehicle Mileage Form](#). These forms will be submitted with claim reimbursement as required by the risk designation.

If a subrecipient chooses to rent a vehicle, CVAD will reimburse the lesser of rental car fees and costs of gas, or mileage at the current state rate. Receipts for gas must be included with the expense reimbursement claim form, as required by the risk designation.

### Example:

Event-Conference attendance.

Rent a vehicle for \$100/day + \$50 gas = \$150

Round trip mileage-200 miles. Mileage reimbursement would have been  $200 \times .39/\text{mile} = \$78$ .

The program would only be eligible for \$78 in reimbursement costs, as the rental car is not more cost effective.

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## Meal Reimbursement

All meals being claimed for reimbursement must have:

- an itemized receipt
- show the location of the meal (city/state)
- name of the restaurant
- date and time of meal.

Employees should complete a [Meal Reimbursement Form](#) that reflects actual meal receipt amounts before scanning, in order to have it correspond with your travel forms.

A charge card receipt that does not show the itemized food, drink and tax will not be accepted.

If an itemized receipt does not have the name or location of the restaurant, the traveler completing the [Out-of-State Travel and In-State Travel Form](#) must write on the receipt the name of the restaurant, location (city and state), date and time of meal and then sign (not initial) the itemized receipt.

If the copy of the itemized receipt is unreadable, the meal expense will be removed from the claim.

Tips are allowable with state and federal funds. Tips are allowable for no more than 15% of the food bill, up to the maximum allowed for reimbursement. The tip is to be calculated on the sub-total of eligible food and drink before the tax has been applied.

Staff will be reimbursed for meals only if they incur an overnight stay while performing their job duties.

- If meals are included in conferences fees or registration fees those expenses will be not reimbursed.

Please note in-service training for staff and volunteers do not count for reimbursement.

Breakfast will only be reimbursed if the traveler departs before 6:00 a.m. on the date of travel. Dinner will only be reimbursed if the traveler returns after 7:00 pm. To obtain updated meal reimbursement rates for in-state travel go to the [Iowa Department of Administrative Services](#) website.

No alcohol expenses will be reimbursed.

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## Lodging

Subrecipients will receive reimbursement for the actual costs of reasonable lodging accommodations, plus tax, not to exceed the [out of state city levels](#). Lodging receipts must show a zero balance. In addition, the lodging receipts/invoices must show the itemized expenses for each night of the travelers stay.

Subrecipients will not be reimbursed for lodging or other travel expenses unless these items are associated with:

- Attendance at the Statewide Coalition meetings as long as your home is not in the county hosting the meeting,
- Overnight travel, and/or
- Attendance at a full or multi-day conference or training.

Exceptions to these rules must be approved in advance by CVAD.

CVAD will not reimburse lodging expenses for conferences or training held within your agency's county.

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## Other Miscellaneous Expenses

Original receipts must be attached to the [Out-of-State Travel and In-State Travel Form](#) to receive reimbursement for other miscellaneous expenses, if applicable. Certain miscellaneous expenses are allowable such as airfare, parking, bus, cab, shuttle, luggage fee, registration and tolls.

Other miscellaneous items may be reimbursed if the CVAD deem them to be reasonable and appropriate, with adequate documentation.

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# Out of State Travel

All out-of-state travel **must be pre-approved** by Victim Assistance via Iowa GVS.

**Out of State Travel:** Subrecipients must submit an out of state travel request form to via Iowa GVS for out of state travel IF out of state travel is not included in the original budget; OR out of state travel is included in the original budget, but details about the travel are not provided. To request out of state travel through GVS, go to the grant application associated with the travel request and select initiate related document. Select out of state travel, then submit the completed form.

Detailed out of state travel in an approved budget means both the budget and the budget justification provide the name of the conference, training or meeting, known or estimated dates of travel, known or estimated costs for lodging, airfare, meals and registration and other costs necessary to travel.

Subrecipients must also request a budget revision if they did not include out of state travel in the original budget. Budgets with TBD or to be determined in the out of state travel category do not have to request a budget revision unless the amount originally budgeted is insufficient.

All subrecipients must use the state designated out-of-state meal rates, as summarized on the [Iowa Department of Administrative Services \(DAS\) website](#). Each city has a level and a meal reimbursement amount associated with it (1, 2, 3, 4). If a city is not listed, the level 1 tier should be used.

The requirements outlined in [In-State Travel](#) must be adhered to for out-of-state travel. The only exception is the meal rate changes for out-of-state travel.

# State of Iowa Travel Rules

All CVAD subrecipients are required to abide by the travel rules of the [Iowa Department of Administrative Services](#) unless specifically noted in other sections of the grants manual. These rules were summarized in earlier sections of this chapter. However, for more specific information on the topics, Programs may read the following information:

[Travel Policy and Procedure](#)

[In-State Travel Reimbursement Summary](#)

[Meal Receipt FAQs](#)

[Hotel, Motel and B&B Guide](#)

# Chapter 12 Property and Equipment

Subrecipients are required to be prudent in the acquisition and management of property purchased with state or federal funds. All purchases must follow the Procurement Standards located in [Chapter XIV. Procurement of Goods and Services](#). Purchasing new property when suitable property is already available for the successful execution of the project is considered an unnecessary expenditure.

# Definitions

**Real Property:** typically includes land and buildings.

**Personal Property:** includes both tangible personal property, which is classified as either equipment or supplies; and intangible personal property, which includes things having no physical existence, like trademarks, copyrights, and patents.

**Equipment:** is a tangible non-expendable personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit.

**Sensitive Minor Equipment:** is defined as moveable, high-risk, sensitive property items purchased with a per unit cost between \$500.00 and \$5,000.00, such as computers (i.e., laptops, tablets), TVs, projectors, cell phones and cameras acquired, used and managed for criminal justice and victim service grant purposes.

**Intangible Property:** includes trademarks, copyrights, and patents.

**\*\*\*Real property and intangible property are unallowable expenses with CVAD funding.**

# Inventory Control

Due diligence should take place before purchasing property and equipment in order to ensure it is needed and is not already available within your organization.

Subrecipients must have and follow their property and equipment policy and maintain supporting documentation to avoid incurring property and equipment costs that are later disallowed (e.g., acquiring unreasonable, duplicative, or unnecessary property).

CVAD recommended inventory control include:

- Keep an up to date equipment inventory (For CVAD requirements see [Management and Oversight of Equipment](#))
- Employ effective management techniques for determining property/equipment is needed.
- Initiate a screening process to ensure effective controls are in place for property management.

# Documentation

Receipts or invoices with order dates are required on all equipment purchased with grant funds. Documentation of equipment purchased and supporting receipts should also be maintained to provide for easier documentation on the annual [Project Equipment Summary Report](#), which requires a listing of all equipment purchased via grant funds during the year. Save a copy of the completed report in the grant file.

Purchases with a unit cost greater than \$5,000 must have at least three written bids or quotes prior to purchase. The quotes or bids must be submitted to CVAD with reimbursement request if risk designation requires it, or at the discretion of CVAD. These quotes should be kept on file for audit purposes. The invoice copy or receipt must be submitted to CVAD with reimbursement, regardless of risk designation.

Subrecipients must retain records for equipment, non-expendable personal property, and real property for a period of 5 years from the date of disposition, replacement, or transfer at the discretion of the awarding agency. If any litigation, claim, or audit is started before the expiration of the 5-year period, a subrecipient must retain records until all litigation, claims, or audit findings involving the records have been resolved.

# Management and Oversight of Equipment

Equipment and sensitive minor equipment must be reported on the [Project Equipment Summary Report](#). This report is due every October 31 and sent via email to your CVAD contact person.

Agencies must have procedures for managing equipment and sensitive minor equipment (including replacement). Agency inventory records must identify the source(s) of funding used to purchase equipment and include at a minimum, the following:

Equipment and sensitive minor equipment records must include:

- Purchasing federal grant award number
- Description of the property
- Serial number or other identification number
- Identification of who holds the title
- Acquisition date
- Cost of the property
- Percentage of Federal participation in the cost of the property
- Location of property
- Use and condition of property
- Disposition data including the date of disposal and sale price and justification

A physical inventory of the property must be taken, and the results reconciled with the property records at least once every two years.

A control system must exist to ensure adequate safeguards to prevent loss, damage or theft of property.

Subrecipients must notify CVAD within 30 business days of discovery when there is loss, damage or theft of equipment or sensitive minor equipment if grant funds paid for the equipment or minor equipment.

Any loss, damage, or theft shall be investigated by the subrecipient, as appropriate. Subrecipients are responsible for replacing or repairing property that is willfully or negligently lost, stolen, damaged, or destroyed. Any loss, damage, or theft of the property must be investigated and fully documented and made part of the official project records.

Adequate maintenance procedures must exist to keep the property in good condition.

If the subrecipient is authorized or required to sell the property, proper sales procedures must ensure the highest possible return; see [Disposition](#).

# Disposition

Whenever a subrecipient wishes to dispose of surplus equipment purchased with grant funds, or change its use, the equipment must be returned to CVAD or be disposed of within the guidelines of the program. Equipment with a current per unit fair market value of \$5,000 or less may be retained, sold or otherwise disposed of with no further obligation to CVAD or Federal awarding agency. Equipment with a current per-unit fair-market value in excess of \$5,000 may be sold with the proceeds of the sale being multiplied by the awarding agency's share of the equipment, with that amount to be returned to the CVAD.

Any equipment (i.e. phones, tablets, laptops, etc.) containing personally identifying client information must be deleted in accordance with industry standards, from the device prior to destruction, or sale. For questions about how to meet this standard, please contact CVAD.

There is no time limit on this requirement. Contact CVAD for guidance when disposing of equipment purchased with grant funds.

In the event of the termination or grant closure of a CVAD grant prior to the end of the grant term, programs should contact VSS Program Staff for instructions regarding equipment disposition.



# Reporting Purchase

Subrecipients shall complete the [Project Equipment Summary Report](#) for all CVAD grants. This form is a list of equipment purchased during each fiscal year and is completed on an annual basis only if equipment is purchased with CVAD funds. This form is due to CVAD with the final claim of the annual contract period. Save a copy of the completed report in the grant file.

# Equipment Acquired with Specific Federal Formula Funds

Additional information and requirements for equipment acquired with federal formula funds administered by CVAD can be found in the [DOJ Grants Financial Guide](#). Information on specific federal formula funds can be found at the following links:

- [Sexual Assault Services Grants \(SASP\)](#)
- [STOP Violence Against Women Act Grants \(VAWA\)](#)
- [Victims of Crime Act Grants \(VOCA\)](#)
- [Family Violence Prevention and Services \(FVPSA\)](#)

# Chapter 13 Printing, Publications & Media

Requirements for printing, publishing and media vary based on the federal, or state funding source used to support the expenses. Prior approval from the Crime Victim Assistance Division should be sought whenever there is question about the allowability of what's being created and for guidance on appropriate language required to be printed on the publication.

# Printing

The costs of electronic and print media, including distribution, promotion, and general handling, are allowable.

If these costs are not identifiable with a particular project or cost activity, the costs should be allocated as indirect costs to all benefiting activities of the organization.

All electronic and print media prepared and released by the agency shall include the statement:

“This project is funded under an agreement with the State of Iowa.”

NOTE: Subrecipients will only use this generic publication statement if the federal or state grant funds do not require a specific statement. Refer to the Publication and Media sections of this chapter.

# Publications

[OJP \(OVW\) Guiding Principles for STOP VAWA & SASP Funds](#)  
[OJP Training Guiding Principles](#)

STOP VAWA, VOCA, FVPSA and SASP funds cannot be used for research; however, these funds can be used for program assessment or program evaluation.

The following information is from the [DOJ Financial Guide](#) Postaward Requirements 3.9 allowable costs, page 75.

To be considered allowable, publication costs must be incurred for work done according to a process that the recipient has described in writing. This process should include writing, editing, and preparing the illustrated material (including videos). Alternatively, it may include only the internal printing requirements from the recipients/subrecipients in accordance with the terms of the project.

DOJ has authorized any recipient or subrecipient employee to make or have made by any means available to him or her, without regard to the journal copyright and without royalty, a single copy of any such article for his or her own use. Recipients are encouraged to make the results and accomplishments of their activities available to the public. Recipients publicizing project activities and results must adhere to the following parameters:

- Responsibility for the direction of the project should not be ascribed to the Department of Justice, (or the Department of Health and Human Services, or the Office of Violence Against Women as appropriate in lieu of the Department of Justice) or the Iowa Crime Victim Assistance Division. The publication must not convey DOJ/DHHS/OVW or IA CVAD's official recognition or endorsement of the project simply by having received funding. A separate request of the State and appropriate federal agency must be made and granted for official recognition.
- The publication must include the following statement: "The opinions, findings, and conclusions or recommendations expressed in this publication/program/exhibition are those of the author(s) and do not necessarily reflect the views of the Department of Justice or grant-making component."
- All reports, studies, notices, informational pamphlets, press releases, signs, billboards, DVD's, public awareness kits, training curricula, webinars, websites and similar public notices (written, visual or sound) prepared and released by the program shall include the below statement if the federal or state grant funds do not require a specific statement:

"This project is funded under an agreement with the State of Iowa by Award No. \_\_\_\_\_ awarded by the (name of the specific office/bureau), Department of Justice."

\*\*See OVW requirements for notices when STOP VAWA funds are used below.

\*\*Any such notices by the program shall be approved by the State.

- The publication must not convey DOJ's official recognition or endorsement of the recipient's project simply based on having received funding.
- Recipients may file a separate application with the grant-making component requesting official recognition.

Recipients and any subrecipients are expected to publish or otherwise make widely available to the public, as requested by the awarding agency, the results of work conducted or produced under an award.

All publication and distribution agreements with a publisher must include provisions giving the Federal Government a royalty-free, non-exclusive, and irrevocable license to reproduce, publish, or otherwise use and to authorize others to use the publication for Federal Government purposes (see Chapter 3.7). The agreements with a publisher should contain information on the awarding agency requirements.

Unless otherwise specified in the award, recipients/subrecipients may copyright any books, publications, films, or other copyrightable material developed or purchased as a result of award activities. Copyrighted material will be subject to the same provisions giving the Federal Government a license as described above.

A publication and distribution plan should be submitted to the awarding agency before materials developed under an award are commercially published or distributed. The plan must include a description of the materials, the rationale for commercial publication and distribution, the criteria to be used in the selection of a publisher, and—to assure reasonable competition—the identification of firms that will be approached.

Recipients/subrecipients must obtain prior agency approval of this plan for publishing project activities and results when it uses Federal funds to pay for the publication.

Guidance for publication costs is set out in 2 C.F.R. § 200.461.

### **§200.461 Publication and printing costs.**

Publication costs for electronic and print media, including distribution, promotion, and general handling are allowable. If these costs are not identifiable with a particular cost objective, they should be allocated as indirect costs to all benefiting activities of the non-Federal entity.

Page charges for professional journal publications are allowable when

1. The publications report work supported by the Federal Government; and
2. The charges are levied impartially on all items published by the journal, whether or not under a Federal award.
3. The non-Federal entity may charge the Federal award before closeout for the costs of publication or sharing of research results if the costs are not incurred during the period of performance of the Federal award.

All reports, studies, notices, informational pamphlets, press releases, signs, billboards, DVDs, public awareness kits, training curricula, webinars, websites and similar public notices (written, visual or sound) prepared and released by the program shall include the below statement if the federal or state grant funds do not require a specific statement:

“This project is funded under an agreement with the State of Iowa.”

Any such notices by the program shall be approved by the State.

## **OJP (OVW) Guiding Principles for STOP VAWA & SASP funds:**

Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the [OJP Training Guiding Principles for Grantees and Subgrantees](#).

Subgrantee agrees all materials and publications (written, visual or sound) resulting from award activities shall contain the following statements: “This project was supported by Subgrant No. \_\_\_\_\_ awarded by the state administering office for the STOP Formula Grant Program/SASP Formula Grant Program. The opinions, findings, conclusions, and recommendations expressed in this publication/program/exhibition are those of the author(s) and do not necessarily reflect the view of the Department of Justice, Office on Violence Against Women.”

Subgrantee agrees one copy of all reports and any other written materials or products that are funded under the project to Federal Office on Violence Against Women by submitting it to the Iowa Attorney General's Crime Victim Assistance Division not less than 30 days prior to public release. If the written material is found to be outside the scope of the program or in some way to compromise victim safety, it will need to be revised to address these concerns or the funded program will not be allowed to use STOP funds to support the

further development or distribution of the materials.

All materials and publications (written, visual, or sound) resulting from the award activities shall contain the following statements: "This project was supported by subgrant No. \_\_\_\_\_ awarded by the state administering office for the SASP Formula Grant Program. The opinions, findings, conclusions, and recommendations expressed in this publication/program/exhibition are those of the author(s) and do not necessarily reflect the views of the U.S. Department of Justice, Office on Violence Against Women.

Subgrantee agrees that any training or materials developed or delivered with funding provided under this award must adhere to the OVW Training Guiding Principles for Grantees and Subgrantees, available at [OVW Training Guiding Principles Grantees and Subgrantees](#).

## OJP Training Guiding Principles

Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the [OJP Training Guiding Principles for Grantees and Subgrantees](#).

The subrecipient will submit one copy of all reports and any other written materials, or products to CVAD no less than 30 days prior to public release. If the written material is found to be outside the scope of the program, deemed inappropriate, or in some way compromises victim safety, it will need to be revised to address these concerns, or the funded program will not be allowed to use the relevant CVAD federal or state funds to support further development, or distribution of the materials.

All publication and distribution agreements with a publisher will include provisions giving the Federal government a royalty-free, non-exclusive, and irrevocable license to reproduce, publish, or otherwise use and to authorize others to use for Federal government purposes

Additionally, studies and research/report type publications expressing the direction of project activity must also contain the following federal funding statement:

***"The opinions, findings, conclusions or recommendations contained within this document are those of the author and do not necessarily reflect the views of the Department of Justice (or Department of Health and Human Services, Office of Violence Against Women, Office for Victims of Crime as appropriate) or the State of Iowa, Crime Victim Assistance Division"***

# Media

## Advertising and public relations (§200.421)

a. The term advertising costs means the costs of advertising media and corollary administrative costs. Advertising media include magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittals, and the like.

b. The only allowable advertising costs are those used solely for:

1. The recruitment of personnel required by the non-Federal entity for performance of a Federal award (See also §200.463 Recruiting costs);
2. The procurement of goods and services for the performance of a Federal award;
3. The disposal of scrap or surplus materials acquired in the performance of a Federal award except when non-Federal entities are reimbursed for disposal costs at a predetermined amount; or
4. Program outreach and other specific purposes necessary to meet the requirements of the Federal award.

c. The term “public relations” includes community relations and means those activities dedicated to maintaining the image of the non-Federal entity or maintaining or promoting understanding and favorable relations with the community or public at large or any segment of the public.

d. The only allowable public relations costs are:

1. Costs specifically required by the Federal award;
2. Costs of communicating with the public and press pertaining to specific activities or accomplishments which result from performance of the Federal award (these costs are considered necessary as part of the outreach effort for the Federal award); or
3. Costs of conducting general liaison with news media and government public relations officers, to the extent that such activities are limited to communication and liaison necessary to keep the public informed on matters of public concern, such as notices of funding opportunities, financial matters, etc.

e. Unallowable advertising and public relations costs include the following:

1. All advertising and public relations costs other than as specified in paragraphs (b) and (d) of this section;
2. Costs of meetings, conventions, convocations, or other events related to other activities of the entity (see also [§200.432 Conferences](#)), including:
  - (i) Costs of displays, demonstrations, and exhibits;
  - (ii) Costs of meeting rooms, hospitality suites, and other special facilities used in conjunction with shows and other special events; and
  - (iii) Salaries and wages of employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings;
3. Costs of promotional items and memorabilia, including models, gifts, and souvenirs;
4. Costs of advertising and public relations designed solely to promote the non-Federal entity.



