



SAFEPLAN

Policies & Procedures Manual

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The Massachusetts Victim and Witness Assistance Board

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The mission of MOVA is to empower all crime victims and witnesses in the Commonwealth of Massachusetts. MOVA strives to ensure access to equitable services, across the Commonwealth, which meet the unique needs of those impacted by crime through survivor-informed policy development, fund administration, training, and individual assistance.

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Introduction

SAFEPLAN is a court-based civil advocacy program created by Massachusetts Office for Victim Assistance (MOVA) in 1995. MOVA is authorized by the Massachusetts legislature to oversee the program. SAFEPLAN is a partnership between MOVA and community-based domestic violence and sexual assault programs.

SAFEPLAN Advocates are housed in district and probate and family courts throughout the Commonwealth, and work in collaboration with court personnel, district attorneys' offices, and other allied criminal justice and social service agencies. Together, they provide a system of advocacy for victims of domestic violence, sexual assault, and stalking considering a 209A restraining order or a 258E harassment prevention order. All SAFEPLAN Advocates are specially trained and certified to provide comprehensive services, including crisis intervention, individualized safety planning, referrals to additional critical resources, education surrounding options available, and support and advocacy services.

Purpose of Policies and Procedures Manual

To ensure that the SAFEPLAN Program provides consistent, quality, comprehensive, and coordinated services to victims of domestic violence, sexual assault, and stalking throughout the state.

To define the roles, responsibilities, and legal and programmatic requirements of Senior Advocates, Advocates, volunteers, interns, MOVA, SAFEPLAN host agencies, and others.

To ensure program accountability, define training and certification requirements, and outline supervision requirements across the SAFEPLAN Program.

Authority and Scope

The SAFEPLAN Policies and Procedures manual sets forth the requirements of the SAFEPLAN Program. This Policies and Procedures Manual was revised in November 2014, and this edition supersedes all prior editions. All participants in the SAFEPLAN Program must agree to adhere to the requirements herein.

When necessary, MOVA may place special contractual conditions upon a SAFEPLAN host agency that are not specifically articulated in this manual. MOVA and the Victim Witness Assistance Board (VWAB) reserve the right to make final decisions regarding the content of the manual. MOVA will give notice to all affected parties of intent to change the Policies and Procedures Manual.

Definitions Used in the SAFEPLAN Policies and Procedures Manual

For the purposes of the SAFEPLAN Program and this manual the following terms are defined as follows:

Client

A client is anyone who is a victim of domestic violence, sexual assault, and stalking seeking the services of the SAFEPLAN program and/or who may be eligible for protection under [M.G.L. c. 209A](#) or [M.G.L. c. 258E](#).

Direct Service

The act of assisting victims of domestic violence, sexual assault, and stalking who are seeking protection from the court through the civil 209A restraining order process ([M.G.L. c. 209A](#)) or the civil 258E harassment prevention order process ([M.G.L. c. 258E](#)). This includes, but is not limited to: assistance with protective order applications, accompaniment during court proceedings, safety planning, needs assessments, and referrals. Only trained and certified SAFEPLAN staff who are employed or associated with a SAFEPLAN host agency, may engage in direct services.

SAFEPLAN Host Agencies

Roles and Responsibilities

Hiring of SAFEPLAN Advocates. All Advocates are employees of SAFEPLAN host agencies and are subject to the hiring procedures and personnel policies of the host agency. In order for host agencies to make the final hiring decision that reflects the collaborative nature of the SAFEPLAN Program, host agencies must adapt their hiring procedures and adhere to the following guidelines. Host agencies must notify MOVA of vacancies, final hiring decisions, reductions and/or changes in direct service hours, and volunteers/interns providing direct service under the SAFEPLAN Program.

Host agencies must hire an Advocate who has the noted preferred experience¹; reflects the diversity of the clients which the SAFEPLAN Program serves, including, but not limited to bilingual bicultural advocates; passes a criminal background check – at a minimum, requested through the Commonwealth’s Department of Criminal Justice Information Systems – ([DCJIS](#)); and a reference check.

At a minimum, through host agency training and supervision, a SAFEPLAN advocate must meet the statutory requirements of “domestic violence victims’ counselor” as in [M.G.L. c.233 § 20K](#). It is strongly encouraged that all Advocates also meet the statutory requirements of a ‘sexual assault counselor’ as in [M.G.L. c.233 § 20J](#). Upon hire, host agencies must provide a salary commensurate with the level of responsibility, experience and education, within the agency guidelines; a benefits package to full-time staff, and direction regarding attendance, vacation requests, coverage, and employee benefits.

Direct Service Supervision. It is required that the host agencies provide a supervisor for the SAFEPLAN Advocate that meets the statutory requirements of a “direct service supervisor of a domestic violence victims’ program” under [M.G.L. c.233 § 20K](#). This supervisor is responsible for case specific supervision, overseeing the advocate’s client caseload and ensuring that the advocate fulfills all general job responsibilities in accordance with the SAFEPLAN Policies and Procedures Manual. For dual (domestic violence and sexual assault) agencies, they must also provide supervision for SAFEPLAN Advocates which meets the statutory requirements of a supervisor under [M.G.L. c.233 § 20J](#).

Direct Service Management. Host agencies are responsible for the day-to-day functions at each court in which they provide services. These include, but are not limited to, administrative duties, case support and guidance, direct service supervision, and as liaison with court personnel, district attorney’s office staff and MOVA.

