



## Massachusetts Office for Victim Assistance VOCA/SAFEPLAN/DDTF/HTTF Grants

### Frequently Asked Questions and Answers during COVID-19

These frequently asked questions (FAQs) are provided by the Massachusetts Office for Victim Assistance to the recipients of its state and federal grant funds. The FAQs are regarding the use of grant funds and COVID-19 response. These FAQs are updated routinely.

**Last update: June 2, 2020**

	Question	Answer
1	<b>What happens to our grant funds if we need to close our office and/or shelter or reduce the level of service/response available?</b>	MOVA is committed to working with and allowing our sub-recipients to adapt to remote work, teletherapy, remote services, etc. Your grant award will not be impacted nor reduced should your organization move to temporary remote services. We ask that grant funded programs amend administrative policies addressing work changes due to the pandemic.
2	<b>I submitted my organizations amended sick leave policy. Is there anything MOVA needs in addition to amended policies?</b>	<p>We have already received several updated administrative policies addressing work changes due to the pandemic. If additional revisions are needed, please send those revised policies to your grant manager as soon as they are available. If you are working on updating your policies and have questions, please contact your grant manager. If staff are on paid leave, timesheets will need to be provided stating leave was taken and charged appropriately to your grant. Paid leave should be prorated to funding sources in the same manner the time would have been charged if the staff were working. Prorating time, while on leave and activity tracking should be included in your revised leave policies. We understand that signatures may need to be obtained later or provided electronically.</p> <p>MOVA encourages recipients to review and update (if necessary) their written leave policies to address “unexpected or extraordinary circumstances.” Sub-recipients are required to maintain copies of the leave policies and cost documentation (as required by 2 C.F.R. § 200.302, 2 C.F.R. § 200.333, and 2 C.F.R. § 431(b)(1)) to substantiate the charging of salaries and benefits during interruption of operations or services.</p>

3	<b>What happens if a training we have already paid for with grant funds is cancelled?</b>	<p>For VOCA funded conference attendance, meetings, trainings, and other gatherings that are scheduled in the near term, sub-recipients should contact their grant managers to address issues resulting from postponed or canceled meetings, such as using grant funds to cover hotel or travel related cancellation fees and penalties. MOVA is temporarily suspending approval for training requests. Effective immediately, do not initiate any expenditures related to previously approved travel. Please do everything possible to mitigate potential expenses by cancelling as quickly as you can. Sub-recipients should try to have the airline reimburse the canceled ticket(s) in cash. However, if the airline will only refund the cancellation as a credit:</p> <ul style="list-style-type: none"> <li>• The sub-recipient should apply the credit to a future trip for the same VOCA/SAFEPLAN/DDTF grant or project.</li> <li>• If that is not possible, the sub-recipient should use the credit towards future grant program related travel.</li> <li>• If neither of those options is possible, then the sub-recipient should process the trip as a cancellation, which MOVA approves to be charged to the grant due to this mitigating circumstance.</li> </ul> <p>Please document these such changes to your grant manager, via an expenditure report or a budget amendment, for record keeping purposes.</p>
4	<b>What if we have fewer volunteer hours or donations to provide as match for our grant award as a result of COVID-19?</b>	<p>If your program finds that meeting the match requirement will be challenging due to COVID-19 (i.e. lack of volunteers or hours that can be provided, lack of donations, etc.), please contact your grants manager as soon as possible with detailed reason. MOVA can assist your program by issuing a partial match waiver for the remainder of FY20 and FY21 waivers. We recognize that this may not be something you consider immediately as you work to change the way services are delivered, but we ask that you communicate with us as soon as you notice that match is being impacted.</p>
5	<b>Can we purchase client assistance such as grocery cards, uber/lifts, and store gift cards so victims can have their basic needs met during COVID-19?</b>	<p>MOVA will allow submission of budget amendments to support necessary costs for client assistance. MOVA encourages programs to evaluate their current budgets to shift any planned travel funding to other cost categories. When amending your programs budget to include gift cards, please send your grant manager your organizations gift card policy. Client assistance in the form of gift cards is expected to be utilized in the same fiscal year in which it was purchased.</p>