# Chapter 14 Procurement of Goods and Services

Subrecipients must have written purchasing policies. Subrecipients shall follow the same policies and procedures it uses for procurement from its non-CVAD funds. Each agency shall ensure every purchase order or other contract includes any clauses required by Federal statutes and executive orders, their implementing regulations, and the grant contract provisions.

# Procurement Standards

Subrecipients shall use their own procurement procedures and regulations, provided that the procurement conforms to applicable federal law and the standards identified in the Procurement Standards Sections of [CFR 200.317-200.326](#). This section of the CFR (search for sections 317 after you open the document) details what needs to be in an agency's procurement policy.

Any agency, whose procurement system has been certified by a federal agency, is not subject to prior approval requirements of 28 CFR Parts 200. CVAD's prior approval will only be required for areas beyond limits of the subrecipient certification. Highlights include but are not limited to:

- Cost and Price Analysis (2 CFR, Section 200.323): Describe the process for performing a cost or price analysis for every procurement action in excess of the small purchase threshold (phone bids, 3 quotes, etc.).
- Noncompetitive Procurement (2 CFR, Section 200.320[f]): Describe the process for procuring goods and/or services that cannot be conducted through normal competitive procurement methods, including emergency or sole source procurement.
- Small Purchase Procedures (2 CFR, Section 200.320[b]): Describe the process for procuring goods, and/or services when the total dollar amount is less than your program's relevant small purchase threshold per procurement transaction.
- Formal Purchase Procedures (2 CFR, Section 200.320[c] and [d]): Describe the process for procuring goods and/or services when the dollar amount is more than your program's relevant small purchase threshold per procurement transaction.
- Duplication of Goods/Services (2 CFR, Section 200.318[d]): Describe the process used to ensure that there is no acquisition of unnecessary or duplicate goods or services.
- Gratuities, Favors, or Gifts (2 CFR, sections 200.318[c][1] and 400.2): Include a prohibition on soliciting or accepting gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub agreements. Agencies may define a set of standards for situations in which financial interest or gratuity is not substantial or the gift is an unsolicited item of nominal value. If the latter is chosen, include the definition of nominal value.

# Adequate Competition

All procurement transactions, whether negotiated or competitively bid and without regard to dollar value shall be conducted in a manner so as to provide maximum open and free competition. Interagency agreements between units of local government are excluded from this provision.

Subrecipients must not create unreasonable restrictions on competition under the award. This applies with respect to any procurement of property or services that is funded (in whole or in part) by CVAD funds, regardless of the dollar amount of the purchase or acquisition, the method of procurement, or the nature of any legal instrument used as noted in (DOJ) Part 200 Uniform Requirements--including as set out at 2 C.F.R. 200.300. No subrecipient may, in any procurement transaction, discriminate against any person or entity on the basis of such person's or entity's status as an "associate of the federal government," or on the basis of such person or entity's status as a parent, affiliate, or subsidiary of such an associate, except as expressly set out in 2 C.F.R. 200.319(a), or as specifically authorized by the US Department of Justice.

# Non-Competitive Practices

Each subrecipient shall be alert to organizational conflicts of interest or non-competitive practices among contractors that may restrict or eliminate competition or otherwise restrain trade. Contractors that develop or draft specifications, requirements, statements of work, and/or Requests for Proposals (RFP's) for a proposed procurement shall be excluded from bidding or submitting a proposal to compete for the award of such procurement. Any request for exemption must be submitted in writing to CVAD.

# Chapter 15 Procurement of Professional Services

Professional service subcontracts must be developed and implemented whenever the subrecipient uses grant funds to pay for direct services for clients that the subrecipient's staff will not provide.

# Contractor and Consultant Agreements

When an agency determines it is appropriate to pay another entity for goods or services using federal grant funding, the agency must have contractual documents in place prior to entering into a relationship with the entity.

First, the program must decide what type of contracting relationship exists based on the nature of the agreement and the criteria in the Uniform Requirements. [See 2 CFR §200.330, section 200.22 and section 200.92.](#) (After opening the link search for 200.330).

**Subrecipient:** You have a subrecipient relationship with another entity when the entity:

1. Has the ability or authority to determine who is eligible to receive assistance;
2. Has its performance measured against whether the objectives of the state/federal program are met;
3. Has responsibility for programmatic decision-making
4. Has responsibility for adherence to applicable state/federal program compliance responsibilities;
5. Uses grant funding to carry out a program of the organization rather than just providing goods and services.

**\*All subrecipient relationships must be pre-approved prior to a program entering into a contract.**

**Contractor:** Contractors are also called vendors. Contractors provide goods and services within normal business operations; provide similar goods and services to different purchasers; operate in a competitive environment; provide goods and services that are ancillary to the operation of the grant funded program; and are not subject to compliance requirements.

**Professional Services:** Professional services are unique, technical or infrequent functions performed by an outside contractor (vendor), qualified by education, experience or technical skills and abilities. Examples of professional services include but are not limited to, laboratory analysis, project evaluation, marketing, auditing, translation/interpretation and website development.

**Consultants:** Consultants are experts or people who hold special knowledge or skills, or who give professional or legal advice. Consultants are hired on a contractual basis and are not employees of your agency.

# Types of Agreements

## Subaward

A subaward is an award provided by a pass-through entity to a subrecipient to carry out a project. The award document from the Attorney General's Office to an agency is a first tier subaward. If an agency awards a portion of its subaward to another entity to do programmatic work, that entity is a second tier subrecipient. Subawards do not include payments to contractors or individuals. A subaward may be any form of legal agreement and is considered a contract. Subawards must include scope of work, budget, reporting requirements and federal pass through requirements and certified assurances. Subawards require the use of the [Subcontract Monitoring Form](#). Prior approval is required prior to issuing a subaward. The subaward must be included in your program budget and detailed in your budget justification. If you wish to add a subaward to your project after your budget is approved, you must obtain prior approval via a [budget modification request](#).

## Contracts

A contract is a legal instrument by which an agency purchases goods or services needed to carry out the funded project. The Attorney General's office requires programs to use professional fee-for-service contracts for direct services to clients such as counseling services, legal services, etc. when these services are not provided by program staff. Vendor contracts are used to purchase goods and services NOT directly linked to client services, such as lawn care services, copier agreements, cleaning contracts, etc. Vendor contracts and professional fee-for-service contracts do not require a detailed budget; however, they are to include costs aligned to tasks, services or deliverables. Subrecipients are required to provide oversight of vendor contracts and fee-for-service contracts. However, the use of the [Subcontract Monitoring Form](#) is not required.

Subrecipients must adhere to their procurement policies when securing professional services. For more information concerning non-profit competitive bidding for professional services go to [Not-for-Profit Agency Record Keeping Document](#).

Subrecipients using subcontracted professional services must be in compliance with all IRS requirements.

Subrecipients are accountable for the work and performance of their contractors and subrecipients. Subrecipients must keep a file, on-site, that includes the original professional service subcontract and approved budget information.

Subrecipients should enter subawards and contracts in the contractual services budget line and provide detailed budget justification for these costs on the budget justification form.

# Consultant Rates of Payment

Consultant rates of payment are to be reasonable and consistent with fees for similar services in the market place. The consultant rate maximum limit is \$650 per day or \$81.25 per hour. This does not mean the rate can or should be the maximum limit for all consultants. Rates should be established on a case-by-case basis and must be reasonable and allowable. Consultant rates should be consistent with current market value for the service. The consultant rate agreement file must contain a justification of the agreed upon rate, the contract, copies of invoices and copies of work performed.

If a grantee wishes to exceed the maximum daily rate allowed (excluding travel and travel-related costs – see [Chapter XI – Travel, Conferences, Meetings](#) for consultants, prior written authorization is required. The term daily rate refers to an eight-hour day. An eight-hour day may include preparation, evaluation, and travel time in addition to the time required for actual performance. Please note, however, this does not mean the rate can exceed the maximum daily rate allowed. If a consultant's rates are greater than the maximum rates allowed no portion of the consultant's fees can be paid with federal funds, not even the portion that meets the federal standards.

**Independent Consultants:** The rate of compensation for these individuals must be reasonable and consistent with that paid for similar services in the market place. Compensation may include the value or the cost of fringe benefits. Resources to determine current market value include:

- Current salary & fringe benefits for similar work
- Competitive contract bids
- [The Bureau of Labor Statistics Wage Data by Area and Occupational website](#)



# Oversight of a Professional Services Contract (Subcontract)

[Programmatic Monitoring](#)  
[Fiscal Monitoring](#)

Your agency must have a process for approving, revising, and monitoring external funds (subawards and contracts). Monitoring policies should clearly address both program and fiscal monitoring of professional services subcontracts.

The [Subcontract Monitoring Form](#) should be used to record appropriate test work and conclusions and retained as evidence of monitoring a grant-funded subaward. Subaward monitoring must be conducted by the agency within 6 months of the subcontract start date and then again periodically for multi-year Project-Based Professional Service Subcontracts. The completed form should be retained in the grant file and available for inspection.

State agencies should follow and use state and internal monitoring policies and forms.

## Programmatic Monitoring

Determines if service delivery is consistent with subaward provisions. Programmatic monitoring may include any or all of the following:

- Verify the work being sub-awarded is satisfactorily being completed by reviewing reports and other materials, as well as maintaining contact with the sub-awardee;
- Interviewing direct services staff and others to determine if the services are being performed according to the contract, and/or
- Conducting on-site reviews to check the nature and quality of the services being provided.

## Fiscal Monitoring

Examines the subrecipient's financial records and procedures as they pertain to the sub-award. Fiscal monitoring may include any or all of the following:

- Reviewing invoices submitted to the subrecipient agency;
- Comparing the sub-award budget to the actual costs;
- Obtaining reasonable documentation that services billed were actually delivered according to the sub-award; and/or comparing invoices with supporting documentation to determine costs were allowable.

# Chapter 16 Allowable Costs

Allowable costs are identified in the [Federal Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#) and in the grant program's authorizing legislation. Costs must be reasonable, allocable, necessary to the project, consistently applied and comply with the funding statute requirements. In addition to the allowable costs outlined in the relevant [CVAD Fund Sources](#), discussions of certain elements of the following costs are listed in this chapter.

# Conferences, Meetings and Training Activities

Cost thresholds and limitations are in place for the following items:

- Meeting room/audio visual services must be pre-approved.
- Logistical Planners are RARELY ALLOWABLE.
- Programmatic Planners are RARELY ALLOWABLE.

All contracts for events that include lodging for 30 or more participants must not exceed the State of Iowa rate for [lodging](#). In the event the lodging rate is more than the State per diem rate, none of the lodging costs associated with the event are allowable costs to the award. Exceptions can be made but require prior approval by the VSS Administrator. Without prior approval, the recipient would be required to pay for all lodging costs for the event, not just the amount in excess of the State per diem. For example, if the State per diem for lodging is \$65 per night, and the event lodging rate is \$100 per night, the recipient must pay the full \$100 per night with non-Victim Assistance funds, not just the difference of \$35 per night.

# Food and Beverage

Food and beverage costs for are rarely allowable. See specific [Fund Source chapter](#) for more information. Food for victims are generally allowed.

# Space

The cost of space in privately - or publicly - owned buildings used for the benefit of the program is allowable, subject to the conditions stated below:

The total cost of space may not exceed the rental cost of comparable space and facilities in a privately-owned building in the same locality. The cost of space procured for program usage may not be charged to the program for periods of non-occupancy, without authorization of the Federal-awarding agency.

- **Cost of Space:** The rental cost of space in a privately-owned building is allowable. Rent cannot be paid if the building is owned by the grantee or if the grantee has a substantial financial interest in the property.
- **Maintenance and Operation:** Utilities, property insurance, security, janitorial services, elevator services, upkeep of grounds, normal repairs and alterations, and the like are allowable to the extent they are not otherwise included in rental or other charges for space.
- **Occupancy of Space under Rental-Purchase or a Lease with Option-to-Purchase Agreement:** The cost of space procured under such arrangements is allowable when specifically approved.
- **Depreciation and Use Allowances on Publicly-Owned Buildings:** Depreciation or a use allowance on idle or excess facilities is NOT ALLOWABLE.

# Software Development

Software development is an allowable cost and may be expended in the period incurred.

# Post-Employment

If an organization has written policies which clearly describe post-employment benefits, payout of post employment benefits are allowed. These benefits are likely accrued leave time; however could include other benefits as long as they are fully described in the organizational policy manual. These costs must be shared or allocated with other funding sources if applicable. Severance payouts are not allowed with grant funds.

# General Salaries and Personnel Costs

Payment of personnel costs, generally salaries and benefits are allowable if costs are a part of an approved project budget and are necessary for the project. Most personnel costs should be for direct victim services to victims of crime. A **limited** amount of personnel costs can be allocated to administration and prevention work, depending on the funding sources awarded. Fundraising costs can **never** be charged to any federal source. Overtime is allowed per organizational policies and procedures and as required by federal labor laws. Bonuses cannot be charged to any Attorney General's Office grant nor can they be used as match.



# Consultant Fees

See [Chapter XV: Procurement of Professional Services](#) of the CVAD Grant Administrative Manual for allowable rates.

# Equipment, Software, and Hardware

Equipment and hardware expenses which are part of an approved project and are necessary and incidental to that project, are allowable expenses. Equipment is defined as tangible non-expendable personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit; or Sensitive Minor Equipment defined as moveable, high-risk, sensitive property items purchased with a cost between \$500.00 and \$5,000.00, such as computers (i.e., laptops, tablets), TVs, and cameras, acquired, used and managed for criminal justice and victim services grant purposes. See [Chapter XII: Property and Equipment](#) of the CVAD Grant Administrative Manual for further details.

# Travel

Travel is an allowable expense. Grantees must follow the State of Iowa travel policies. Exceptions may be made on a case-by-case basis with prior CVAD approval. For more information on Iowa travel policies, go to [Iowa Department of Administrative Services Website](#).

# Indirect Costs

Indirect costs are allowable. For more guidance, see [Chapter III Financial Requirements-section j-Indirect Costs](#).

If your agency has a federally negotiated indirect rate, the agreement must be included as part of your grant application or sent to your grants specialist. If your agency does not have a federally negotiated indirect rate and wishes to use the de minimis rate of 10%, the agency must notify CVAD by completing the [CVAD Indirect Costs Rate Form](#) and include it with the grant application email it to your grants specialist.

# Grant Scope and Budget Modifications

Subrecipients must obtain prior written approval from CVAD for any change in program narrative or scope of services. Program and budget revisions are not automatic. Budget revisions may be considered for minor changes from what was originally submitted and approved in the grant application. Budget revisions are requested by outlining how much a grantee is asking to move, from one budget line item (payroll, benefits, travel, communications, etc.) to another, why the funds are available to move and how will this impact the goals/objectives outlined in the grant application (grant scope revision). For details on how and when to submit revisions, see [Chapter 19-Grant Scope and/or Budget Modifications](#).

The following budget items must be approved prior to changes by the grantee if not already included in the approved budget:

- Capital Purchases
- Equipment & Sensitive Minor Equipment – see [Chapter 12 Property and Equipment](#) of the CVAD Administrative Grant Manual for further details
- Furniture
- Clothing and/or Uniforms (Exception: Emergency clothing for victims/clients does not require prior approval.)
- Meeting room/audio visual services
- Indirect Cost – Funds may not be moved into or out of Indirect Costs without prior approval. The request must be accompanied by a copy of the agency's approved indirect cost rate or approved Cost Allocation Plan, which includes an indirect rate. Typically, the indirect cost rate approved through the grant application process is the rate that will be honored throughout the project period (typically three years). CVAD has the discretion to decline to honor an increased rate if CVAD determines the new rate significantly diminishes the ability of the program to carry out the project service goals and objectives. An increased rate will not result in an increased CVAD award amount.

NOTE: THIS LIST IS NOT ALL-INCLUSIVE. For further clarification, subrecipients should check the specific fund source in [Chapter 25 CVAD Fund Sources](#) for additional allowable and unallowable costs.

Visit the [DOJ Grants Financial Guide – Allowable Costs](#) for additional information.

# Chapter 17 Unallowable Costs

Crime Victim Assistance Division (CVAD) fund sources pay for varying costs associated with direct service provision to victims of crime. Unallowable costs are those expenses which cannot be charged to a grant nor can they be used for match.

Note: The lists provided in this chapter may not be all-inclusive. Additional information regarding unallowable costs can also be found in the Department of Justice- [DOJ Grants Financial Guide – Unallowable Cost](#) section.

# Construction

Use of CVAD grant funds for construction projects is prohibited.

# Land Acquisition

Land acquisition costs are unallowable.



# Supplanting

Federal funds cannot be used to supplant state or local funds. Supplanting occurs when federal funds are used to replace state or local funds that would, in the absence of such federal aid, be made available for law enforcement, criminal justice, system improvement and victim compensation and assistance. All applicants must certify formula grant money will be used to increase the amount of funds available for the applicable victim service activity or criminal justice system activity.

# Compensation of Federal Employees

Salary payments, consulting fees, or other enumeration of full-time federal employees are unallowable costs.

# Travel of Federal Employees

Costs of transportation, lodging, subsistence, and related travel expenses of awarding agency employees are unallowable charges. Travel expenses of other federal employees for advisory committee or other program or project duties or assistance are allowable if they have been:

- Approved by the federal employee's department or agency; and
- Included as an identifiable item in the funds budgeted for the project or subsequently submitted for approval.

# Bonuses or Commissions

Bonuses to staff, officers or board members of profit or non-profit organizations are unallowable. The recipient or subrecipient is prohibited from paying any bonus or commission to any individual or organization for the purpose of obtaining approval of an application for award assistance. Bonuses to officers or board members of profit or nonprofit organizations are determined to be a profit or fee and are therefore unallowable.

# Lobbying

All subrecipients must comply with the provisions of the government-wide Common Rule on Restrictions on Lobbying, as appropriate.

The following lobbying cost prohibitions are applicable to all subrecipients:

- Attempting to influence the outcome of any federal, state, or local election, referendum, initiative, or similar procedure, through in-kind or cash contributions, endorsements, publicity, or similar activity.
- Establishing, administering, contributing to, or paying for the expenses of a political party, campaign, political action committee, or other organization established for the purpose of influencing the outcome of elections.
- Attempting to influence: (a) the introduction of federal or state legislation; or (b) the enactment or modification of any pending federal or state legislation through communication with any member or employee of the congress or state legislature (including efforts to influence state or local officials to engage in similar lobbying activity), or with any government official or employee in connection with a decision to sign or veto any legislation.
- Publicity or propaganda purposes designed to support or defeat legislation pending before legislative bodies.
- Paying, directly or indirectly, for any personal service, advertisement, telegram, telephone, letter, printed or written matter, or other device, intended or designed to influence in any manner a member of congress or a state legislature, to favor or oppose, by vote or otherwise, any legislation or appropriation by either congress or a state legislature, whether before or after the introduction of any bill or resolution proposing such legislation or appropriation.
- Engaging in legislative liaison activities, including attendance at legislative sessions or committee hearings, gathering information regarding legislation, and analyzing the effect of legislation, when such activities are carried out in support of or in knowing preparation for an effort to engage in unallowable lobbying.
- Paying a publicity expert.
- The Anti-Lobbying Act, 18 U.S.C. § 1913, recently was amended to expand significantly the restriction on use of appropriated funding for lobbying. This expansion also makes the anti-lobbying restrictions enforceable via large civil penalties, with civil fines between \$10,000 and \$100,000 per each individual occurrence of lobbying activity. These restrictions are in addition to the anti-lobbying and lobbying disclosure restrictions imposed by 31 U.S. C. § 1352.

