

# 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)

Eligibility Purpose FVPSA Definitions Allowable Services-Related Assistance Unallowable Services/Costs Reporting Requirements Match Requirements Contract Period Non Supplanting

<u>Family Violence Prevention and Services Act funds (FVPSA)</u> 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:

- 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
- 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 <u>FVPSA Final Rule</u> 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 <u>Chapter IX. Reporting Requirements</u> 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 <u>Chapter II. Post-Award</u> <u>Requirements, CVAD Contracts</u>.

## **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 <u>Chapter III. Financial</u> <u>Requirements</u>, <u>Grant Accountability Requirements</u>.

# Sexual Assault Services Program (SASP)

Eligibility Purpose Allowable Services Unallowable Costs Reporting Requirements Match Requirements Contract Period Non-Supplanting

The <u>Sexual Abuse Services Program funds (SASP or SS)</u> 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 <u>DOJ Grants Financial Guide</u> and the <u>OMB</u><u>Uniform Guidance</u>.

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 <u>pro-rated</u> 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 <u>Chapter VI. Victim Advocate Certification and Training Requirements</u> 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 <u>Chapter IX. Reporting Requirements</u> 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 <u>Chapter II. Post-Award</u> <u>Requirements, CVAD Contracts</u>.

# **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 <u>Chapter III. Financial</u> <u>Requirements</u>, <u>Grant Accountability Requirements</u>.

# STOP Violence Against Women Act (STOP VAWA)

Eligibility Purpose Areas Allowable Services Unallowable Costs Reporting Requirements Match Requirements Contract Period Non-Supplanting

STOP <u>Violence Against Women Act funds (STOP VAWA)</u> 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 <u>VAWA Act</u>

In addition, STOP subrecipients must adhere to all requirements in the <u>DOJ Grants Financial Guide</u> and the <u>OMB Uniform Guidance</u>.

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;
- 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;
- 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;
- 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 <u>Chapter IX. Reporting Requirements</u> 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 <u>Chapter II. Post-Award</u> <u>Requirements, CVAD Contracts</u>.

# **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 <u>Chapter III. Financial</u> <u>Requirements</u>, <u>Grant Accountability Requirements</u>.

# Victims of Crime Act Assistance Funds (VOCA)

Eligibility Purpose Allowable Services Unallowable Costs Reporting Requirements Match Requirements Contract Period Non-Supplanting

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 <u>DOJ Grants Financial Guide</u> and the <u>OMB</u> <u>Uniform Guidance</u>.

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 <u>2016 VOCA Federal</u> <u>Guidelines</u>.

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
- 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
- i. 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(i). 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 <u>Chapter III Financial</u> <u>Requirements</u>, <u>Grant Accountability Requirements</u>.

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 X 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 <u>Chapter II. Post-Award</u> <u>Requirements, CVAD Contracts</u>.

# **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 <u>Chapter III. Financial</u> <u>Requirements</u>, <u>Grant Accountability Requirements</u>.

# Iowa Domestic Abuse & Sexual Abuse Funds

Eligibility Purpose Allowable Services and Costs Unallowable Costs Reporting Requirements Match Requirements Contract Period

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 <u>Strategic Funding & Service Plan</u>. 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.

- 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 <u>Chapter IX-Reporting Requirements</u> 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.

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