6	<b>Will MOVA support virtual counseling/services and remote working?</b>	<p>Yes. MOVA is committed to working with and allowing our sub-recipients to adapt to remote work, teletherapy, remote services, etc. Your grant award will not be impacted nor reduced should your organization move to temporary remote services.</p> <p>Programs should use their existing leave policies to address employee absences. If you do not currently have policies regarding working remotely and paid administrative leave, you may wish to develop them prior to an event occurring. Provided your organization has policies in place and all staff (VOCA-funded and non-VOCA funded) are treated equally, we can continue to reimburse the funded program even if services are temporarily reduced. Please send your policy to your grants manager.</p> <p>Sub-recipients should review the DOJ Grants Financial Guide and the Part 200 Uniform Requirements (2 C.F.R. Part 200, as adopted by DOJ) (see, for example, 2 CFR 200.430 and 2 C.F.R. 200.431, under Subpart E – Cost Principles), sub-recipients established policies, to help in determining how the personnel costs may be treated during any period(s) of interruption to the performance of work under the award. You should direct any questions about allowability of costs to your grant manager.</p>
7	<b>Will MOVA continue to fund non-personnel costs (rent, utilities, etc.) if we temporarily reduce or suspend services?</b>	<p>Yes. Please notify your grant manager if you reduce or suspend services.</p>
8	<b>Is MOVA planning on releasing additional funds to help cover the costs of this crisis?</b>	<p>On March 25, 2020, MOVA released an emergency notice of intent to award additional funding to currently funded agencies who receive VOCA and/or SAFEPLAN awards. Via an emergency procurement (MGL Chapter 30B, Section 8), MOVA awarded approximately \$3.5M in VOCA funds to support currently funded agencies as they navigate the impacts of COVID-19 in providing victim services. This grant opportunity is now closed (May 2020).</p>
9	<b>Can I submit budget amendments as we navigate the situation?</b>	<p>MOVA has allow submission of budget amendments on current contracts to support necessary costs for telework. Final budget amendments for FY20 were due on May 22. This can include technology support for personnel, reimbursements to personnel for use of personal technology at home, emergency client assistance funds, or emergency rental assistance to clients, as an example. MOVA encourages programs to evaluate their current budgets to shift any planned travel funding to other cost categories.</p>

		Please submit any budget amendments or questions directly to your grant manager.
10	<b>How do I submit expenditure reports while MOVA staff works remotely?</b>	Submission of expenditure reports and the processing of reimbursements will remain in service and will continue operations as normal. Please continue to send your monthly expenditure reports to <a href="mailto:MOVAfinance@massmail.state.ma.us">MOVAfinance@massmail.state.ma.us</a> . We ask that you CC' your grant manager to ensure expenditure reports are received. If you are facing extraordinary circumstances and there is a critical need to expedite a reimbursement, please contact your grant manager. We are here to work with you and assist as we navigate the circumstances.
11	<b>I'm worried that reducing or suspending services will negatively impact our PMTs/performance measures/goals.</b>	MOVA is committed to working with and allowing our sub-recipients to adapt to remote work, teletherapy, remote services, etc. Your grant award will not be impacted and MOVA will understand if PMT reports reflect reduced services.
12	<b>Can I submit the PMT report late?</b>	For sub-recipients unable to meet original due dates, MOVA is allowing delayed submission of up to 60 days for performance measure reports due in March and April 2020. Submission of late reports will require your Grant Manager's approval. Please note that at this time, due dates for reports for the remaining fiscal year are unchanged. The due date for the January 1, 2020-March 30, 2020 report can be extended to June 30, 2020.
13	<b>Could we offer rental assistance to survivors who are in the transitional housing program during this time?</b>	MOVA is allowing budget amendments to support client emergency assistance and rental assistance during this time. Please contact your grant manager to initiate a budget amendment.
14	<b>Can we provide survivors with alternative emergency shelter accommodations such as hotels rather than fill shelter beds to capacity?</b>	Yes. MOVA recommends following the organization's current shelter policy. It is generally recommended that organizations modify existing or develop new policies to reflect changes in practice due to COVID-19 response.
15	<b>Can MOVA grant funds be used to reimburse individual staff members for the cost of increased internet bandwidth (speed) to their home or remote access site?</b>	Yes. MOVA recommends following the organization's current remote access policy. It is generally recommended that organizations modify existing or develop new policies to reflect changes in practice due to COVID-19 response.
16	<b>Can we use a video conferencing platform to hold remote multidisciplinary team (MDT) meetings?</b>	Yes, as long as the platform you choose and your team's practices related to protecting victim information are VOCA compliant. This means that the platform and your process protect victims' confidentiality (the same requirement that applies to in person MDT meetings).

		There are resources available to help you select a platform or evaluate whether the platform you use adequately protects victim information.
17	<b>If we have a survivor in one of our shelter programs who is health-compromised or is showing flu-like symptoms and we determine the best course of action is to move them to a hotel temporarily, can we use emergency assistance to pay for this cost?</b>	Yes. MOVA recommends following the organization's current shelter policy. It is generally recommended that organizations modify existing or develop new policies to reflect changes in practice due to COVID-19 response.
18	<b>If my agency wanted to use the PPP loan to pay for personnel and then shift VOCA funds in their grant off of personnel into emergency victim assistance funds to help additional survivors during the COVID-19 crisis, would that be allowable?</b>	<p>In general, as permitted by MOVA, a subrecipient may use PPP loan funds instead of VOCA Assistance funding for specific cost items (e.g., using PPP instead of VOCA funds for personnel, and using VOCA funds for other allowable costs) to best use available victim service funding under the circumstances. Subrecipients should contact their grant manager to initiate a budget amendment.</p> <p>MOVA is allowing budget amendments due to PPP loans within the parameters of the current policy. Programs must have prior approval if the following applies:</p> <ul style="list-style-type: none"> <li>• The amendment is the third or succeeding change to the budget</li> <li>• Any proposed cumulative change that exceeds 10% (or \$25,000) of the annual budget contract amount</li> <li>• The annual award is less than \$20,000</li> <li>• Any proposed changes affecting the level of direct service hours and/or the scope of the project. Examples include: <ul style="list-style-type: none"> <li>o Altering the purpose of the project, authorizing use of a subcontractor or other organization that was not identified in the original approved budget, or contracting for/transferring of award-supported efforts</li> <li>o Increasing or decreasing direct service and or personnel hours</li> </ul> </li> <li>• Any changes that removes or adds a cost category which was not included in the original budget. For example, if the cost category "travel" did not exist in the original budget, the adjustment to transfer funds from "equipment" to "travel" requires prior approval</li> <li>• Any changes to the indirect cost line</li> <li>• Any shift in funding across fiscal years or subject to Phased funding</li> </ul>