See [28 C.F.R. Part 69](#) for DOJ grantees. However, in the interest of full disclosure, all subrecipients understand that no federally appropriated funding made available under this grant program may be used, either directly or indirectly, to support the enactment, repeal, modification, or adoption of any law, regulation, or policy, at any level of government, without the express approval of CVAD. Any violation of this prohibition is subject to a minimum \$10,000 fine for each occurrence.

# Fundraising

Fundraising with federal dollars is prohibited. Fundraising costs include organizing financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions. Neither the salary of persons engaged in fundraising activities, nor indirect costs associated with those salaries may be charged to a federal award. CVAD will allow a program to allocate the equivalent of 20% of one FTE for fundraising from state funds. Programs can also use other non-federal funds to pay for fundraising.

- A program may accept donations (i.e., goods, space, services) as long as the value of the donations is not charged as a direct or indirect cost to the grant.
- A program may also expend funds, in accordance with approved award terms, to seek future funding sources to “institutionalize” the project, but not for the purpose of raising funds to finance related or complementary project activities.

# Corporate Formation

The costs for corporate formation are not allowed.

# Taxes (including Value Added Tax) §200.470

## 1. For states, local governments and Indian tribes:

- Taxes that a governmental unit is legally required to pay are allowable, except for self-assessed taxes that disproportionately affect Federal programs or changes in tax policies that disproportionately affect Federal programs.
- Gasoline taxes, motor vehicle fees, and other taxes that are in effect user fees for benefits provided to the Federal Government are allowable.
- This provision does not restrict the authority of the Federal awarding agency to identify taxes where Federal participation is inappropriate. Where the identification of the amount of unallowable taxes would require an inordinate amount of effort, the cognizant agency for indirect costs may accept a reasonable approximation thereof.

## 2. For nonprofit organizations and IHEs:

- (1) In general, taxes which the non-Federal entity is required to pay and which are paid or accrued in accordance with GAAP, and payments made to local governments in lieu of taxes which are commensurate with the local government services received are allowable, except for:
  - (i) Taxes from which exemptions are available to the non-Federal entity directly or which are available to the non-Federal entity based on an exemption afforded the Federal Government and, in the latter case, when the Federal awarding agency makes available the necessary exemption certificates,
  - (ii) Special assessments on land which represent capital improvements, and
  - (iii) Federal income taxes.
- (2) Any refund of taxes, and any payment to the non-Federal entity of interest thereon, which were allowed as Federal award costs, will be credited either as a cost reduction or cash refund, as appropriate, to the Federal Government. However, any interest actually paid or credited to a non-Federal entity incident to a refund of tax, interest, and penalty will be paid or credited to the Federal Government only to the extent that such interest accrued over the period during which the non-Federal entity has been reimbursed by the Federal Government for the taxes, interest, and penalties.

## 3. Value Added Tax (VAT):

- Foreign taxes charged for the purchase of goods or services that a non-Federal entity is legally required to pay in country is an allowable expense under Federal awards. Foreign tax refunds or applicable credits under Federal awards refer to receipts, or reduction of expenditures, which operate to offset or reduce expense items that are allocable to Federal awards as direct or indirect costs. To the extent that such credits accrued or received by the non-Federal entity relate to allowable cost, these costs must be credited to the Federal awarding agency either as costs or cash refunds. If the costs are credited back to the Federal award, the non-Federal entity may reduce the Federal share of costs by the amount of the foreign tax reimbursement, or where Federal award has not expired, use the foreign government tax refund for approved activities under the Federal award with prior approval of the Federal awarding agency.



# Conferences, Meetings, and Training Activities

Unallowable costs include:

- Entertainment
- Sports
- Visas
- Passport Charges
- Bar Charges/Alcoholic Beverages
- Laundry Charges
- Lodging costs in excess of [State per diem](#): For events of 30 or more participants that are funded with a CVAD award, if lodging costs exceed the State per diem, none of the lodging costs are allowable.
- Food and beverage costs are rarely allowable. See [specific Fund Source chapter](#) for more information.
- Gifts/Trinkets/Memorabilia/Commemorative Items: Trinkets (items such as hats, mugs, portfolios, t-shirts, coins, gift bags, etc., regardless of whether they include the conference name or OJP/DOJ or CVAD logo) must not be purchased with DOJ or CVAD funds as giveaways for conferences. Basic supplies that are necessary for use during the conference (e.g., folders, name tags) may be purchased.

# Other Unallowable Expenses

- Legal fees
- Cost of applying for grants
- Costs incurred prior to the grant award start date or after the grant end date
- Travel upgrades such as first class, additional leg room, or other unreasonable accommodations
- Management and administrative training
- Sole source contracts (without the prior written approval from the CVAD)
- Depreciation or a use allowance on idle or excess facilities
- Severance packages (compensation an employer provides to an employee who has been laid off, whose job has been eliminated, who through mutual agreement has decided to leave the company, or who has parted ways with the company for other reasons)
- Interest
- Credit Card Fees
- Membership fees to an organization whose primary activity is lobbying
- Bonuses (including, but not limited to employees, board members, volunteers)

# Prior Approval

Certain budget items require prior, written approval from your CVAD grant manager before adjusting the budget line-item amount(s). Your grant manager will review the requested changes and notify the subrecipient once a determination has been made. The following budget items must be pre-approved prior to being implemented by the subrecipient:

- Salary adjustments – (including grant funded staff percentages and salary changes) Significant changes to Salaries or Benefits; bonuses are never allowed.
- Overtime
- Staffing Changes – if a position is added or deleted from the budget
- Capital Purchases
- Sensitive Minor Equipment: See [Chapter XII. Property and Equipment](#) of the CVAD Administrative Grant Manual for further details.
- Furniture
- Clothing and/or Uniforms (Exception: Emergency clothing for victims/clients does not require prior approval.)
- Meeting room/audio visual services
- Indirect Cost – Funds may not be moved into or out of Indirect Cost without prior approval. The request must be accompanied by a copy of the organization's approved indirect cost rate or approved Cost Allocation Plan which includes an indirect rate. Typically, the indirect cost rate approved through the grant application process is the rate that will be honored throughout the project period (typically three years). CVAD has the discretion to decline to honor an increased rate if CVAD determines the new rate significantly diminishes the ability of the program to carry out the project service goals and objectives. An increased rate will not result in an increased CVAD award amount.

**NOTE: THIS LIST IS NOT ALL-INCLUSIVE.** For further clarification, grantees should check the specific [CVAD fund source](#) for additional allowable and unallowable costs.

Additional information regarding unallowable costs can also be found in the Department of Justice's Financial Guide in the [DOJ Grants Financial Guide – Unallowable Cost](#).

# Chapter 18 Cost Allocation

The requirements for the development and submission of indirect cost proposals and cost allocation plans are set out in [Appendices III – VII of 2 C.F.R. § 200](#). Subrecipients should follow the guidelines applicable to its type of organization.

A cost allocation plan is a means of distributing to various projects, costs which benefit more than one project and are not directly assigned.

Indirect costs are costs of an organization that are not readily assignable to a particular project but are necessary to the operation of the organization and the performance of the project. Examples of costs usually treated as indirect include those incurred for facility operation and maintenance, depreciation, and administrative salaries.

Subrecipients preparing a cost allocation plan or indirect cost rate proposal (ICRP) should review the following federal publications that are pertinent to their type of organization:

1. [2 C.F.R. § 200, Appendix III for Institutions of Higher Education](#)
2. [2 C.F.R. § 200, Appendix V for State/Local Government Central Service Cost Allocation Plans](#)
3. [2 CFR Part 200 Appendix IV-Indirect Costs Identification and Assignment and Rate Determination for Nonprofit Organizations](#)
4. [2 C.F.R. § 200, Appendix VII for State/Local/Tribal Indirect Cost Proposals](#)

# Approved Cost Allocation Plans

Subrecipients must submit a copy of their approved cost allocation plan before requesting reimbursement for allocated costs to CVAD. If a cost allocation plan for recovery of allocated costs is not submitted to CVAD within three months of the start of the award period, there is a possibility that allocated costs will be withheld from reimbursements until a cost allocation plan is received. Subrecipients who are also direct recipients of federal awards may already have a federally approved indirect cost rate. If you have negotiated an indirect cost rate with the federal government, then that rate applies.

# Cost Allocation Plans --Central Support Services

State agencies and local units of government may not charge the cost of central support services supplied by the state or local units of government to a grant, except pursuant to a cost allocation plan approved by the cognizant federal agency. The rate which is to be applied may be on a fixed, predetermined, or fixed-with-carry-forward provision.

# Cognizant Federal Agency

OMB's guidance for determining the cognizant agency is in [2 CFR Part 200, Appendix V, Section F.1](#). For local government-wide central service cost allocation plans, the cognizant agency is the federal agency with the largest dollar value of total federal awards with the local government (city or county). For state and local government departmental or agency indirect cost rates, the cognizant agency is the federal agency with the largest dollar value of direct federal awards with the state or local government department or agency.

# Cognizant State Agency

The cognizant state agency shall be responsible for approving subrecipients' cost allocation plans. Other state funding agencies, which have awarded the subrecipient with grant funds, must abide by the methods of cost allocation approved by the cognizant state agency.

The cognizant state agency is generally defined to be the state agency whose funds compose the greatest percentage of state grant funds received by a grantee agency. Determination of the cognizant state agency shall be made by CVAD. Once assigned, the term of responsibility shall be indefinite, although responsibility may be reassigned upon written request and justification to CVAD by either the cognizant state agency or the grantee agency.



# Definition of Costs

A cost allocation plan is a means of distributing expenses which benefit more than one program to various projects. Cost allocation is basically a mathematical exercise to distribute costs proportionally based on the benefit received.

An agency will incur basically three kinds of costs: direct, administrative, and allocable direct.

1. Direct costs are those costs that benefit a specific project and include expenses such as:
  - Salaries/benefits of persons who provide direct services to only one project
  - Travel costs, which benefit a program,
  - Equipment and maintenance and insurance for the equipment used only for one project
  - Project supplies for a specific project
  - Professional services which benefits a single project
  - Printing which benefits a single project
2. Administrative costs are costs that benefit the operations of the entire agency, but cannot be identified to specific projects and include:
  - Executive director's salary and benefits, or administrative portion thereof if the executive director spends time on grant-related activities
  - Fiscal officer's salary and benefits, or administrative portion thereof if the fiscal officer spends time on grant-related activities
  - Purchasing staff's salary and benefits
  - Secretarial support of administrative employees
  - General office supplies
  - Travel of administrative employees
  - Occupancy costs (e.g., rent and utilities) of administrative employees,
  - Postage and telephone costs of administrative employees
  - Liability insurance
3. Allocable direct costs are costs which benefit more than one project and are not administrative costs. These expenses include:
  - Salaries and benefits of employees whose work benefits more than one project
  - Travel costs of employees whose work benefits more than one project
  - Occupancy costs of projects
  - Communication costs of projects
  - Supplies used by more than one project
  - Contract for professional services that benefit more than one project
  - Rental and maintenance for equipment used by more than one program
  - Audit costs

# Allocation Methods

The periodic allocation of actual expenditures, rather than use of a fixed or provisional indirect cost rate, is the most appropriate and equitable method of cost allocation. Below are allowable methods to allocate administrative costs and allocable direct costs. Exceptions will be allowed, providing prior approval of the alternative method is granted from the cognizant state agency.

Administrative costs should be accumulated in a separate cost pool. After allocating the administrative cost pool its share of the allocable direct costs, the total should be periodically allocated to the projects based on the percentage of total direct program salaries. Another method is using total direct costs to distribute administrative costs. The actual administrative costs are allocated to each project based on its percentage of total direct costs for the period after allocation of direct costs.

Several different methods may be acceptable for the allocation of direct costs. The following are specific examples:

- Salaries and benefits – allocate using time and activity logs, number of clients served, or a different approved basis
- Travel – allocate on the same basis as salaries and benefits
- Occupancy costs – allocate based on the square footage occupied by the project as a percentage of total square feet allocated to all projects
- Communication costs – allocate based on the number of personnel, number of lines, or other equitable method
- Supplies – allocate based on personnel, clients served, or other equitable method
- Contracts for services – allocate based on clients served, or other equitable method
- Equipment rental and maintenance – allocated based on usage logs or other equitable method

# Instructions for Cost Allocation Plans

Subrecipients must prepare a narrative describing in detail the methods used to allocate costs to the various projects. The plan should include an organizational chart and documents and schedules to support the allocation methods.

The following should be used in the preparation of the plan:

- Effective period of the proposal
- Certificate of indirect costs
- A listing of grants and contracts by federal agency, amounts, period of performance, and the indirect cost limitations (if any) applicable to each, such as ceiling rates or amount
- Organizational chart showing the structure of the agency during the period for which the proposal applies, along with functional statement noting the duties and/or responsibilities of all units that comprise the agency
- A copy of the financial statements prepared by either a certified public accountant or state government auditor, or a copy of the official budget, if the budget reports the actual expenditures for the year on which the proposal is based, and the audit report, if applicable
- Chart of accounts

# Records

Subrecipients must have their approved formal cost allocation plan on file. The cost allocation plan must clearly indicate that line items charged to a direct cost category, i.e., supplies, are not included in the indirect cost category. All costs included in the plan must be supported by accounting records, i.e., invoices, purchase orders, canceled checks, or other records supporting payments, which show the actual expense.

# Chapter 19 Budget, Scope and Other Changes

Program and budget revisions may be considered for minor changes to what was approved in the grant application. The grantee must obtain prior written approval from CVAD for changes to scope of services or the approved budget. Program and budget revisions are not automatic. Grant scope and budget changes are not accepted within the final 30 days of the contract period.

Requests for the following must be submitted in Iowa GVS [by following these instructions.](#)

- Budget revisions - see the budget revision page in this chapter
- Scope of work changes - see the scope of work page in this chapter
- Project director changes - see the attached instructions - this will result in an amendment to the contract
- Staff changes - see the attached instructions - TBH or vacant positions need to be updated with names as soon as possible
- Match waivers - see the attached instructions - this applies to VOCA and as of 2022, VOCA match is waived

# Budget Revisions

CVAD's grants management system, Iowa GVS allows grantees to overspend budget categories by less than 10%. GVS will not allow budget category deviations greater than 10%. When attempted, the system will trigger an alert and stop the claim from being submitted.

Budget categories are payroll, benefits, in state travel, out of state travel, contractual services, utilities, advertising, etc.

All budget revisions requests must be submitted via Iowa GVS; however, if there is a claim in any status other than **paid** or **cancelled**, the system will stop the request. [Download the GVS amendment/revision instructions.](#)

When grantees request an amendment or a revision to their grants, they must initiate an amendment or revision by navigating to **Status Options** and selecting **Initiate Amendment/Revision**.

Once the grantee initiates an amendment or a revision, they will receive this message in a pop up box:

*Please complete the 'Amendment/Revision Request' form. Upon completion don't forget to submit your amendment/revision request by selecting the 'Submit Amendment/Revision' status option in the left hand navigation.*

Grantee then clicks on **Amendment Request** link in the navigation panel under **Amendments/Revisions**. If have been other amendments, another navigation panel will open and the grantee selects the one in process.

On the Amendment Request page, select budget revision.

**Budget Revision** – Grantees are directed to download the budget revision template. The budget template is an Excel document which the grantees use to request budget revisions. To make the budget revision template work, grantees must enable editing and save the file to their computer. Then they click on the editing tab, select replace and enter = into the find what and the replace with fields, choose replace all. Close the dialog box. Enter changes into the Budget Changes column and provide a justification for the changes. Justifications must include detailed information about the change.

**Cancel or Submit:** The grantee can cancel the revision request at any time. The grantee submits the request by clicking on the **Submit Amendment/Revision Request** on the navigation panel. This will forward the request to the assigned grant coordinator for review.

## Budget Revision Reminders:

- 1) **Do not submit a budget revision for the sole purpose of moving funds to client assistance. The system will allow you to overspend client assistance by more than 10%. Furthermore, you do not need your grant coordinator's permission to shift funds to client assistance.**
- 2) Do not submit a budget revision to correct or make year end adjustments unless you will be moving more than 10% from a major budget category.
- 3) Do not submit a budget revision if you are moving line item expenses within a major budget category. For example, payroll is a major budget category. Unless you are changing the payroll **total** by more than 10% you can underspend and overspend salaries as much as you want unless you overspend payroll in total by more than 10%. Here's a reminder about non direct hours: Federal funds CANNOT be used for fundraising; VOCA funds cannot be used for administration. A limited amount of STOP, FVPSA and SASP can be used

for administration. A limited amount of FVPSA dollars can be used for prevention. In general, no more than 10% of the equivalent of a full-time employee can be charged to fundraising and prevention. Most of the expenses charged to this line must be paid for with state funds. See the grant manual to review allowable expense at: <https://www.iowaattorneygeneral.gov/manual/chapter-25-cvad-fund-sources>.

3) Do not submit a budget revision to move funds from one funding source to another. For example do not submit a request to move funds from state to FVPSA, etc.

4) You can over spend a major line item by up to 10%. Do not submit a request to move less than 10% into a category.

5) If you are moving funds into major categories that can be broken down in detail, such as benefits, utilities, contracted services, etc. provide us with the details. Refer to your detailed budget from your application. For example: do not ask to move funds from benefits - tell us to move funds from FICA, insurance, etc. Likewise when moving funds into a category - tell us why and which line item.

It is likely we will cancel your budget revision request if a budget revision is not needed. If this happens, please do not re-submit your request until you talk to your grant coordinator.

If the grant coordinator needs additional information to process the request, she will follow up by either contacting the grantee or sending the request back to the grantee and requesting additional information.

Budget revision justifications must be included so it is clear why budget changes are necessary. Justifications help CVAD determine if budget revisions are appropriate and if the changes will impact the approved goals/objectives. It is possible a budget change will also require a modification to the scope of work.

Please note the budget revision request can be denied if the expense is not allowable or is unreasonable. The grantee should submit a budget revision request prior to purchasing expenses associated with the change in budget. Failure to do so may result in an expense not being reimbursed.

The budget revision request will be reviewed within 10 business days and the subrecipient will be notified regarding approval or denial.

Budget revision requests will not be accepted within the last 30 days of the grant contract period, except in extenuating circumstances as determined by the VSS Grant Administrator.

# Grant Scope Change

**Scope of Work Changes:** If it is necessary to change the approved scope of work or goals and objectives of the project, it is important to speak with your CVAD grant manager as soon as possible. Subrecipients must have prior approval before changing the scope of work.

