

# Utah Office for Victims of Crime

## Matching Policy

### POLICY

#### Match Requirement Policy VOCA

Organizations receiving funding under the VOCA program are required to meet the following match requirements:

1. **Project match amount.** Sub-recipients shall contribute (*i.e.*, match) not less than twenty percent (20%) (cash or in-kind) of the total cost of each project with exceptions listed below. 25% of the sub-recipient's federal request is acceptable for calculating match.
2. **Exceptions to project match requirements.** The following are not subject to the requirement set forth in paragraph (1) of this section:
  - a. Sub-recipients that are federally-recognized American Indian or Alaska Native tribes, or projects that operate on tribal lands;
  - b. Sub-recipients that are territories or possessions of the United States (except for the Commonwealth of Puerto Rico), or projects that operate therein; and
  - c. Sub-recipients other than those previously described that have applied (through their SAAs) for, and been granted, a full or partial waiver from the Director. For more information on waiver requests see Match Waiver Policy VOCA below. match is already provided.
3. **Sources of project match.** Match contributions should be derived from non-federal sources, except as may be provided in the DOJ Grants Financial Guide, and may include, but are not limited to, the following:
  - a. *Cash; i.e.*, the value of direct funding for the project;
  - b. *Volunteered professional or personal services*, the value placed on which shall be consistent with the rate of compensation (which may include fringe benefits) paid for similar work in the program, but if the similar work is not performed in the program, the rate of compensation shall be consistent with the rate found in the labor market in which the program competes;
  - c. *Materials/Equipment*, but the value placed on lent or donated equipment shall not exceed its fair market value;
  - d. *Space and facilities*, the value placed on which shall not exceed the fair rental value of comparable space and facilities as established by an independent

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appraisal of comparable space and facilities in a privately-owned building in the same locality; and

- e. *Non-VOCA funded victim assistance activities*, including but not limited to, performing direct service, coordinating, or supervising those services, training victim assistance providers, or advocating for victims.
4. **Discounts.** Any reduction or discount provided to the sub-recipient shall be valued as the difference between what the sub-recipient paid and what the provider's nominal or fair market value is for the good or service.
5. **Use of project match.** Match contributions are restricted to the same uses, and timing deadlines for obligation and expenditure, as the project's VOCA funding.
6. **Recordkeeping for project match.** Each sub-recipient shall maintain records that clearly show the source and amount of the match contributions, and period of time for which such contributions were allocated. The basis for determining the value of personal services, materials, equipment, and space and facilities shall be documented. Volunteer services shall be substantiated by the same methods used by the sub-recipient for its paid employees (generally, this should include timesheets substantiating time worked on the project).

## Match Waiver Policy: VOCA

Blanket Match Waiver:

Due to the passage of the VOCA Fix to Sustain the Crime Victims Fund Act of 2021, UOVC is amending its Match Waiver Policy. The VOCA Fix allows State Administering Agencies (UOVC) to waive the VOCA Assistance Program matching requirements. It also requires that UOVC issue match waivers, per Section 3 of the VOCA Fix, for subrecipients during a pandemic national emergency, and for one year after it ends, including the national COVID-19 pandemic period beginning on March 1, 2020, which is currently ongoing.

It is the policy of the Utah Office for Victims of Crime (UOVC) and the UOVC Board of Directors to encourage subrecipients to meet matching requirements. A match waiver process is however in place if organizations meet the requirements of this policy.

It is the policy of UOVC to explore all options for the subgrantee to meet the match without a waiver. If a waiver is necessary and reasonable send the subgrantee the match waiver application.

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A determination about a match waiver begins with the understanding that the subgrantee is not going to meet the match. Should a match waiver be requested in full or in part, the applicant must answer the following questions before a match waiver will be considered:

1. How is the grant currently being matched?
2. What extenuating circumstances exist that impede the organization's ability to partially or fully match the VOCA/VAWA grant funds requested?
3. Has the organization considered all possible options for meeting the match with in kind and cash sources that are not being used as a match on another federal grant?
4. What methods has the organization used to consider all possible options for meeting the match requirements?
5. What steps does the organization plan to take to be able to meet the match requirement in the future?
6. If a match waiver is approved, does the organization anticipate this is a one time request or are there extenuating circumstances that will require a waiver request next year?
7. How would the denial of a match waiver impact the VOCA/VAWA project?
8. Would the program have to decline all or part of the grant award if a match waiver is not granted?

When the application comes back, review the application for justifications and other information appropriate. Adequate documentation is needed to substantiate a match waiver. See procedures below.

The Match waiver application \*must be supported by the SAA and justified in writing.. The Director typically considers factors such as local resources, annual budget changes, past ability to provide match, and whether the funding is for new or additional activities requiring additional match versus continuing activities where match is already provided.

All match waivers must be reviewed, approved and signed by the UOVC Assistant Director and UOVC Director. It is in the total discretion of the UOVC Director to determine whether to grant a partial or full match waiver.

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UOVC will submit the match waiver determinations to OVC within 30 days of approval. Prior OVC approval will be required for any match waiver requested by a subrecipient within 30 days before the subaward project end date, or after that date. UOVC anticipates this would only occur in the event of an emergency.

UOVC agrees to apply the approved match waiver percentage in (or derived from) the original waiver request to a subrecipient's modified budget to determine the new match waiver dollar amount.

Waivers will only be applicable for the duration of the subrecipient's project (i.e., not in perpetuity)

The UOVC grant staff provides appropriate monitoring to ensure compliance with matching requirements throughout the subaward period.