		<ul style="list-style-type: none"> <li>Any program under a corrective action plan, unresolved monitoring findings, or recommendations</li> </ul>
19	<b>What should I consider if my organization has received a PPP loan?</b>	<p>Regarding the PPP loans, we ask that you consider the following guidance on duplication and supplantation if/when receiving loan money and wanting to use the costs for payroll or other expenses currently supported by VOCA and/or SAFEPLAN funds.</p> <p><b>Duplication</b> occurs when the subrecipient uses VOCA Assistance funds to pay for specific costs already covered by other sources. For example:</p> <ul style="list-style-type: none"> <li>If the subrecipient pays a staff position from the PPP loan then draws down VOCA funds to cover the same staff position, but never pays the loan back because it was forgiven, the subrecipient may have duplicated costs (or otherwise made an improper payment, see 2 C.F.R. 200.53), unless the forgiven loan funds are allocated to a different cost item. For example: <ul style="list-style-type: none"> <li>The PPP loan paid salary for employee 1, but then reallocated to pay salary for employee 2, and then used the VOCA funds to pay for employee 1.</li> </ul> </li> <li>If the subrecipient pays back the loan, it would not be duplication.</li> </ul> <p><b>Supplanting</b> occurs when a subrecipient intentionally replaces its other state or local victim service funding sources with VOCA funding. For example:</p> <ul style="list-style-type: none"> <li>If a subrecipient uses VOCA funds to replace a PPP loan, then repays that loan instead of keeping the loan funds under the forgiveness provisions, it would not be supplanting.</li> <li>If a subrecipient uses VOCA funds to replace a PPP loan, then uses those loan funds for another expense (whether the loan is forgiven or not), it typically would not be supplanting because PPP funding is not specifically designated for victim service purposes.</li> </ul> <p>For further clarification on supplanting, please visit MOVA's VOCA Policies and Procedures Manual.</p>
20	<b>Can the PPP loan be used towards the match requirement?</b>	<p>Unless waived, subrecipients must contribute at least 25% of project costs for projects funded under VOCA Assistance. Regarding match, a subrecipient using funds from a private loan (whether forgiven later or not) is essentially a subrecipient's commitment of its own funds. Although the PPP loan is a federally guaranteed loan, OVC does not consider this loan (even if forgiven) to be</p>

		funds “paid by the Federal Government under another Federal award” for purposes of match (see 2 C.F.R. § 200.306) – thus, such funds would be a permissible source of match for VOCA Assistance projects. The subrecipient could not, however, use VOCA funds to replace those loan funds and still count the loan funds as match.
21	<b>Can I apply for a training grant?</b>	Effective March 13, MOVA has suspended the training grant applications. Programs will be notified via Constant Contact once the application is open again.
22	<b>We are looking at how best to get emergency financial resources to clients, including exploring Venmo and PayPal which would allow us to transfer cash to clients, rather than doing gift cards. Would this be allowable with VOCA funds (currently contracted or under the emergency funding)?</b>	Direct cash assistance is VOCA unallowable. Venmo/PayPal transactions would be considered unallowable.
23	<b>Is there a cap on funds per client?</b>	We have not set a cap, that would be up to the individual agencies. We encourage you to follow your agency policies.
24	<b>Some clients' circumstances necessitate cash to cover expenses. Can we provide a check directly to clients?</b>	Checks cannot be provided directly to clients, unless it is made out to the vendor (for example: Verizon, T-Mobile, National Grid, etc.)
25	<b>Can MOVA funds be used to assist with car payments and/or car insurance payments to allow survivors who use their car as a means of income (i.e. Uber, Lyft drivers) to maintain their vehicle?</b>	No. This is not an allowable expense.
26	<b>What if I cannot submit all required backup documentation at this time for my expenditure report?</b>	Please contact your grant manager if this is a challenge. Your grant manager will work with you to document what is missing in your expenditure report and will create a plan to collect necessary backup documentation when operations return to normal. MOVA reserves the right to adjust past payments accordingly if proper back-up documentation cannot be provided.