Scope of work changes are required in order to significantly modify the programmatic goals, objectives, staffing and activities. New program narrative statements must be developed describing changes in any of the following areas:

- Target population
- Service Area
- Project goals
- Objectives
- Project activities
- Collaborative activities
- Performance measures
- Staffing
- Service Area
- Project timelines or deadlines

**How to request a scope of work change:** Prior approval means before it happens. Unfortunately, subrecipients are not always aware of changes that need to be made until the changes need to be made. It is important to review budgets, staffing, goals and objectives frequently and anticipate changes which will require a scope of work change.

Scope of work changes must be requested by submitting the request in Iowa GVS; however, it is important to talk to your CVAD grant manager prior to submitting a request. [Here are the instructions.](#)

When grantees request an amendment or a revision to their grants, they must initiate an amendment or revision by navigating to Status Options and selecting **Initiate Amendment/Revision. Claims must be in either paid or cancelled status prior to initiating a request.**

Once the grantee initiates an amendment or a revision, they will receive this message:

*Please complete the 'Amendment/Revision Request' form. Upon completion don't forget to submit your amendment/revision request by selecting the 'Submit Amendment/Revision' status option in the left hand navigation.*

Grantee clicks on **Amendment Request** in the navigation panel under Amendments/Revisions. If there are multiple amendments, another navigation panel will open and the grantee selects the one in process.

On the Amendment Request page, the grantee selects can select **one or more** of the following:

**Scope of Work** – Grantees will answer two questions: What is the Scope of Work change? This is the requested SOW, which will be different from what is in the application. And Why is the Scope of Work changing? This a justification as to why the grantee needs to change their SOW.

**Cancel or Submit:** The grantee can cancel the amendment request at any time. The grantee can submit the amendment by clicking on the **Submit Amendment/Revision Request** on the navigation panel. This will forward the request to the assigned grant manager for review. If the grant manager needs additional information she will contact the the grantee.



Scope of work requests must include a detailed justification so it is clear why the scope of work changes are necessary. Justifications help CVAD determine if the request is appropriate and if the changes will impact the approved goals/objectives. It is possible a scope of work change will require a revision of a program's goals/objectives and/or the program budget.

Please note the scope of work change request may be denied if the requested position, activities, or costs are not allowable or are unreasonable. The funded program should submit a scope of work change request and await approval, prior to hiring staff, or incurring any expenses associated with the change. Failure to do so may result in an expense not being reimbursed.

The scope of work change request will be reviewed within 10 business days and the subrecipient will be notified regarding approval or denial.

Scope of work change requests will not be accepted within the last 30 days of the grant contract period, except in extenuating circumstances as determined by the VSS Grant Administrator.

# Chapter 20 Contract Amendments

All proposed subaward or contract changes must be submitted for approval through Victim Assistance's grant management system, Grants for Victim Services, otherwise known as GVS.

All requested changes are reviewed by a grant coordinator with final approval by the grant administrator.

The following require signed amendments. For more information, please see [Chapter 19-Budget Revision and Grant Scope Requests](#)

## **Scope of Work changes:**

The subrecipient must obtain prior approval from Victim Assistance for changes in the implementation of the project which significantly changes the target population, goals, service area, or project activities .

## **Budget or Funding changes:**

Victim Assistance will amend subawards if the award amount or the funding sources change during the contract period. Budget revisions do not require contract amendments. Grantees are allowed to overspend a budget category by up to 10% without a budget revision.

## **Project Period changes:**

In general subawards are issued for one year - from October to September. If Victim Assistance determines the period of performance should be changed, the grant administrator will issue an amendment updating the effective award dates.

## **Agency Name change:**

An agency name change request must be submitted to the grant coordinator assigned to your agency along with copies of the official documentation supporting the legal action. This legal action generally involves non-profit agencies and results in approval of the Amendment to the Charter on file with the Secretary of State. Victim Assistance will review the documentation submitted and amend current subawards to reflect the legal change.

[Revised Substitute W-9](#) and ACH (Automated Clearing House) forms must also be submitted to Victim Assistance before the amendment can be processed.

# Chapter 21 Subrecipient Monitoring

Monitoring is the process used to determine subrecipients' compliance with state and federal laws and regulations, as well as the results of the goals and objectives provided in their grant applications. Each subrecipient is monitored for programmatic compliance and fiscal compliance.

The Victim Assistance grant program is guided by two primary purposes:

1. Effective stewardship of state and federal funds and;
2. Quality technical assistance for program development, fiscal management and best practices.

The monitoring plan for victim assistance grants is in compliance with the Office of Victims of Crime (OVC) requirements for State Administrative Agencies (SAA) to develop and implement monitoring plans based on a default of regular desk monitoring and biennial on-site monitoring of all subawards. Monitoring also includes Victim Assistance grant staff completing financial and programmatic risk assessments. The rule, consistent with 2 CFR §200.331 (b), (d) and (e), permits SAAs to develop and implement alternative monitoring plans and further clarifies SAAs may also implement alternative monitoring time frames as well.

The type and frequency of monitoring is based on the results of each agency's most recent risk assessment. Additional information on the risk assessment tool used to assess both financial and programmatic risk for subrecipients, may be found in the [Risk Assessment](#) section of this chapter.

# Site Monitoring

[Frequency of on-site monitoring](#)

[Pre-Site Monitoring](#)

[On-Site Monitoring](#)

[Site Monitoring Tools and Checklists](#)

[GVS Monitoring Instructions for Grantees](#)

[VSS monitoring update: Letter to all grant funded agencies](#)

[Preparing for your site visit](#)

## Site Monitoring Tools and Checklists

There are three pre-site monitoring tools:

1. [Victim services and VOCA Projects](#)
2. [Prosecution and victim witness coordinator](#)
3. [Law enforcement](#)

[List of documents to upload prior to a site visit](#)

[Policies and Procedures Guidance](#)

[Form A: Suitability Determination](#)

[Form B: Personnel and Volunteer File Certification](#)

[Form C: Expanded Personnel and Volunteer File Certification](#)

## Frequency of on-site monitoring

A full on-site programmatic and fiscal monitoring of an organization will be determined by the results of the financial risk assessment. Subrecipients designed as low or medium risk will receive at least one full financial and programmatic on-site monitoring visit every **three years, or more often as determined by the victim assistance section**. Subrecipients designated as high risk will receive at least one full financial and programmatic on-site monitoring visit every **two years, or more often as determined by the victim assistance section**. New organizations will receive at least one full financial and programmatic on-site monitoring visit **within the last two years** of the grant.

## Pre-site monitoring

Each organization will complete a **Pre-Site Monitoring Tool** prior to victim assistance conducting an on-site monitoring visit. The pre-site monitoring tool provides an update on the organization's financial and programmatic administration, as well as an update on funded projects. This will assist those conducting the site visit to determine what should be reviewed or focused on at the site monitoring visit.

To prepare for the site monitoring, the staff conducting the site visit will review the subrecipient's updated policies and procedures, relevant board of director information, the current grant application (goals and objectives), previous monitoring reports, program reports and claims.

## On-site monitoring

Staff will interview staff, review professional services contracts, review property and equipment purchased

with grant funds, review redacted client files and review financial information, including time and activity logs. Shelters will also be monitored for safety and accessibility. Staff will discuss best practices and offer assistance where needed to improve services to crime victims.

Victim assistance staff may opt to conduct a virtual site monitoring visit in lieu of an on-site monitoring visit when unforeseen circumstances require (i.e. a pandemic, low staffing levels), at their discretion. Victim assistance will notify the program and provide instructions ahead of the virtual site monitoring visit.

After the site visit, those conducting the site visits will issue an on-site monitoring report based on the on-site monitoring visit. The monitoring report will include any required corrective actions or recommendations for improvement. The monitoring report is sent to key personnel such as the executive director, board chair, police chief, sheriff or county attorney.

# Desk Reviews

## Frequency of desk reviews

CVAD financial staff will use their professional judgment and experience working with an organization to determine the frequency and intensity of additional monitoring. In general, however, organizations will have at least one financial desk review each fiscal year.

The financial desk reviews of grantees with **high financial risk designations** are the review of at least two full claims of all reimbursements and/or an in-depth review of up to 50 individual line item expenses, with all supporting documentation for each method.

The financial desk reviews of grantees with either **medium or low financial risk designations** are the review of at least one full claim reimbursement and/or an in-depth review of at least 25 individual line item expenses with supporting documentation for each method.

## Results of desk reviews

If financial mistakes are discovered during a desk review, CVAD could increase the grantee's risk designation or require the grantee to be on some kind of corrective action.

## Programmatic desk reviews

At the same time financial desk reviews are conducted, CVAD program staff will conduct programmatic desk reviews.

Programmatic desk reviews are similar to financial desk reviews in that they spot check grantees program report numbers to ensure or verify grantees report victimization data accurately. Programmatic desk reviews are completed in a similar fashion to the financial desk review.

To comply with programmatic desk reviews, grantees will provide backup documentation to support data from a recent program report. For the program report verification, grantees will be required to provide backup documentation to support data, or a number reported in one key category from a recent VOCA or CVAD biannual report.

Each quarter the data chosen to be verified will change. For example, CVAD might pull all domestic violence numbers one quarter and transportation numbers the next quarter. When it is time for your programmatic desk review, your CVAD grant manager will provide detailed information on the data to be verified along with the number of redacted files to be reviewed. It is unlikely grantees will provide 100% of their program files.

## Results of programmatic desk review

If errors are found during a programmatic desk review your grant manager will work with your agency to correct program reports and determine the cause of the discrepancy.

# Emergency Site Monitoring

CVAD may elect to conduct an emergency site monitoring visit when there is an allegation or indication any of the following may be occurring:

- Financial waste, fraud or abuse
- Client/staff mistreatment to include sexual harassment
- Violations of staff/client civil rights
- Discriminatory practices
- Unsafe conditions in a program/shelter
- Violation of state or federal certified assurances
- Other reasons at the discretion of CVAD

Depending on the allegation, CVAD may or may not provide notice to the grantee prior to coming on site for emergency monitoring. If directed, program staff and or program board members may be required to attend the emergency monitoring visit. CVAD may interview staff, clients and/or board members individually or in groups. CVAD will present the nature of the allegation either during, or upon conclusion of the emergency site visit. CVAD will follow up with a summary report including any corrective action(s) to be taken by the grantee. This report will be provided to the board chair and executive director of the agency.

# Risk Level Tool & Assessment

[Financial Risk Designation](#)

[Programmatic Risk Designation](#)

[Appeal Process](#)

The CVAD risk assessment tool assesses both financial and programmatic risk for CVAD subrecipients. The results from the risk assessment dictates appropriate financial and programmatic monitoring for each agency and/or funded project.

At the beginning of each grant cycle, CVAD financial staff will complete a financial risk assessment for each CVAD funded *organization* and CVAD grant managers will complete a programmatic risk assessment for each CVAD funded *program/project*. CVAD uses a wide array of monitoring activities to ensure fiscal and programmatic integrity of grant funds.

Agencies will be notified of their risk designation. If an agency does not agree with CVAD's risk assessment designations, there is an appeal process. For more information, please refer to the appeal process section of this chapter.

## Financial Risk Designations

An agency's financial risk designation will stay in place for the entire 3-year grant cycle. For consistency, when CVAD assigns the financial risk designation to victim service agencies, the claim submission rules apply to ALL of that victim service agency's CVAD funded programs/projects. CVAD reserves the right to raise any risk designation should new information be discovered; however, the risk designation will not be lowered during the 3-year grant cycle.

The following are some of the factors considered when assessing financial risk:

1. Total award amount
2. Percentage of CVAD funding for organization budget
3. Percentage of award reversions
4. Timely submission of invoices
5. Previous grant award experience
6. Claim errors/issues
7. Requests for advancements or expedited claims
8. Financial competency
9. Audit findings
10. Fiscal staff turnover
11. Prior debarment or high risk status

Each question in the CVAD Risk Assessment Tool is worth a certain number of points. Based on the total points scored, the agency is designated as either high risk, medium risk or low risk. The higher the score, the higher the assumed financial risk.

## Risk Designation and Resulting Monitoring

High risk designation and resulting monitoring:

1. Organization is required to provide 100% supporting documentation for the following expenses with every monthly/quarterly claim reimbursement:
  - a. Payroll
  - b. Benefits
  - c. Client assistance expenses
  - d. Sensitive Minor Equipment with an individual cost greater than \$500 (equipment includes



computers, laptops, tablets, cell phones, copiers, etc.).  
e. Match

2. CVAD financial staff will use their professional judgment and experience working with an organization to determine the frequency and intensity of additional monitoring. In general, however, organizations will have at least one financial desk review each fiscal year to review at least two full claims of all reimbursements and/or an in-depth review of up to 50 individual line item expenses, with all supporting documentation for each method. **Exception:** CVAD does not need to review any documentation they already reviewed in #1 above.

#### Medium risk designation and resulting monitoring:

1. Organization is required to provide 100% supporting documentation for the following expenses with every monthly/quarterly claim reimbursement:
  - a. Payroll
  - b. Client assistance expenses
  - c. Match
2. CVAD financial staff will use their professional judgment and experience working with an organization to determine the frequency and intensity of additional monitoring. In general, however, organizations will receive a minimum of one financial desk review each fiscal to review at least one full claim reimbursement and/or an in-depth review of at least 25 individual line item expenses with supporting documentation for each method. **Exception:** CVAD does not need to review any documentation they already reviewed in #1 above.

#### Low risk designation and resulting monitoring:

1. Organization is required to provide 100% supporting documentation for the following expenses with every monthly/quarterly claim reimbursement:
  - a. Client assistance expenses
2. CVAD financial staff will use their professional judgment and experience working with an organization to determine the frequency and intensity of additional monitoring. In general, however, organizations will receive a minimum of one financial desk review each fiscal year to review at least one full claim reimbursement or an in-depth review of at least 25 individual line item expenses with supporting documentation for each method . **Exception:** CVAD financial can exclude client assistance since client assistance has already been reviewed.

When reviewing claims, CVAD will use their professional judgment to determine if additional documentation is needed for a particular claim, for example, large expenditures, equipment, out of the norm travel costs, or unusual match.

#### Note for supporting documentation:

Upload budget allocation by fund source and expense type if the supporting documentation cannot be tracked in the original budget. Payroll summary is mandatory if payroll documentation is required by the associated risk assessment designation.

## **Programmatic Risk Designations**

An agency's programmatic risk designation will stay in place for the entire 3-year grant cycle. CVAD reserves the right to raise any risk designation should new information be discovered; however, the risk designation will not be lowered.

Programmatic risk assessment scores determine if programs within agencies are considered high, medium or low programmatic risk. Grant funded projects are evaluated based on programmatic risk assessment questions in the CVAD Risk Assessment Tool. CVAD staff assess points for each question. Based on the total points scored each agency is designated as high risk, medium risk or low risk. Some of the risk factors considered when assessing risk are:

1. Administrative capacity
2. Programmatic goals
3. Reduction in clients served
4. Quality of service
5. Other programmatic concerns

## **Risk Designation and Resulting Monitoring**

### Program high risk designation:

1. Conduct on-site annual technical assistance meeting with the program.
2. Develop a service plan that addresses deficiencies pertaining to the award/contract that is identified through the risk assessment tool and technical assistance visit.

### Program medium risk designation:

1. Conduct technical assistance meeting with the program within the first two years of the contract. CVAD grant managers will use professional judgment and experience working with the subrecipient to determine if the technical assistance be provided on-site or virtually (email, telephone, skype, etc.)
2. A service plan will be developed, if warranted, from the results of technical assistance and risk assessment.

### Program low risk designation:

1. CVAD grant managers will use discretion if technical assistance or on-site visit is warranted.

## **Appeal Process**

Subrecipients have the right to appeal their risk assessment decision. To file an appeal, the organization's authorized official must send an email to the [VSS Administrator](#) stating he/she wishes to appeal the risk assessment decision and detail the reasons for the appeal as well as provide additional documentation to substantiate his or her reasons to appeal. Subrecipients must appeal within 7 days of receipt of notice of risk assessment designation. The VSS Administrator, in conjunction with the CVAD Director will accept, reject or negotiate the appeal and will respond to the appeal within 7 working days.

If the appeal is accepted, CVAD will complete a new risk assessment and offer a revised risk assessment designation and subsequent monitoring plan. If the appeal is rejected, CVAD will notify the organization and will work with the organization to address its concerns as outlined in the appeal. If the appeal is negotiated, CVAD and the organization will work together to potentially change some issues outlined in the appeal, while holding firm, other issues and concerns from the subrecipient. If appropriate, the risk assessment designation will change.

Each risk assessment decision and each appeal are to be considered on a case-by-case basis, while maintaining integrity and fairness throughout the process. The determination of the CVAD Director or VSS Administrator will be final step in the appeals process.

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# New Programs and Non VOCA Projects

When new organizations are funded, they will be monitored as follows:

1. 100% financial documentation for the first 6 months, with discretion to extend from quarter to quarter.
2. If there are issues during the first 6 months, the organization will be considered high risk for the remainder of the contract period for documentation purposes and submit required documentation based on this risk level. The financial risk assessment will be completed in year 2, or at the end of the first six months.
3. A programmatic risk assessment will be conducted after the first year of the grant.
4. A minimum of one in-person program technical assistance/orientation visit within the first year.
5. A minimum of one on-site monitoring visit within the last two years of the grant.

Regardless of the assigned risk designation, either financial or programmatic, CVAD will use their professional judgment on a case-by-case basis to determine if additional supporting documentation, on-site monitoring or technical assistance is needed. This may include requesting additional documentation for a particular claim.

## **Non VOCA Projects**

Projects that are not VOCA funded and are not required to have a risk assessment completed as determined by federal and state funding guidelines, will have an on-site monitoring visit conducted every three years.

Law Enforcement and Prosecution funded organizations provide 100% supporting documentation for all claims and therefore do not receive a financial risk assessment.

# Corrective Actions

[On-Site Monitoring Corrective Actions](#)

[Financial Corrective Actions](#)

[Programmatic Corrective Actions](#)

[Other Corrective Actions](#)

## On-Site Monitoring Corrective Actions

Within 60 days of the on-site monitoring visit, the CVAD staff who conducted the on-site monitoring visit will issue a report outlining any corrective action(s) including any requirements or recommendations. This letter will be sent to the agency's key personnel. If the agency is a non-profit, the letter will also be sent to the chair/president of the nonprofit-agency's board.

The letter will also be uploaded into the grants management system and the agency will be required to fill out a [site monitoring corrective action tracking form](#) to provide required updates to the corrective action plan (CAP). CVAD will monitor the agency's compliance with the CAP.

## Financial Corrective Action

If CVAD has documented financial concerns about a subrecipient, CVAD will determine if:

1. Financial risk assessment designation needs to be changed;
2. CVAD financial staff needs to conduct an immediate desk review;
3. CVAD financial staff needs to conduct an immediate on-site monitoring visit.

If an organization is placed on financial corrective action regarding claim submissions, they will be required to submit 100% documentation for three months. After the end of three months, CVAD finance and the grant managers will determine if the corrective action status is released in full, released with conditions or extended.

Financial corrective action and probationary status impacts the entire organization, therefore, all CVAD grant projects within an organization are affected.

## Programmatic Corrective Action

If CVAD has documented programmatic concerns about an organization or a program within an organization, the CVAD grant manager will determine if:

1. CVAD's programmatic risk assessment designation needs to be changed;
2. The problem/problems warrant a formal corrective action plan;
3. CVAD needs to provide additional technical assistance;
4. CVAD staff need to conduct an immediate on-site visit.
5. CVAD will either release or extend the subrecipient from corrective action as appropriate.

## Other Corrective Actions

An event or series of events, could substantiate a review of the financial or programmatic risk assessment and, or the monitoring of an organization or project. This review may result in the changing of the risk designation for the remainder of the grant cycle, the implementation of a probationary period, a written corrective action plan or other actions deemed appropriate, based on the findings of the review.

Examples of events which warrant a review of the risk assessment, or monitoring are: audit findings, significant and continual errors on CVAD claims, findings from CVAD on-site monitoring or financial desk

reviews, programmatic concerns stemming from complaints from other organizations or from program participants or from the results of program reports submitted to CVAD.

Once CVAD is aware of a potentially adverse situation, a grant manager will do the following:

1. Review and document the situation;
2. Consult with CVAD financial staff regarding potential financial issues, if necessary;
3. Determine if a new risk assessment level or corrective action plan is needed;
4. Notify appropriate organization/programs.

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## Chapter 22 Retention of and Access to Records

In accordance with the requirements set forth in [28 CFR Part 66](#) for state and local governments and [Part 70](#) for Non-Profit organizations, all financial records, supporting documents, statistical records, and all other records pertinent to the award shall be retained by each subrecipient organization for **AT LEAST THREE YEARS** following the closure of their most recent audit report. Retention is required for purposes of Federal and State examination and audit. Records may be retained in an automated format. Reference [2 CFR 200.333](#).

State or local governments may impose record retention and maintenance requirements in addition to those prescribed in this chapter, so each agency should seek additional guidance from an independent auditor prior to destruction of records.

All client records must be maintained in a secure location to restrict the release or viewing of confidential, personally identifying information.

# Record Retention

Project files, including all pertinent programmatic and financial documents relating to the project, shall be retained by each agency for at least three (3) years after the date of submission of the final fiscal and program reports. Some documents should be kept permanently. An agency/program should seek the guidance of an independent auditor to determine this.

The following are exceptions to the standard record retention period:

- If any litigation, claim, audit, or other action involving the records has started before the expiration of the 3-year period, the records must be retained until all issues involving the records have been resolved and final action taken.
- When notified by the Attorney General's Office, the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
- Records for real property and equipment acquired with Federal funds must be retained for 3 years after the final disposition.
- When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the 3-year retention period requirement is not applicable to the non-Federal entity.
- When required for program income earned after the period of performance, the retention period starts from the end of the non-Federal entity's fiscal year in which the program income is earned.
- Indirect cost proposals submitted for negotiation must be retained for 3 years from the date of submission.
- Indirect cost proposals not required to be submitted for negotiation must be maintained for 3 years from the end of the fiscal year covered by the proposal.

# Access to Records

The awarding agency which includes CVAD, the Department of Justice, Office for Victims of Crime, Office on Violence Against Women, Department of Health and Human Services, Office of the Inspector General, Office of Justice Programs - Office of the Chief Financial Officer, or any of their authorized representatives, shall have the right of access to any pertinent books, documents, papers, financials or other records of Grantee which are pertinent to the award, in order to make audits, examinations, excerpts, and transcripts. Any access to client files should be provided with redacted personally identifying information.



## Chapter 23 Sanctions and Termination of Funding

The Crime Victim Assistance Division has full discretion to take action if a subrecipient fails to comply with the terms and conditions of a contract, including civil rights requirements, whether stated in a State or Federal statute, regulation, assurance, application, or notice of award.

# Sanctions

If a subrecipient fails to comply with the terms and conditions of a contract, Victim Assistance Section staff may take one or more of the following actions, as appropriate in the circumstances.

1. Place the program on a corrective action plan to remedy the issue.
2. Temporarily withhold cash payments pending correction of the deficiency by the subrecipient.
3. Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.
4. Require immediate reimbursement for any payment made on an ineligible expense.
5. Wholly or partially suspend or terminate the current contract.
6. Withhold further contracts for the project or program.
7. Place the program on probationary status.
8. Take other remedies that may be legally available.

# Corrective Action

A subrecipient may be put on corrective action if it has exhibited poor financial or programmatic behavior for one or more of the following reasons.

- a. It demonstrates unsatisfactory administrative capacity. Examples include but are not limited to:
  - Consistent high turnover of executive staff;
  - Consistent delinquent program claims, reports and/or contracts;
  - Missing client files;
  - Failure to address issues identified at a site monitoring visit;
  - Findings of discrimination; and/or
  - Exhibits poor board governance that affects service delivery, etc.
- b. It is not financially competent/stable. Examples include but are not limited to:
  - Unresolved audit findings;
  - Significant and continuous claim errors;
  - Financial concerns after on-site monitoring or a desk review; or
  - Other issues concerning financial grant management.
- c. It is not/has not met the goals and deliverables outlined in grant contract.

After repeated efforts to assist an organization to improve performance with little to no progress, Staff will consult and recommend to the VSS Administrator that an organization be placed on corrective action. Staff will outline factors to be incorporated in a corrective action plan and a desired timeline for completion, and/or they will direct the program to create a corrective action plan with a desired timeline and deadline to submit it to Victim Assistance Section for approval.

# Termination of a Contract

[Notice of Default](#)

[Program Remedies](#)

[Set Off](#)

[Program Duties Upon Termination](#)

[Indemnification](#)

[Administrative Rule 61-9.62(13)(1-3)]

Contracts may be terminated for the following reasons:

**Termination on notice by the Department (CVAD).** Following written notice, the Department may terminate this contract for convenience without the payment of any penalty or incurring any further obligation to the non-terminating party. Following termination upon notice, the Department will pay the Program upon submission of any outstanding performance reports, any active files and/or work product, or anything outlined in the closeout letter issued by the Department. The Program will also need to submit the disposition of any capitalized equipment, invoices and proper proof of claim, for services provided under this contract up to and including the date of termination, minus any funds owed the Department

**Termination for cause by the Department.** The Department may declare the Program to be in default of its obligations under this contract when any of the following events occurs:

1. The Program fails to observe and perform any covenant, condition or obligation created by the contract;
2. The Program fails to make substantial and timely progress toward performance of the contract; or
3. The Program's work product and services fail to conform with the requirements of this contract.

**Termination by the Department due to lack of funds or change in law.** Despite anything in this contract to the contrary, and subject to the limitations, conditions, and procedures set forth below, the Department may terminate this contract without penalty by giving written notice to the Program if any of the following occurs:

1. The legislature or governor fails to appropriate funds sufficient to allow the Department to operate as required and to fulfill its obligations under this contract;
2. If funds are de-appropriated or not allocated;
3. If the federal government reduces or eliminates the federal grant;
4. If the Department's authorization to operate is withdrawn or there a material alteration in the programs administered by the Department; or
5. If the Department's duties are substantially modified.

**Termination on notice by the Program (Subrecipient).** Following written notice, the Program may terminate this contract for convenience without the payment of any penalty or incurring any further obligation to the non-terminating party. Following termination upon notice, the Department will pay the Program upon submission of any outstanding performance reports, any active files and/or work product, or anything outlined in the closeout letter issued by the Department. The Program will also need to submit the disposition of any capitalized equipment, invoices and proper proof of claim, for services provided under this contract up to and including the date of termination, minus any funds owed the Department

## Notice of default

If there is a default event that the Program can cure, the Department must provide written notice to the Program requesting that the breach or noncompliance be immediately remedied. If the breach or noncompliance continues 10 days beyond the date of the written notice, the Department may immediately terminate the contract without additional written notice or enforce the terms and conditions of the contract and seek any legal or equitable remedies. In either event, the Department may seek damages due to the breach or failure to comply with the terms of the contract.

## **Program Remedies**

If the Department terminates this contract due to convenience, cause, lack of funds or change in law as provided above, the Program's exclusive, sole, and complete remedy is the payment for services completed prior to and including the date of termination.

## **Set Off**

Should the Department obtain a money judgment against the Program because of a default under this contract, the Program consents to such judgment being set off from moneys owed the Program by the State of Iowa or any other agency of the State of Iowa under any other contract.

## **Program Duties Upon Termination**

When the Program receives the Department's notice of termination for any reason allowed under this contract, the Program must cease all work under this contract except any work the Department directs the Program to perform. The Program must also comply with the Department's instructions for the timely transfer of any active files and related work product. [Administrative Rule 61—9.63(13)]

## **Indemnification**

The Program agrees to indemnify and hold the State of Iowa, the Department, and the Attorney General's Office harmless from any or all liabilities including, but not limited to:

1. Program's performance or non-performance of a contract entered into, or violation of these local, state and federal rules, laws and regulations; or
2. Program's activities with subcontractors and all other third parties, or any other act or omission by a Program, its agents, officers, and employees [Administrative Rule 61—9.63(13)]; or
3. Any Violation of this Agreement by the Program; or
4. Any negligent acts or omissions of the Program.

# Chapter 24 Civil Rights/Complaint Process

This chapter contains information regarding how someone can file a complaint with the Victim Assistance Section of the Attorney General's Office, the types of complaints appropriate to report and the processes for investigating complaints.

A complaint may involve:

- a. Discrimination
- b. Violation of Service Standards
- c. Civil Rights violations
- d. Violations of contract terms, or certified assurances

**The Office for Civil Rights** also requires grantees to submit **EEOP certification forms** to the Office for Civil Rights. Grantees might also be required to create and submit a utilization report. For more information on EEOP requirements specific to your organization and to access the reporting tool, go to the [Civil Rights EEOP website](#).

# Service Standards Online Complaint Form

# Discrimination Online Complaint Form



# Civil Rights Complaint Process

## Complaint Process

All clients, customers, program participants, employees, job applicants, or consumers of The Iowa Attorney General's Office, and those of their subrecipients have the right to participate in programs and activities operated by the Victim Assistance Section or its subrecipients regardless of race, color, religion, national origin, sex, age, disability. In addition, subrecipients of Violence Against Women Act (VAWA) grants are prohibited from discriminating on the basis of sexual orientation or gender identity or expression.

Anyone who thinks they have been discriminated against by an employee of The Iowa Attorney General's Office or a subrecipient of The Iowa Attorney General's Office, on the basis of race, color, religion, national origin, sex, age, disability, or thinks they have been retaliated against by an Iowa Attorney General employee or subrecipient, may file a written complaint alleging such discrimination by completing the [Discrimination Complaint form](#). In addition, recipients or subrecipients of Violence Against Women Act (VAWA) funds are prohibited from discriminating on the basis of sexual orientation or gender identity or expression.

The completed form must be mailed to:

Office of the Attorney General of Iowa  
Victim Assistance Section  
Lucas State Office Building  
321 East 12th Street  
Des Moines, IA 50319

## Complaint Process

Any employee of the Victim Assistance Section of the Iowa Attorney General's Office who receives a discrimination complaint from an employee, a job applicant, client, customer, program participant or consumer of the Victim Assistance Section or of a subrecipient, must forward the completed complaint form to the Victim Assistance Section Chief.

The Victim Assistance Section Chief shall provide direction to the Victim Assistance staff regarding the next steps to take regarding the complaint.

Complainants will also be informed that they may file complaints directly with:

### U.S. Department of Justice

Office of Justice Programs  
Office for Civil Rights (OCR)  
810 7th Street NW  
Washington, DC 20531

In the event that a Federal or State court or Federal or State administrative agency makes a finding of discrimination after a due process hearing on the ground of race, religion, national origin, sex, or disability against a recipient of victim assistance formula funds The Iowa Attorney General's Office will forward a copy of the findings to the Office for Civil Rights of OJP.

## Online Reporting Tool to Report Civil Rights Violations

The new Civil Rights Reporting Portal – located at [civilrights.justice.gov](http://civilrights.justice.gov) – will consolidate over 30 unique reporting pathways. The portal will dramatically ease the burden on victims of civil rights violations to identify the proper reporting channel. The form is fully accessible to people with disabilities. It is also available in both English and Spanish, with more languages to be added over the next year.

Individuals who believe that they may have been victims of civil rights violations can learn how to report violations by visiting [civilrights.justice.gov](https://civilrights.justice.gov).

If you believe that you are a victim of criminal civil rights violations, such as misconduct by law enforcement officers, hate crimes, or human trafficking, please [contact your local FBI office](#).

# Violation of Victim Service Standards, Contractual Stipulations and/or Certified Assurances

## [Complaint Process](#)

All clients, employees, or consumers of an Iowa Attorney General's subrecipient may file a complaint regarding a potential violation of a victim service program's service standards, contractual stipulation and/or certified assurances by completing the [Service Standards Complaint form](#) and sending it to:

Office of the Attorney General of Iowa  
Victim Assistance Section  
Lucas State Office Building  
321 East 12th Street  
Des Moines, IA 50319

## Complaint Process

Within one week of receiving a written complaint, the grant coordinator assigned to the victim service program with whom the complaint is about, will notify the complainant and individual or organizations noted in the complaint, and provide them with:

1. A copy of the complaint
2. A copy of the process that will be followed
3. The Victim Assistance contact person's name (each party will have one contact person assigned to them)

Staff will also forward a copy of the complaint to the Victim Assistance Section Chief.

The grant coordinator will contact the complainant, obtain additional information if needed, and forward a blank release of information form. The grant coordinator will also contact the organization named in the complaint. The grant coordinator will obtain releases signed by the complainant in order to obtain case notes, emails, text messages or any other documentation from the organization necessary to investigate the complaint.

Once the investigation has been completed, a Victim Assistance review team (generally the grant coordinator, grant administrator and the Section Chief) will determine if the complaint is a violation of the victim service program service standards, contractual agreement and/or certified assurances. If a complaint does not concern a violation of victim service program standards, contractual agreement and/or certified assurance, the review committee will refer the complaint back to the victim service program or complainant to resolve.

If review team determines the complaint is alleging a violation of service standards, contractual agreement and/or certified assurances, it will gather additional information, the review team may request information from any party to the complaint including the complainant; the person(s) or organization being complained about; the board of the victim service program involved; or any other person or organization with knowledge about the circumstances of the complaint. All attempts will be made to gather this information within 60 days of receipt of the complaint.

If, during the information-gathering phase, one party requests the opportunity to address the review team in person and it is granted, all parties will be offered the chance to talk with the committee individually.

After the information is gathered, the review team will formulate the results of their review, including suggested recommendations to the victim service program if it was determined there was a violation of the program service standards, contractual agreement and/or certified assurance.

If there was no finding, this will be communicated to both the complainant and the individual or organization the complaint was about.

If there was a finding, both the complainant and the individual, and/or organization the complaint was about will be notified. In addition, the individual/organization will receive a corrective action plan which will include what the organization needs to do to remedy the violation (e.g. changes to policy/practice, training, etc.) and the time frame to complete the corrective action.

The grant coordinator monitor the individual/organization for compliance with the corrective action plan and report back to the grant administrator and the Section Chief. If the individual/organization does not comply, the Section Chief will determine the next steps, which could include a sanction or grant termination.

All information gathered in the complaint process will be kept confidential (with the exception of notifying the complainant of the outcome of the review team's determination of a finding/no finding). If a sanction is imposed, the content of the sanction will be made available to the public.

\*If a complaint is tied to the direct harm of survivors, the Iowa Attorney General's Office may take immediate corrective action. Examples of direct harm include (but are not limited to):

- Violation of client confidentiality
- Denial of services based on race, ethnicity, national origin, gender identity, sexual orientation, age, ability or religion. (Refer to [Discrimination Complaint Process](#))
- Denial of services based on mental illness or substance abuse that does not present immediate risk of harm to a survivor or staff or volunteer member

# Chapter 25 CVAD Fund Sources

This chapter contains information related to the specific federal and state fund sources for grants made available through Victim Assistance.

**All grant subrecipients, regardless of the fund source, must follow the general requirements in Chapters 1 to 24.**

# Family Violence Prevention Services Act (FVPSA)

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[Family Violence Prevention and Services Act funds \(FVPSA\)](#) support programs that prevent incidents of family violence, domestic violence and dating violence. FVPSA Programs provide immediate shelter, supportive services and access to community-based programs for victims of family violence, domestic violence, or dating violence as well as for their dependents. States must provide specialized services to underserved populations and victims who are members of racial and ethnic minority populations. Special emphasis is given to the support of community-based projects with demonstrated effectiveness.

Shelter Programs must provide the following nine (9) core components:

- Safe confidential shelter
- 24-hour crisis-line
- Counseling
- Advocacy
- Transportation
- Community education
- Referral
- Follow-up
- Specialized services to children and to underserved populations

See [FVPSA Legislative Authority](#)

See Family Violence and Prevention Services [Certified Assurances](#)

## Eligibility

Agencies must be operated by a public or nonprofit agency, or a combination of such agencies. FVPSA funds are granted to programs to increase public awareness about domestic violence and its impact on families and support programs for the prevention of family violence, provide immediate shelter and related assistance to victims of family violence and their dependents, and provide training and technical assistance to family violence personnel in states, local public agencies (including law enforcement agencies, courts, social service agencies, and health care professionals), and non-profit private organizations.

These programs include, but are not limited to:

- domestic abuse programs
- domestic abuse shelters
- other community-based victim coalitions.

**Confidential Location** Federal guidelines require that the address or location of the shelter will not be made public except with written authorization of the person(s) responsible for operation of the shelter.

## Purpose

The purpose of FVPSA Programs is:

1. to assist nonprofit organizations, local public agencies, approved partnerships, and faith-based organizations in supporting the establishment, maintenance, and expansion of programs and projects to prevent incidents of family violence, domestic violence, and dating violence;
2. to provide immediate shelter, supportive services, and access to community-based programs for adult and youth victims of family violence, domestic violence, or dating violence, and their dependents; and
3. to 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.

## Family Violence and Protection Act Definitions

The following definitions are from the Family Violence and Prevention Act, P.L. 98-457, 42 USC 10401 sec. 309, as amended in 1992 by P.L. 102-295, and as amended in 1994 by P.L. 103-322 and as outlined in the [FVPSA Final Rule](#) that became effective January 3, 2017.

**Dating violence** means 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** means 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** means 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.

**Personally identifying information (PII)** or personal information is 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** means 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, for the term only as it appears in the definition of State Domestic Violence Coalition, means 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 is 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, and may include, but are 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** means 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 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** means 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** means 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.

**Underserved populations** means populations who face barriers in accessing and using victim services, and includes populations underserved because of geographic location, religion, sexual orientation, gender identity, underserved racial and ethnic populations, and populations underserved because of 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 American; 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.

## Allowable Services-Related Assistance

Related Assistance is the provision of direct assistance to victims of family violence and their dependents for the purpose of preventing further violence, helping such victims to gain access to civil and criminal court and other community services, facilitating the efforts of such victims to make decisions concerning their lives in the interest of safety, and assisting such victims in healing from effects of the violence.

Allowable Services, Activities, and Costs:

- 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
- 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
- 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
- Provision of culturally and linguistically appropriate services
- 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
- 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; This attachment provides more detail on medical advocacy. This attachment provides information on reimbursable health care services.

4. Assistance locating and securing safe and affordable permanent housing and homelessness prevention services;
5. Transportation, child care, respite care, job training and employment services, financial literacy services and education, financial planning, and related economic empowerment services;
6. Parenting and other educational services for victims and their dependents; and
7. Provision of prevention services, including outreach to underserved populations

See also [Chapter XVI. Allowable Costs](#)

## Unallowable Services/Costs

Direct monetary funds given to the client (cash, gift cards or checks written to the client). However, providing specific assistance to individuals that may include making payments on behalf of shelter residents for needed emergency items while they are in shelter, is allowable. If a client moves from the shelter into an apartment or house, but later requests direct assistance with rent, utilities or other expenses, FVPSA funds may not be used for this purpose. However, providing specific assistance to individuals who are in the process of moving out of the shelter facility, including the payment of rent, utilities or other expenses on behalf of the shelter resident, is allowable.

FVPSA funds may not be used for fundraising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions.

FVPSA funds may not be used to pay for food and beverages with the exception of food and beverages used within the shelter and for shelter residents.

See also [Chapter XVII. Unallowable Costs](#)

## Reporting Requirements

The grant project director is responsible for timely submission of completed program and fiscal reports. Please see [Chapter IX. Reporting Requirements](#) for specific information.

**NOTE:** The subrecipient is required to gather and maintain statistical data relating to grant project activities as required by CVAD. During desk audits, on-site monitoring and any other time at CVAD's discretion, CVAD may request to see the back-up data that supports the information submitted on your reports.

## Match Requirements

Match is required for all agencies, except victim service providers and tribal government organizations. For an agency to qualify under this exclusion, the recipient must be an organization that is recognized by the Internal Revenue Service (IRS) as a tax-exempt organization described in section 501(c)(3) of Title 26 of the United States Code (unless it is a tribal governmental organization or a governmental rape crisis center in a State other than a Territory).

The following provisions apply to match requirements:

1. Subgrantees may satisfy the match requirement with either cash (e.g., funds contributed from private sources or state and local governments) or in-kind services (e.g., services or goods donated by the applicant organization or other entities).
2. Funds from other federal sources may not be used to meet the match requirement.
3. Funds or in-kind resources used as match must be directly related to the project goals and objectives.
4. Subgrantees must maintain records which clearly show the source, the amount, and the timing of all matching contributions.
5. Sources of match are restricted to the same requirements as federal grant sources allocated to the

project and must be documented in the same manner as federal sources, including financial and programmatic reports.

Match Calculation:

In order to calculate the FVPSA match, multiply the award amount by 25%. As stated above, match must be from non-federal sources based on the FVPSA award amount. Non-profit, nongovernmental victim services programs are not required to make match. For example, if grant funds total \$100,000, your agency must provide \$25,000 in match (100,000 multiplied by 25% = \$25,000)

## **Contract Period**

Subrecipient contracts will be issued annually for every year of the three-year application period.

The majority of the contracts are issued for a 12-month period beginning October 1, and ending September 30 of the following year. The contract will include the amount of funds awarded for that year. During a multi-year award cycle, a contract is issued annually.

Each grantee must be in compliance with state and federal rules and in good standing with the Victim Services Support Program (VSS) requirements and procedures to receive funding in the second and third years of the cycle. The amount available to designated programs in the second and third year of the cycle will be based on the State and Federal funds available.

For more information on CVAD contracts with subrecipients, please see [Chapter II. Post-Award Requirements, CVAD Contracts](#).

## **Non-Supplanting**

Federal funds must be used to supplement existing funds for program activities and not replace those funds, which have been appropriated for the same purpose. Potential supplanting will be the subject of application review, as well as pre-award review, post-award monitoring, and audit. If there is a potential presence of supplanting, the grant recipient will be required to supply documentation demonstrating the reduction in non-Federal resources occurred for reasons other than the receipt or expected receipt of Federal funds.

For more information on non-supplantation and grant requirements, see [Chapter III. Financial Requirements, Grant Accountability Requirements](#).

# Sexual Assault Services Program (SASP)

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The [Sexual Abuse Services Program funds \(SASP or SS\)](#) was created by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA 2005), 42 U.S.C. §14043g, and is the first Federal funding stream solely dedicated to the provision of direct intervention and related assistance for victims of sexual assault. Overall, the purpose of SASP is to provide intervention, advocacy, accompaniment (e.g., accompanying victims to court, medical facilities, police departments, etc.), support services, and related assistance for adult, youth, and child victims of sexual assault, family and household members of victims and those collaterally affected by the sexual assault.

SASP subrecipients must adhere to all requirements in the [DOJ Grants Financial Guide](#) and the [OMB Uniform Guidance](#).

[Sexual Assault Services Program certified assurances](#)

## Eligibility

Sexual abuse programs and rape crisis centers are eligible in Iowa as long as they are considered a non-profit, nongovernmental organization.

## Purpose

Purpose of the SASP Funds is to provide direct services to sexual assault victims: The following information is taken from OVW FY2009 Sexual Assault Services Formula Grant Program Application Kit, Office on Violence Against Women, U.S. Department of Justice.

“The program must demonstrate a record of providing effective services to sexual assault victims. The overall purpose of the SASP funds are to provide intervention, advocacy, accompaniment (e.g., accompanying victims to court, medical facilities, hospitals, police departments, etc.), support services, and related assistance to:

- Adult, youth, and child victims of sexual assault;
- Family and household members of such victims; and
- Those collaterally affected by the victimization, except for the perpetrator of such victimization (e.g., friends, co-workers, classmates).”

## Allowable Services Include

- 24-hour hotline services providing crisis intervention services and referral;
- Accompaniment and advocacy through medical, criminal justice, and social support systems, including medical facilities, police, and court proceedings;
- Crisis intervention, short-term individual and group support services, and comprehensive service coordination and supervision to assist sexual assault victims and family or household members;
- Information and referral to assist the sexual assault victim and non-offending family or household

- members, including outreach activities;
- Community-based, linguistically and culturally specific services and support mechanisms, including outreach activities for underserved communities; and
- The development and distribution of materials on issues related to the services described in the previous bullets. For example, a program could use pamphlets, brochures, or community presentations to announce the services available under the grant.

Other Allowable uses of SASP funds include:

- SASP funds may be used to support projects that focus on direct services for children who are victims of sexual assault. Services rendered to children do not have to be in connection to serving an adult parent and there is no age restriction on providing services to children.
- SASP funds may be used to support a hotline to the extent the hotline is for sexual assault victims. If the hotline covers a broader array of issues, the costs should be pro-rated according to the percentage of calls that are for sexual assault. In order for a multi-issue hotline to receive SASP funds, the people who answer the hotline would need to have sexual assault specific training. See [Chapter VI. Victim Advocate Certification and Training Requirements](#) for more information on required training.

SASP funds may be used to support volunteer related expenses as they relate to the SASP project. Examples would include training and supervision of volunteers.

SASP funds may be used to train advocates (volunteer or employee) that will provide specific grant-funded services. Note: funds may not be used to provide a generalized statewide training nor may funds be used to develop training curriculum.

Gift cards to clients are only allowable to the extent that they are used for allowable costs under SASP such as the purchase of emergency food for SASP clients or gas for victims to attend court, appointments etc. related to the victimization. However, agencies must acquire a receipt from the client which documents only allowable items (food or gas-in the example) were purchased. Without copies of these receipts, these costs will be deemed unallowable by OCJP and repayment of these funds will be required.

Applicants are encouraged to allocate grant funds to support activities that help to ensure individuals with disabilities and Deaf individuals and persons with limited English proficiency have meaningful and full access to their programs. For example, grant funds can be used to support American Sign Language (ASL) interpreter services, language interpretation and translation services, or the purchase of adaptive equipment. Applicants proposing to use grant funds to create websites, videos and other materials must ensure that they are accessible to persons with disabilities and grant funds must be allocated for these purposes. See also [Chapter XVI. Allowable Costs](#)

## Unallowable Costs

- SASP grant funds may not be used for education programs or training for allied professionals or the general public.
- SASP funds may not be used for activities focused on prevention efforts (e.g. bystander intervention, social norm campaigns, presentations on healthy relationships, etc.). However, funds may be used for outreach to inform persons about the services provided by a specific program. For example, a program could use pamphlets, brochures, or community presentations to announce the services available under the grant.
- SASP funding may not be used for lobbying.
- SASP funding may not be used for research projects.
- SASP funding may not be used for physical modifications to buildings, including minor renovations and vehicle purchases.
- SASP funds may not be used for Sexual Assault Forensic Examiner (SANE) projects.
- SASP funds may not be used for criminal justice-related projects including law enforcement, prosecution, courts and forensic interviews.
- SASP funds may not be used to support Sexual Assault Response Teams (SART). However, if an advocate position is funded under the SASP grant, the advocate's time in attending SART meetings

may be covered as part of the advocacy he or she provides.

- SASP funds may not be used for providing domestic violence services that do not relate to sexual violence.
- SASP funds may not be used to purchase food and beverage.
- SASP funds may not be used for fundraising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions.
- Unallowable costs relating to activities that compromise victim safety and recovery

The following activities have been found to jeopardize victim safety, deter or prevent physical or emotional healing for victims, or allow offenders to escape responsibility for their actions:

- Procedures or policies that exclude victims from receiving safe shelter, advocacy services, counseling, and other assistance based on their actual or perceived age, immigration status, race, religion, sexual orientation, gender identity, mental health condition, physical health condition, criminal record, work in the sex industry, or the age and/or gender of their children;
- Crafting policies that deny individuals access to services based on their relationship to the perpetrator;
- Developing materials that are not tailored to the dynamics of sexual assault or the culturally specific population to be served;
- Crafting policies or engaging in practices that impose restrictive conditions to be met by the victim in order to receive services (e.g., counseling, seeking an order for protection);
- Sharing confidential victim information with outside organizations and/or individuals without the documented consent of the victim; and
- Crafting policies that require the victim to report the sexual assault to law enforcement.
- SASP projects that engage in activities that compromise victim safety and recovery may be eliminated from further funding consideration.

See also [Chapter XVII. Unallowable Costs](#)

## Reporting Requirements

The project director is responsible for timely submission of completed program and fiscal reports. Please see [Chapter IX. Reporting Requirements](#) for specific information.

**NOTE:** The grantee is required to gather and maintain statistical data relating to grant project activities as required by CVAD. During desk audits, on-site monitoring and any other time at CVAD's discretion, CVAD may request to see the back-up data that supports the information submitted on your reports.

## Match Requirements

There is no match requirement for SASP funds.

## Contract Period

Subrecipient subawards will be issued annually for every year of the three-year application period.

The majority of the contracts are issued for a 12-month period beginning October 1, and ending September 30 of the following year. The subaward will include the amount of funds awarded for that year. During a multi-year award cycle, a contract is issued annually.

Each grantee must be in compliance with state and federal rules and in good standing with the Victim Services Support Program (VSS) requirements and procedures to receive funding in the second and third years of the cycle. The amount available to designated programs in the second and third year of the cycle will be based on the State and Federal funds available.



For more information on CVAD Contracts with subrecipients, please see [Chapter II. Post-Award Requirements, CVAD Contracts](#).

## **Non-Supplanting**

Federal funds must be used to supplement existing funds for program activities and not replace those funds, which have been appropriated for the same purpose. Potential supplanting will be the subject of application review, as well as pre-award review, post-award monitoring, and audit. If there is a potential presence of supplanting, the grant recipient will be required to supply documentation demonstrating that the reduction in non-Federal resources occurred for reasons other than the receipt or expected receipt of Federal funds.

For more information on non-supplantation and grant requirements, see [Chapter III. Financial Requirements, Grant Accountability Requirements](#).

# STOP Violence Against Women Act (STOP VAWA)

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STOP [Violence Against Women Act funds \(STOP VAWA\)](#) promote a coordinated, multidisciplinary approach to improving the criminal justice system's response to violence against women. This approach envisions a partnership among law enforcement, prosecution, the courts, victim advocates and service providers to ensure victim safety and offender accountability.

This grant program provides funding for projects that assist in efforts to reduce violence against women and men, specifically domestic violence, sexual assault, stalking, and dating violence.

Services, Training, Officers, Prosecution (STOP) funding is included in the Violence Against Women Act, which was reauthorized in 2013. STOP Violence Against Women Subrecipients must adhere to all requirements in the [VAWA Act](#)

In addition, STOP subrecipients must adhere to all requirements in the [DOJ Grants Financial Guide](#) and the [OMB Uniform Guidance](#).

[STOP Legislative Authority](#)

[STOP Violence Against Women Act certified assurances](#)

## Eligibility

Programs may include, but are not limited to:

- state offices and agencies,
- public or private nonprofit agencies,
- units of local government, nonprofit and
- non-governmental victim services programs.

A local unit of government is defined as a city, county, town, township, or other general-purpose political subdivision of a state and includes Indian tribes, which perform law enforcement functions as determined by the Secretary of the Interior.

[Statutory Definitions Under 42 U.S. C –3796gg-1-\(c\)\(3\):](#)

**Law Enforcement** – a public agency charged with policing functions, including any of its component bureaus.

**Prosecution** – any public agency charged with direct responsibility for prosecuting criminal offenders, including such agency's component bureaus.

**Victim Services** – a nonprofit, nongovernmental organization that assists domestic violence, dating violence, sexual assault, or stalking victims, including rape crisis centers, domestic violence shelters, faith-based organizations, and other organizations, with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

**Courts** – any civil or criminal, tribal, and Alaskan Village, Federal, State, local or territorial court having jurisdiction to address domestic violence, dating violence, sexual assault or stalking, including immigration, family, juvenile, and dependency courts, and the judicial officers serving in those courts, including judges, magistrate judges, commissioners, justices of the peace, or any other person with decision-making authority.

**Community Based Organization** (an organization that):



- Focuses primarily on domestic violence, dating violence, sexual assault or stalking;
- Has established a specialized culturally specific program that addresses domestic violence, dating violence, sexual assault or stalking;
- Has a primary focus on underserved populations (and includes representatives of these populations) and domestic violence, dating violence, sexual assault or stalking; or
- Obtains expertise, or shows demonstrated capacity to work effectively on domestic violence, dating violence, sexual assault or stalking through collaboration.

## Purpose Areas

The purpose of the STOP Violence Against Women Grant Program is to assist state agencies, units of local government, nonprofit, faith-based and community organizations in carrying out specific projects which offer a high probability of improving the functioning of the criminal justice system. This grant program provides funding for projects which assist organizations in their efforts to reduce violence against women focused on domestic violence, sexual assault and stalking.

The overriding objective of this funding continues to be the implementation of comprehensive strategies that are sensitive to the needs and safety of victims and hold offenders accountable for their crimes.

Programs supported with VAWA grant funds must meet one or more of the fifteen federally defined program [purpose areas](#) noted below:

1. Training law enforcement officers, judges, other court personnel, and prosecutors to more effectively identify and respond to violent crimes against women, including the crimes of sexual assault, domestic violence, and dating violence;
2. Developing, training, or expanding units of law enforcement officers, judges, other court personnel, and prosecutors specifically targeting violent crimes against women, including the crimes of sexual assault and domestic violence;
3. Developing and implementing more effective police, court, and prosecution policies, protocols, orders, and services specifically devoted to preventing, identifying, and responding to violent crimes against women, including the crimes of sexual assault and domestic violence;
4. Developing, installing, or expanding data collection and communication systems, including computerized systems, linking police, prosecutors, and courts or for the purpose of identifying and tracking arrests, protection orders, violations of protection orders, prosecutions, and convictions for violent crimes against women, including the crimes of sexual assault and domestic violence;
5. Developing, enlarging, or strengthening victim services programs, including sexual assault, domestic violence, and dating violence programs, developing or improving delivery of victim services to underserved populations, providing specialized domestic violence court advocates in courts where a significant number of protection orders are granted, and increasing reporting and reducing attrition rates for cases involving violent crimes against women, including crimes of sexual assault, domestic violence, and dating violence;
6. Developing, enlarging, or strengthening programs addressing stalking;
7. Developing, enlarging, or strengthening programs addressing the needs and circumstances of Indian tribes in dealing with violent crimes against women, including the crimes of sexual assault and domestic violence;
8. Supporting formal and informal statewide, multidisciplinary efforts, to the extent not supported by state funds, to coordinate the response of state law enforcement agencies, prosecutors, courts, victim services agencies, and other state agencies and departments, to violent crimes against women, including the crimes of sexual assault, domestic violence, and dating violence;
9. Training of sexual assault forensic medical personnel examiners in the collection and preservation of evidence, analysis, prevention, and providing expert testimony and treatment of trauma related to sexual assault;
10. Developing, enlarging, or strengthening programs to assist law enforcement, prosecutors, courts, and others to address the needs and circumstances of older and disabled women who are victims of domestic violence or sexual assault, including recognizing, investigating, and prosecuting instances of such violence or assault and targeting outreach and support, counseling, and other victim services to such older and disabled individuals;
11. Providing assistance to victims of domestic violence and sexual assault in immigration matters;
12. Maintaining core victim services and criminal justice initiatives, while supporting complementary new

- initiatives and emergency services for victims and their families;
13. Supporting the placement of special victim assistants (to be known as “Jessica Gonzales Victim Assistants”) in local law enforcement agencies to serve as liaisons between victims of domestic violence, dating violence, sexual assault, and stalking and personnel in local law enforcement agencies in order to improve the enforcement of protection orders. Jessica Gonzales Victim Assistants shall have expertise in domestic violence, dating violence, sexual assault, or stalking and may undertake the following activities—
  14. Developing, in collaboration with prosecutors, courts, and victim service providers, standardized response policies for local law enforcement agencies, including triage protocols to ensure that dangerous or potentially lethal cases are identified and prioritized;
    - Notifying persons seeking enforcement of protection orders as to what responses will be provided by the relevant law enforcement agency;
    - Referring persons seeking enforcement of protection orders to supplementary services (such as emergency shelter programs, hotlines, or legal assistance services); and
    - Taking other appropriate action to assist or secure the safety of the person seeking enforcement of a protection order
  15. To provide funding to law enforcement agencies, nonprofit nongovernmental victim services providers, and State, tribal, territorial, and local governments, (which funding stream shall be known as the Crystal Judson Domestic Violence Protocol Program) to promote—
    - The development and implementation of training for local victim domestic violence service providers, and to fund victim services personnel, to be known as “Crystal Judson Victim Advocates,” to provide supportive services and advocacy for victims of domestic violence committed by law enforcement personnel:
    - The implementation of protocols within law enforcement agencies to ensure consistent and effective responses to the commission of domestic violence by personnel within such agencies (such as the model policy promulgated by the International Association of Chiefs of Police [‘Domestic Violence by Police Officers: A Policy of the IACP, Police Response to Violence Against Women Project’ July 2003];
    - The development of such protocols in collaboration with State, tribal, territorial and local victim services providers and domestic violence coalitions.

NOTE: Any law enforcement, State, tribal, territorial, or local government agency receiving funding under the Crystal Judson Domestic Violence Protocol Program shall on an annual basis, receive additional training on the topic of incidents of domestic violence committed by law enforcement personnel from domestic violence and sexual assault nonprofit organizations and, after a period of 2 years, provide a report of the adopted protocol to the Department of Justice, including a summary of progress in implementing such protocol. As such, States are responsible for ensuring that each subgrantee receiving funds under this purpose area will receive the required annual training.

States are also responsible for ensuring that subgrantees submit their 2-year report to the Department of Justice. States and Territories must notify and provide the Office on Violence Against Women with a list of subgrantee recipients awarded STOP funds under the Crystal Judson Domestic Violence Protocol Program.

16. Developing and promoting State, local, or tribal legislation and policies that enhance best practices for responding to domestic violence, dating violence, sexual assault, and stalking (Programs would need prior authorization to use VW funds for this purpose by the Victim Services Support Program and the Office on Violence Against Women).
17. Developing, implementing, or enhancing Sexual Assault Response Teams, or other similar coordinated community responses to sexual assault;
18. Developing and strengthening policies, protocols, best practices, and training for law enforcement agencies and prosecutors relating to the investigation and prosecution of sexual assault cases and the appropriate treatment of victims;
19. Developing, enlarging, or strengthening programs addressing sexual assault against men, women, and youth in correctional and detention settings;
20. Identifying and conducting inventories of backlogs of sexual assault evidence collection kits and developing protocols and policies for responding to and addressing such backlogs, including protocols and policies for notifying and involving victims;
21. Developing, enlarging, or strengthening programs and projects to provide services and responses targeting male and female victims of domestic violence, dating violence, sexual assault, or stalking,

- whose ability to access traditional services and responses is affected by their sexual orientation or gender identity, as defined in section 249(c) of title 18, United States Code; and
22. Developing, enhancing, or strengthening prevention and educational programming to address domestic violence, dating violence, sexual assault, or stalking, with not more than 5 percent of the amount allocated to a State to be used for this purpose.

## Allowable Services/Costs

STOP VAWA funds may be used for/to:

- **Personnel, training, technical assistance, evaluation, data collection and equipment** costs to enhance the apprehension, prosecution and adjudication of persons committing violent crimes against women. Children's services must be inextricably linked to providing services to victims of domestic violence. For example, STOP funds may support the expansion of shelter services for battered women to include programs for their children.
- **Transportation costs**, in limited circumstances, that are reasonable and would enhance a woman's safety, including transportation out-of-state.
- **Operational costs of a facility**, such as a shelter, however if the project is supported with funds from other sources as well, i.e. VOCA or other funding, the rent and operational expenses must be prorated among the different funding sources. If the shelter owns its own facility, rent for use of that facility may not be charged to the grant at all; however, related expenses such as utilities and building security may be charged to the grant.
- **Outreach**; to support, inform, and provide outreach to victims about available services. For example, a shelter could distribute brochures listing the signs of domestic violence, describing the services available, and providing a hotline number to access the services. Initiatives designed to reach victims, rather than raise awareness generally, may be supported with STOP funds.
- **Pro-rated share of food for emergency client needs** and the pro-rated share of food purchases for domestic violence shelter resident's use.
- **Provide services to incarcerated victims** but only to address the domestic violence, dating violence, sexual assault, or stalking victimization experienced by the incarcerated individual, including both crimes experienced while incarcerated and crimes experienced at other points in their youth and adult lives.
- **Gift cards to clients** are only allowable to the extent that they are used for allowable costs under STOP, such as the purchase of emergency food for STOP clients or gas for victims to attend court, appointments etc., related to the victimization. However, agencies must acquire a receipt from the client which documents only allowable items (food or gas-in the example) were purchased. Without copies of these receipts, these costs will be deemed unallowable by CVAD/VSS.
- **Rent and Deposits**; to cover a victim's first month's rent. Deposits are also allowable if the subrecipient has an agreement with the landlord that the full/remaining deposit will be returned to the subrecipient and not the victim at the end of the lease.
- **Meaningful access**; agencies are encouraged to allocate funds to support activities that help to ensure individuals with disabilities and deaf individuals and persons with limited English proficiency have meaningful and full access to their programs. For example, grant funds can be used to support American Sign Language (ASL) interpreter services, language interpretation and translation services, or the purchase of adaptive equipment. Applicants proposing to use grant funds to create websites, videos and other materials must ensure that they are accessible to persons with disabilities and grant funds must be allocated for these purposes.
- **Services to LGBT victims**; to provide services to lesbian, gay, bisexual, or transgender (LGBT) victims of domestic violence, dating violence, sexual assault, and stalking. Gay, bisexual, and transgender male victims who request services cannot be refused such services based on their sex.
- **School programs**; to support programs in schools to the extent that they fit within one or more of the STOP program's statutory program purpose areas. For example, STOP funds could be used to provide support groups that meet at school for dating violence victims or to provide information to students about services available to help victims of dating violence. However, STOP funds may not support general prevention programs in schools.
- **Civil Legal Assistance**; to support civil legal assistance and advocacy services including legal information and resources and divorce for: 1) victims of domestic violence and 2) non-offending parents in matters that involve allegations of child sexual abuse. Applicants should contact OCJP prior to including divorce services in their STOP project.

- **Co-location of services.** However, if any of the underlying services at the center cannot be funded through STOP VAWA, such as substance abuse counseling, then the staffing for those services still cannot be supported through this purpose area, just the co-location. For example, co-location costs might include a centralized intake person, rent, or security.
- **SANE/SAFE programs and related activities** including: SANE/SAFE personnel; expert testimony of SANE/SAFE personnel; forensic evidence collection kits ("rape kits"); equipment, such as colposcopes, swab dryers, and lights; outreach efforts to inform victims about available services; victim advocate personnel to accompany victims through the forensic examination process; on-going counseling services for victims; and/or on-call time of the SANE/SAFE personnel.

[See also Chapter XVI. Allowable Costs](#)

## Unallowable Costs

VAWA funds may not be used for/to:

- **Children services;** to support services that focus exclusively on children.
- **Curriculum for primary or secondary schools;** to support the development or presentation of a domestic violence, sexual assault, dating violence and/or stalking curriculum for primary or secondary schools. Funds may not be used to teach primary or secondary school students from an already existing curriculum
- **Legal or defense services for perpetrators** of violence against women.
- **Public awareness campaign;** the production or broadcasting of public awareness announcements or media campaigns or community education campaigns or related activities. Grant funds may be used to support, inform, and conduct outreach to victims about available services.
- Support **inherently religious activities.**
- **Lease and/or purchase vehicles.**
- **Renovations;** including minor renovations such as painting or replacing carpeting.
- **Moving;** moving household goods to a new location or acquiring furniture or housing in a new location when a survivor is leaving a shelter.
- **Immigration fees;** for immigration fees for battered immigrant women.
- **Law Enforcement Equipment;** including uniforms, safety vests, shields, weapons, bullets, and/or armory.
- **Drug and Alcohol programs;** to pay for chemical dependency or alcohol abuse programs.
- **Research;** to conduct research.
- **Construction projects.**
- **Acquisition of land or real property.**
- **Fundraising;** including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions.
- **Substance abuse counseling.**
- **Criminal defense work,** including defending women who assault, kill, or otherwise injure their abusers.

## Unallowable Costs Relating to Activities that Compromise Victim Safety and Recovery

The following activities have been found to jeopardize victim safety, deter or prevent physical or emotional healing for victims, or allow offenders to escape responsibility for their actions and cannot be supported with STOP VAWA funds:

- Procedures or policies that exclude victims from receiving safe shelter, advocacy services, counseling, and other assistance based on their actual or perceived age, immigration status, race, religion, sexual orientation, gender identity, mental health condition, physical health condition, criminal record, work in the sex industry, or the age and/or gender of their children.
- Procedures or policies that compromise the confidentiality of information and privacy of persons receiving OVW funded services.
- Offering perpetrators the option of entering pre-trial diversion programs or placing batterers in anger management programs.
- Requiring mediation or counseling for couples as a systemic response to domestic violence or sexual assault or in situations in which child sexual abuse is alleged.



- Requiring victims to report sexual assault, stalking, or domestic violence crimes to law enforcement or forcing victims to participate in criminal proceedings.
- Relying on court-mandated batterer intervention programs that do not use the coercive power of the criminal justice system to hold batterers accountable for their behavior.
- Supporting policies or engaging in practices that impose restrictive conditions to be met by the victim in order to receive services (e.g., attending counseling, seeking an order of protection).

See also [Chapter XVII. Unallowable Costs](#)

## Reporting Requirements

The Project Director is responsible for timely submission of completed program and fiscal reports. Please see [Chapter IX. Reporting Requirements](#) for specific information.

**NOTE:** The Program is required to gather and maintain statistical data relating to grant project activities as required by CVAD. During desk audits, on-site monitoring and any other time at CVAD's discretion, CVAD may request to see the back-up data that supports the information submitted on your reports.

## Match Requirements

Match is required for all agencies, except victim service providers and tribal government organizations. For an agency to qualify under this exclusion, the recipient must be an organization that is recognized by the Internal Revenue Service (IRS) as a tax-exempt organization described in section 501(c)(3) of Title 26 of the United States Code (unless it is a Tribal governmental organization or a governmental rape crisis center in a state other than a territory).

The following provisions apply to match requirements:

1. Subgrantees may satisfy the match requirement with either cash (e.g., funds contributed from private sources or state and local governments) or in-kind services (e.g., services or goods donated by the applicant organization or other entities).
2. Funds from other federal sources may not be used to meet the match requirement.
3. Funds or in-kind resources used as match must be directly related to the project goals and objectives.
4. Subgrantees must maintain records which clearly show the source, the amount, and the timing of all matching contributions.
5. Sources of match are restricted to the same requirements as federal grant sources allocated to the project and must be documented in the same manner as federal sources, including financial and programmatic reports.

### Match Calculation:

Those funded with STOP VAWA funds will calculate their required match by taking the total amount of grant funds requested and divide by 1/3. For example, if grant funds total \$50,000, your agency must provide \$16,667 in match (50,000 divided by 3 = 16,666.67).

## Contract Period

Subrecipient subawards will be issued annually for every year of the three-year application period.

The majority of the contracts are issued for a 12-month period beginning October 1, and ending September 30 of the following year. The subaward will include the amount of funds awarded for that year. During a multi-year award cycle, a contract is issued annually.

Each grantee must be in compliance with state and federal rules and in good standing with the Victim Services Support Program (VSS) requirements and procedures to receive funding in the second and third years of the cycle. The amount available to designated programs in the second and third year of the cycle will be based on the State and Federal funds available.

For more information on CVAD Contracts with subrecipients, please see [Chapter II. Post-Award Requirements, CVAD Contracts](#).

## **Non-Supplanting**

Federal funds must be used to supplement existing funds for program activities and not replace those funds, which have been appropriated for the same purpose. Potential supplanting will be the subject of application review, as well as pre-award review, post-award monitoring, and audit. If there is a potential presence of supplanting, the grant recipient will be required to supply documentation demonstrating that the reduction in non-Federal resources occurred for reasons other than the receipt or expected receipt of Federal funds.

For more information on non-supplantation and grant requirements, see [Chapter III. Financial Requirements, Grant Accountability Requirements](#) .

# Victims of Crime Act Assistance Funds (VOCA)

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This portion of the CVAD Administrative Grant Manual is provided for use by all subrecipient staff receiving federal grant funds from the U.S. Department of Justice, Office of Justice Programs, Bureau of Justice Assistance, Victims of Crime Act Formula Grant program. It is intended to serve as reference for the programmatic requirements/responsibilities of projects funded through the Victims of Crime Act Grant Program.

See [VOCA Federal Legislative Authority](#)

VOCA subrecipients must adhere to all requirements in the [DOJ Grants Financial Guide](#) and the [OMB Uniform Guidance](#).

[VOCA certified assurances](#)

## Eligibility

Programs must be operated by a public or nonprofit agency, or a combination of such agencies, and provide direct services to crime victims. These programs include, but are not limited to:

- Sexual abuse and rape treatment centers
- Domestic abuse programs and shelters
- Child abuse programs
- Prosecutor based victim services
- Other community-based victim coalitions; and
- Support programs including those who serve survivors of homicide victims.
- Programs must also demonstrate a record of providing effective services to crime victims. This includes having community support and approval of its services, a history of providing direct services in a cost-effective manner, and financial support from other sources.

Those programs that have not yet demonstrated a record of providing services may be eligible to receive VOCA funding, if they can demonstrate that 25% of their financial support comes from non-federal sources. It is important that programs have a variety of funding sources besides federal funding in order to ensure their financial stability.

Only those services provided directly to crime victims can be funded with VOCA funds.

Programs must also abide by any additional eligibility or service criteria as established by the CVAD (Crime Victim Assistance Division) including submission of statistical and programmatic information on the use and impact of VOCA funds.

In addition, state specific requirements and clarification are listed below:

**Volunteers:** Subrecipient organizations must have volunteers unless the state 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. All requests for waivers must be made in writing to VSS providing specific details. Volunteers are not required to work in the VOCA program unless the time is used as in-kind match. All supervision, background checks, training requirements, file documentation, etc. for volunteers providing direct services to victims must be consistent with the agency policy for paid staff providing the same or similar direct service(s).

**Victim Compensation Information/Assistance:** Such assistance may include identifying and notifying crime victims of the availability of compensation, assisting them with documentation, and/or with application forms and procedures, obtaining necessary documentation, and/or checking on claim status. All victims who appear to be eligible must be notified of their right to apply for compensation from Criminal Injury Compensation.

## Purpose

In 1984, VOCA established the Crime Victims Fund in the U.S. Treasury and authorized the Fund to receive deposits of fines and penalties levied against criminals convicted of federal crimes. The Department of Justice is responsible for the distribution of the funds, which are collected by U.S. Attorney's Offices, U.S. Courts, and the U.S. Bureau of Prisons. This Fund provides the source of funding for all activities authorized by VOCA.

The purpose of the Victims of Crime Act (VOCA) is to provide high quality services that directly improve the health and well-being of victims of crime with priority given to victims of child abuse, domestic violence, sexual assault and services for previously underserved victims. The Office for Crime Victims (OVC) makes annual VOCA crime victim assistance grants from the Fund to states. The primary purpose of these grants is to support the provision of services to victims of crime throughout the nation. For the purpose of these Programs Guidelines, services are defined as those efforts that:

- Respond to the emotional and physical needs of crime victims;
- Assist primary and secondary victims of crime to stabilize their lives after victimization;
- Assist victims to understand and participate in the criminal justice system, provide victims of crime with a measure of safety and security such as boarding up broken windows and replacing or repairing locks.

The governor of each state designates the state agency that will administer the VOCA victim assistance grant program. In Iowa, the Office of the Attorney General, Crime Victim Assistance Division is the administering agency. The designated agency establishes policies and procedures. VOCA funds granted to the states are to be used by eligible public and private nonprofit organizations to provide direct services to crime victims. States have sole discretion for determining which organizations will receive funds, and in what amounts, as long as the subrecipients meet the requirements of VOCA.

## Allowable Services/Costs

VOCA subrecipients must meet all allowable cost requirements listed in the [2016 VOCA Federal Guidelines](#).

Subrecipient Allowable Services/Costs VOCA Rules, 28 CFR Part 94)

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

- a. Immediate emotional, psychological, and physical health and safety;
- b. Mental health counseling and care;
- c. Peer-support;
- d. Facilitation of participation in criminal justice and other public proceedings arising from the crime;
- e. Legal assistance;
- f. Forensic medical evidence collection examinations;
- g. Forensic interviews;
- h. Transportation;
- i. Public awareness;



- j. Transitional housing; and
- k. Relocation

28 CFR 94.119

### **What are direct services for immediate emotional, psychological, and physical health and safety?**

These are services that respond to immediate needs (other than medical care, except as specifically allowed) of crime victims, including, but not limited to:

1. Crisis intervention services;
2. Accompanying victims to hospitals for medical examinations;
3. Hotline counseling;
4. Safety planning;
5. Emergency food, shelter, clothing, and transportation;
6. Short-term (up to 45 days) in-home care and supervision services for children and adults who remain in their own homes when the offender/caregiver is removed;
7. Short-term (up to 45 days) nursing-home, adult foster care, or group- home placements for adults for whom no other safe, short-term residence is available;
8. Window, door, or lock replacement or repair, and other repairs necessary to ensure a victim's safety;
9. Costs of the following, on an emergency basis (i.e., when the State's compensation program, the victim's or in the case of a minor child, the victim's parent's or guardian'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 a 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
10. Emergency legal assistance such as for filing for restraining or protective orders, and obtaining emergency custody orders and visitation rights.
  - i. 28 CFR 94.119(a).

### **What are direct services for personal advocacy and emotional support?**

Personal advocacy and emotional support services include, but are not limited to:

1. Working with a victim to assess the impact of a crime;
2. Identification of victim's needs;
3. Case management;
4. Management of practical problems created by the victimization;
5. Identification of resources available to the victim;
6. Provision of information, referrals, advocacy, and follow-up contact for continued services, as needed; and
7. Traditional, cultural, and/or alternative therapy/healing (e.g., art therapy, yoga).

28 CFR 94.119(b).

### **What are direct services for mental health counseling and care?**

Mental health counseling care includes, but is 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. Furthermore, this provision allows for holistic therapy options to be considered: art therapy, trauma-informed yoga, court dogs, equine therapy, music therapy, etc. Also, non-traditional therapies such as healing garden, sewing circle, art therapy, music therapy, peace ceremony (especially for victims of SA).

28 CFR 94.119(c).

### **What are direct services for peer-support?**

Peer-support includes, but is not limited to, activities that provide opportunities for victims to meet other

victims, share experiences, and provide self-help, information, and emotional support. 28 CFR 94.119(d).

### **What are direct services for the 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:

1. Advocacy on behalf of a victim;
2. Accompanying a victim to offices and court;
3. Transportation, meals, and lodging to allow a victim who is not a witness to participate in a proceeding;
4. Interpreting for a non-witness victim who is Deaf or hard of hearing, or with limited English proficiency;
5. Providing child care and respite care to enable a victim who is a caregiver to attend activities related to the proceeding;
6. Notification to victims regarding key proceeding dates (e.g., trial dates, case disposition, incarceration, and parole hearings);
7. Assistance with Victim Impact Statements;
8. Assistance in recovering property that was retained as evidence; and
9. Assistance with restitution advocacy on behalf of crime victims. 28 CFR 94.119(e).

### **What are direct services for legal assistance?**

The provision of 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:

1. 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 (e.g. family matters, custody, housing, dependency matters, immigration assistance, intervention with creditors, schools, campus administration proceedings);
2. 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
3. Those actions (other than tort actions) that in the civil context, are reasonably necessary as a direct result of the victimization.

28 CFR 94.119(f).

### **What are allowable direct service costs for forensic medical evidence collection examinations?**

Forensic medical evidence collection examinations for victims are allowable 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 are encouraged to 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. 28 CFR 94.119(g).

### **When may forensic interviews be allowable direct service costs?**

Forensic interviews may be allowable for direct services with the following parameters:

Results of the interview will be used not only for law enforcement and prosecution purposes, but also for identification of victim needs such as social services, personal advocacy, case management, substance abuse treatment, and mental health services;

1. Interviews are conducted in the context of a multi-disciplinary investigation and diagnostic team, or in a specialized setting such as a child advocacy center; and
2. The interviewer is trained to conduct forensic interviews appropriate to the developmental age and abilities of children, or the developmental, cognitive, and physical or communication disabilities

presented by adults.

28 CFR 94.119(h).

### **What are direct services for transportation?**

Transportation of victims to receive services and to participate in criminal justice proceedings. 28 CFR 94.119(i).

### **What are direct services for public awareness?**

Public awareness and educational 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. 28 CFR 94.119(j).

### **What are direct services for transitional housing?**

Subject to any restrictions on amount, length of time, and eligible crimes, set by the SAA, transitional housing for victims (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. Shelters for victims of domestic violence or human trafficking would be allowable. 28 CFR 94.119(k).

### **What are direct services for relocation?**

Subject to any restrictions on amount, length of time, and eligible crimes, set by the SAA, 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. 28 CFR 94.119(k).

### **What are allowable costs for activities that support direct services?**

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

- a. Coordination of activities;
- b. Supervision of direct service providers;
- c. Multi-system, interagency, multi-disciplinary response to crime victim needs;
- d. Contracts for professional services;
- e. Automated systems and technology;
- f. Volunteer trainings; and
- g. Restorative justice.

28 CFR 94.120.

### **What about serving Incarcerated Victims?**

The rule does not require that services to incarcerated victims must be provided but merely removed the expressed prohibition on such services that existed previously. The costs permitted for direct services to incarcerated victims are the same as those permitted for such services to any crime victim as long as the services relate to the victimization and not the charge for which the individual is incarcerated. This change does not allow VOCA funding to be diverted to "prison purposes". VOCA funding is not subject to mandated reduction or reallocation for non-compliance under PREA.

### **What are coordination activities?**

Coordination activities that facilitate the provision of direct services, include, but are not limited to, State-wide coordination of victim notification systems, crisis response teams, multi-disciplinary teams, coalitions to support and assist victims, and other such programs, and salaries and expenses of such coordinators. 28 CFR 94.120(a).

## **What costs are allowable to supervise direct service providers?**

Payment of salaries and expenses of supervisory staff in a project, when the SAA determines that such staff are necessary and effectively facilitate the provision of direct services. 28 CFR 94.120(b).

## **What is a multi-system, interagency, multi-disciplinary response to crime victim needs?**

This describes activities that support a coordinated and comprehensive response to crime victim 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 multi-disciplinary 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. 28 CFR 94.120(c).

## **What are allowable contracts for professional services?**

Contracting for specialized professional services (e.g., psychological/psychiatric consultation, legal services, interpreters), at a rate not to exceed a reasonable market rate, that are not available within the organization. 28 CFR 94.120(d).

## **What are allowable 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 communications 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 the SAA after considering:

1. Whether such procurement will enhance direct services;
2. How any acquisition will be integrated into and/or enhance the program's current system;
3. The cost of installation;
4. The cost of training staff to use the automated systems and technology;
5. The ongoing operational costs, such as maintenance agreements, supplies; and
6. How additional costs relating to any acquisition will be supported. 28 CFR 94.120(e).

## **What are allowable costs for volunteer training?**

Activities in support of training volunteers on how to provide direct services when such services will be provided primarily by volunteers. 28 CFR 94.120(f).

## **What are allowable costs for restorative justice?**

Activities in support of opportunities for crime victims to meet with perpetrators, including, but not limited to, tribal community-led meetings and peace-keeping activities, if such meetings are requested or voluntarily agreed to by the victim (who may, at any point, withdraw) and have reasonably anticipated beneficial or therapeutic value to crime victims. SAAs that plan to fund this type of service should closely review the criteria for conducting these meetings, and are encouraged to discuss proposals with OVC prior to awarding VOCA funds for this type of activity. At a minimum, the following should be considered:

1. The safety and security of the victim;
2. The cost versus the benefit or therapeutic value to the victim;
3. The procedures for ensuring that participation of the victim and offenders are voluntary and that the nature of the meeting is clear;
4. The provision of appropriate support and accompaniment for the victim;
5. Appropriate debriefing opportunities for the victim after the meeting; and
6. The credentials of the facilitators. 28 CFR 94.120(g).

## **What are allowable subrecipient administrative costs?**

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

- a. Personnel costs;
- b. Skills training for staff;
- c. Training-related travel;
- d. Organizational expenses;
- e. Equipment and furniture;
- f. Operating costs;
- g. VOCA administrative time;
- h. Leasing or purchasing vehicles;
- i. Maintenance, repair, or replacement of essential items; and
- j. Project evaluation.

28 CFR 94.121.

## **What are allowable personnel costs?**

Personnel costs that are directly related to providing direct services and supporting activities such as staff and coordinator salaries expenses (including fringe benefits), and a prorated share of liability insurance.

28 CFR 94.121(a).

## **What are allowable costs for 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.

28 CFR 94.121(b).

## **What are allowable costs for 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).

28 CFR 94.121(c).

## **What are allowable costs for organizational 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.

28 CFR 94.121(d).

## **What are allowable costs for equipment and furniture?**

Expenses of 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.

28 CFR 94.121(e).

## **What are allowable costs for operating costs?**

Operating costs include but are not limited to supplies; equipment use fees; 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 Web sites and social media; and essential communication services, such as web hosts and mobile device services.

28 CFR 94.121(f).

### **When is the leasing or purchasing of vehicles allowable?**

Costs of leasing or purchasing vehicles may be allowable, as determined by the SAA after considering, at a minimum, if the vehicle is essential to the provision of direct services.

28 CFR 94.121(h).

### **What are allowable costs for 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), as determined by the SAA after considering, at a minimum, if other sources of funding are available.

28 CFR 94.121(i).

### **What are allowable costs for project evaluation?**

Costs of evaluations of specific projects (in order to determine their effectiveness), within the limits set by the SAA.

28 CFR 94.121(j).

### **Is training for individuals who will be working with victims/survivors (e.g. foster parents, interpreters, CPS, law enforcement) allowable?**

As long as the training is related to how to serve the victim, or how to connect the victim to appropriate services, it is allowable.

### **Is purchasing food allowable?**

Costs of food in emergency situations, including food for a Sheltering program, is allowable. **However, OVC has stated that food for support groups is NOT allowed.**

### **Are Coalitions eligible for Funding?**

Coalitions are eligible for funding if it supports “direct services” to victims. For example “building the capacity” of advocates who will be providing direct services, service coordination (SARTs, DARTs, CARTs, Trafficking response teams, etc.) and creation of policies, response protocols, etc.

### **Is Maternity Leave, FMLA, Short Term Disability, etc. for advocates allowable?**

These expenses may be allowable if it is based on the policies of the sub-recipient agency. Severance packages are unallowable.

### **Are Fines, Penalties, Impound Fees eligible?**

Yes, as long as the fees/fines relate back to the crime and paying these costs will aid in the victim’s ability to obtain safety, security, or stabilization following that crime. Payment of criminal Fines/Fees are unallowable.

See also [Chapter XVI Allowable Costs](#)

## **Unallowable Costs**

The following expenses detail expenses that are unallowable with VOCA funds.

Notwithstanding any other provision of the rules, no VOCA funds may be used to fund or support the following:

- a. Lobbying;



- b. Research and studies;
- c. Active investigation and prosecution of criminal activities;
- d. Fundraising;
- e. Capital expenses;
- f. Compensation for victims of crime (except as otherwise allowed in statute or rule);
- g. Medical care (except as otherwise allowed in statute or rule); and
- h. Salaries and expenses of management (except as otherwise allowed in statute or rule).
  - i. Directors, Officers and Managers Insurance.
  - j. Mortgage payments

28 CFR 94.122.

### **What are unallowable lobbying costs?**

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.

28 CFR 94.122(a).

### **What are unallowable research and study costs?**

All research and studies are unallowable, except for project evaluation under § 94.121(j).

28 CFR 94.122(b)

### **What are unallowable costs for the active investigation and prosecution of criminal activities?**

The active investigation and prosecution of criminal activity is expressly unallowable, 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.

28 CFR 94.122(c)

### **What are unallowable costs for medical care?**

All subrecipient costs for medical care are unallowable, except as otherwise allowed by other provisions of the rules.

28 CFR 94.122(d)

### **What are unallowable costs for 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 this subpart) are unallowable.

28 CFR 94.122(e)

See also [Chapter XVII Unallowable Costs](#)

## **Reporting Requirements**

The Project Director is responsible for timely submission of completed program and fiscal reports. Please see [Chapter IX-Reporting Requirements](#) for specific information.

**NOTE:** The Program is required to gather and maintain statistical data relating to grant project activities as required by CVAD. During desk audits, on-site monitoring and any other time at CVAD's discretion, CVAD may request to see the back-up data that supports the information submitted on your reports.

## **Match Requirements**

Match is required for all agencies, except tribal government organizations. Match waivers may be available

in limited circumstances with appropriate justification (\*see Match Waivers in [Chapter III Financial Requirements, Grant Accountability Requirements](#)).

The following provisions apply to match requirements:

1. Subgrantees may satisfy the match requirement with either cash (e.g., funds contributed from private sources or state and local governments) or in-kind services (e.g., services or goods donated by the applicant organization or other entities).
2. Funds from other federal sources may not be used to meet the match requirement.
3. Funds or in-kind resources used as match must be directly related to the project goals and objectives.
4. Subgrantees must maintain records which clearly show the source, the amount, and the timing of all matching contributions.
5. Sources of match are restricted to the same requirements as federal grant sources allocated to the project and must be documented in the same manner as federal sources, including financial and programmatic reports.

#### Match Calculation:

In order to calculate the VOCA match, multiply the award amount by 25%. As stated above, match must be from non-federal sources based on the VOCA award amount. Non-profit, nongovernmental victim services programs are not required to make match. For example, if your grant funds total \$150,000 your agency must provide \$37,500 in match ( $\$150,000 \times 25\% = \$37,500$ ).

## **Contract Period**

Subrecipient subawards will be issued annually for every year of the three-year application period.

The majority of the contracts are issued for a 12-month period beginning October 1, and ending September 30 of the following year. The subaward will include the amount of funds awarded for that year. During a multi-year award cycle, a contract is issued annually.

Each grantee must be in compliance with state and federal rules and in good standing with the Victim Services Support Program (VSS) requirements and procedures to receive funding in the second and third years of the cycle. The amount available to designated programs in the second and third year of the cycle will be based on the State and Federal funds available.

For more information on CVAD Contracts with subrecipients, please see [Chapter II. Post-Award Requirements, CVAD Contracts](#).

## **Non-Supplanting**

Federal funds must be used to supplement existing funds for program activities and not replace those funds, which have been appropriated for the same purpose. Potential supplanting will be the subject of application review, as well as pre-award review, post-award monitoring, and audit. If there is a potential presence of supplanting, the grant recipient will be required to supply documentation demonstrating that the reduction in non-Federal resources occurred for reasons other than the receipt or expected receipt of Federal funds.

For more information on non-supplantation and grant requirements, see [Chapter III. Financial Requirements, Grant Accountability Requirements](#).



# Iowa Domestic Abuse & Sexual Abuse Funds

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These funds are appropriated annually by the Iowa Legislature. 100% of these funds are distributed to programs providing victim services.

## Eligibility

Programs must be operated by a public or non-profit agency, or a combination of such agencies. Programs providing services to victims of domestic abuse must have the capacity to provide or arrange safe shelter for domestic abuse victims and their children. Programs providing services to sexual abuse victims must have the capacity to provide in-person support to victims at the time of a sexual abuse evidentiary examination.

These programs include, but are not limited to:

- Sexual abuse and rape crisis centers,
- Domestic abuse comprehensive programs,
- Domestic abuse comprehensive shelters,
- Survivors of homicide and other violent crime, comprehensive programs and;
- Victim service statewide hotlines
- Other community-based victim coalitions

## Purpose

Funding is intended to support domestic abuse comprehensive, sexual abuse comprehensive, survivors of homicide and other violent crime programs to provide services to victims implementing the new model of services as outlined in Iowa's [Strategic Funding & Service Plan](#). Funds are equitably distributed to Iowa's urban and rural areas based on a formula.

## Allowable Services and Costs

1. **Personnel (salary/benefits)** to support advocates who provide direct services to respond to the physical and emotional needs of victims of crime, as well as to supervise individuals providing direct services and to carry out other program needs.
2. **Transportation costs** to provide services to victims in their communities, to transport victims for safety or service needs, or to attend trainings/conferences/meetings.
3. **Operational costs of a facility** such as a shelter, however if the project is supported with funds from other sources as well, i.e. VOCA, HUD or FVPSA, the rent and operational expenses must be prorated among the different funding sources. If an agency owns a shelter, the agency may not charge rent to the grant for the use of the shelter; however, related expenses such as utilities, maintenance/repairs and building security may be charged to the grant.
4. **Community Outreach** to support, inform, and provide outreach to victims about available services. For example, a shelter could distribute brochures listing the signs of domestic violence, describing the services available, and providing a hotline number to access the services. Initiatives designed to reach victims, rather than raise awareness generally, may be supported with State SA/DA funds.
5. **Food** purchases for shelter residents, clients being relocated, or for clients in other situations as deemed necessary by the program. If food is purchased with state funds because federal funds

prohibit the purchase of food (except in emergency situations-i.e. relocating victim, etc.), you cannot use this purchase as match to your federal grant.

6. **Provide services to incarcerated victims** but only to address any victimization experienced by the incarcerated individual, including both crimes experienced while incarcerated and crimes experienced at other points in their youth and adult lives.
7. **Financial Assistance to Clients** to aid in their health, safety, security or stabilization due to victimization. Examples of client assistance include, but are not limited to, relocation costs (commercial transportation, utilities, etc.), transportation costs (bus tokens, cab fare, etc.), school supplies for children, equipment needed to return to work, household needs, etc. All expenses must be supported by itemized receipts. Cash and prepaid debit/credit cards may only be provided to clients in rare circumstances and must be documented and justified by the program with approval from CVAD.
8. **Equipment & Supplies** necessary to provide quality services to victims, or outreach to other individuals and organizations. Equipment and supplies can include, but are not limited to, laptops, cell phones, tablets, desk top computers, fax machines, copiers, cell phones, hot spots, projectors, etc.
9. **Housing Assistance**; to cover a victim's rent, mortgage, deposit, utilities, hotel/motel costs, lot rent and any other costs associated with obtaining safety and stabilization in a living arrangement. Housing assistance also includes safe, confidential shelter services.
10. **Contractual Services** such as the pro-rated monthly or annual costs for maintenance and upkeep of the program, IT support, accounting services, audit costs, cell phone service agreements, etc.
11. **Meaningful access**; agencies are encouraged to allocate funds to support activities that help to ensure individuals with disabilities, Deaf and Hard of Hearing individuals and persons with limited English proficiency have meaningful, full access to their services. For example, grant funds can be used to support American Sign Language (ASL) interpreter services, language interpretation and translation services, or the purchase of adaptive equipment. Applicants proposing to use grant funds to create websites, videos and other materials must ensure they are accessible to persons with disabilities and grant funds must be allocated for these purposes.
12. **Directors, Officers and Managers (DOM) Insurance** premiums are allowable.
13. **School programs**; outreach to students, administrators, counselors and educators about victimization and available services.
14. **Civil Legal Assistance** to support civil legal assistance and advocacy services including legal information and resources, custodial and divorce arrangements stemming from the victimization, housing advocacy, representation at campus hearings, immigration needs and any other legal needs stemming from the victimization. CVAD will not allow funds to be used for legal expenses related to criminal representation or tort cases.
15. **Co-location of services** such as Substance Abuse Programs, Mental Health Programs, Trauma Recovery Centers and other services provided to victims.
16. **Prevention** is allowed for the salary, benefits and related costs up to 20% of one FTE per service type (SA, DA, Homicide/other Violent Crimes).
17. **Fundraising** is allowed for the salary, benefits and related costs up to 20% of one FTE per CVAD funded agency.
18. **Match**; state DA/SA funds are allowable for the purposes of match on federal grant awards. CVAD encourages programs to diversify funding sources to ensure long-term sustainability so a program should demonstrate efforts of other cash and in-kind support for the CVAD funded program. Attention should be paid to match eligibility requirements for each federal fund source allocated to the program. State funds cannot be used as match for your federal grant if the expense is unallowable for that specific fund source under federal guidelines.
19. **Specialized services to historically marginalized and underserved populations.** CVAD maintains a commitment to ensuring access to survivors from all levels of ability, race, ethnicity, sexual orientation, culture, age, socioeconomic status, geographic location, gender and any other traditionally un/underserved populations across the State of Iowa, regardless of citizenship status, language spoken, or other personal characteristics.
20. **Volunteer training and coordination**
21. **24-hour crisis line services**
22. **Counseling** services provided in a safe and confidential location.
23. **Support Groups** for at least two individuals engaged in therapeutic communication. These include both traditional and non-traditional (gardening group, book club, running group, etc.) options.
24. **Education about Victim Compensation** can be provided to victims to ensure the victim understands how to apply and benefits available to ease out of pocket expenses due to the crime.
25. **Coordinated Community Response (CCR).** Funds can be used to pay for the salary and benefits of

an individual(s), to provide a coordinated community response to a type(s) of victimization(s). This could be a CCR team such as a Domestic Abuse Response Team, Sexual Abuse Response Team, etc. Other allowable duties include, but are not limited to creating protocols, MOU templates and facilitating meetings. Other related costs such as program materials, supplies, travel to meetings and to carry out other duties surrounding service coordination are eligible with these funds.

26. **Mental Health & Substance Abuse Treatment.** Funds can be used to pay for therapy and/or substance abuse treatment directly related to the victimization.
27. **Outreach, Training & Technical Assistance.** Funds can be used to train advocates, related professionals, the general public and others to deliver services, to educate others, or to enhance service provision.
28. **Public Service Campaign, Marketing, Advertising.** Funds can be used to create outreach materials such as brochures and posters, television or radio ads, social media ads, billboard ads and other reasonable methods to bring awareness and attention to the dynamics of victimization and/or the services offered by the program.

## Unallowable Costs

The following costs are ineligible with state DA and SA funds:

- Bonuses for staff
- Food and beverages for staff events including but not limited to staff meetings, agency trainings, local workgroups or task forces, etc. (Food IS an allowable expense for clients experiencing food insecurity due to the victimization, or to ensure services can be received by the client; Food for staff while at a conference/training requiring an overnight stay, is also allowable)
- Overtime without prior approval from CVAD
- Cash & prepaid debit/credit cards (except in rare circumstances with approval from CVAD)
- Legal services for criminal defense, or in tort cases
- Capital expenses; construction
- Fundraising beyond 20% of one FTE, per agency
- Agency late fees, fines and penalties (late fees, fines and penalties paid on behalf of a victim to aid in their health, safety, sustainability, and/or self-sufficiency related to victimization, are allowed)

## Reporting Requirements

The Project Director is responsible for timely submission of completed program and fiscal reports. Please see [Chapter IX-Reporting Requirements](#) for specific information.

**NOTE:** The Program is required to gather and maintain statistical data relating to grant project activities as required by CVAD. During desk audits, on-site monitoring, performance report audits and any other time at CVAD's discretion, CVAD may request to see the back-up data that supports the information submitted on your reports. CVAD will never request to see any confidential client information.

## Match Requirements

There is no match requirement for Iowa Domestic Abuse and/or Iowa Sexual Abuse funds.

## Contract Period

Subrecipient subawards will be issued annually for every year of the three-year application period.

The majority of the contracts are issued for a 12-month period beginning October 1, and ending September 30 of the following year. The subaward will include the amount of funds awarded for that year. During a multi-year award cycle, a contract is issued annually.

Each grantee must be in compliance with state and federal rules and in good standing with the Victim Services Support Program (VSS) requirements and procedures to receive funding in the second and third years of the cycle. The amount available to designated programs in the second and third year of the cycle will be based on the State and Federal funds available.

For more information on CVAD Contracts with subrecipients, please see [Chapter II. Post-Award Requirements, CVAD Contracts](#).

# Manual Files

# Manual Questions