Host agencies must notify MOVA of any changes to the policies and practices of their court within a reasonable amount of time that may affect SAFEPLAN Advocates.

Host agencies receive referrals from SAFEPLAN Advocates for services beyond those designated to be provided by SAFEPLAN Advocates. Host agencies must not expect that SAFEPLAN Advocates perform activities outlined as unallowable as defined in this manual or outside their job description on SAFEPLAN time.

It is the responsibility of the host agency to make appropriate referrals on behalf of clients to the SAFEPLAN Advocates. Any inquiries made to the host agency regarding [M.G.L. c. 209A](#) or [M.G.L. c. 258E](#) orders should be referred to the SAFEPLAN Advocate.

Memorandum of Understanding. Upon award, host agencies will be required to sign a MOU in coordination with MOVA. The MOU template will be provided by MOVA.

¹ Bachelor’s degree in relevant field (may be waived for relevant comparable level of work or life experience);
Knowledge of dynamics of domestic violence, sexual assault, and stalking;
Demonstrated ability to work collaboratively with other professionals

Court Coverage Agreement & Scheduling. MOVA and the host agency must agree on how each court will be covered, and an approved Court Coverage Agreement will remain on file at MOVA. The agreement will include the schedules and court assignments for each of the Advocates, volunteers and interns and the protocol to follow when an advocate will not be available in court. Designated in-court services must be the Advocate's primary responsibility. Advocates may provide court coverage at various courts, at one specific court or may fill in on an as needed basis at any court within their region. It is the host agency's responsibility to ensure court coverage when an Advocate is absent from court, on an emergency basis, or for a planned absence, and to notify the courts of the coverage plan.

Each host agency will abide by their established holiday policy. SAFEPLAN Advocates should be available and in court on days when courts are open. If the host agency is closed and the court is open, a backup plan should be in place prior to the date to ensure victims can access services. For example, the host agency could: request the clerk's office provide their hotline number to victims who come into court to obtain an order; provide contact information to the clerk's office for an on-call supervisor to speak with the victim; or work with the District Attorney's Office to arrange coverage. Along with the Court Coverage Agreement, each host agency is to submit a copy of their holiday policy and accompanying backup plan to MOVA.

Networking and community engagement is encouraged but may only be completed when arrangements for court coverage have been made. Allowable activities for SAFEPLAN Advocates include, but are not limited to: roundtable and task force meetings to inform direct service provision; high risk team meetings; trainings, and workshops or conferences.

Responsibilities to Victims of Domestic Violence, Sexual Assault, and Stalking. Host agencies, when hiring, should consider cultural and linguistic needs of the area they serve. If necessary, arrangements should be made for the special needs of clients who seek SAFEPLAN services.

Collaboration & Coordination. The host agency will collaborate and coordinate with the local District Attorney's Office, court personnel, and other allied partners to maximize the delivery of services to victims. SAFEPLAN host agencies must make every effort to work with the District Attorney to establish a criteria and respectful collaborative process for cross-referrals. It is expected that the host agencies have a history of community collaborations with interagency involvement.

Office Space for SAFEPLAN Advocates. SAFEPLAN host agencies must provide reasonable office space for SAFEPLAN staff that does not have office space at the courthouse. This space should be used for Advocates to store confidential files in a locked area, and to have access to a phone to offer follow-up services to clients. In situations where space is not available in the courthouse, the host agency must provide the SAFEPLAN staff with a pager or cellular phone to allow court personnel to call when SAFEPLAN services are needed.

Meetings with MOVA. MOVA staff and SAFEPLAN Advocates will meet by region on a quarterly basis to inform each other of the progress of SAFEPLAN. The host agency and MOVA will keep each other informed of both successes and barriers in providing SAFEPLAN services. SAFEPLAN Advocates are expected to attend these meetings unless client needs and/or extraordinary circumstances prevent their attendance. Part-time SAFEPLAN Advocates must attend at least one quarterly meeting a year. It is allowable for the host agency to modify the schedule of a part-time SAFEPLAN Advocate to ensure their attendance at a quarterly meeting. In these instances, the SAFEPLAN Program Coordinator is to be notified, and attendance will be addressed on a case by case basis. In addition to the quarterly meetings, MOVA will host a twice-yearly Senior SAFEPLAN Advocate meeting. The host agency's designated Senior SAFEPLAN Advocate must attend.

Publicizing of SAFEPLAN Program and Services. SAFEPLAN Advocates are specially trained and certified to provide comprehensive services, including crisis intervention, individualized safety planning, referrals to additional critical resources, education surrounding options available, support, and advocacy services. Any host agency providing SAFEPLAN services, must specify that their legal advocacy services are under the SAFEPLAN Program in any electronic or printed materials.

Official Record Keeping & Confidentiality. Host agencies must maintain confidential SAFEPLAN client files in locked file cabinets, and are the official keeper of the records in any legal proceeding where confidential records have been subpoenaed. As the keeper of the records, it is the host agency's duty to assert the domestic violence or sexual assault counselor privilege when it is challenged where it has not been waived, and to inform MOVA when confidential records are subpoenaed. Individual client files should be kept in a manner that assures client confidentiality. Additionally, host agencies must develop and implement a policy for the destruction of SAFEPLAN client records. MOVA does not provide legal counsel or advice in these circumstances, however, the grant requires that all records related to the grant must be kept for a minimum of seven years.

Any SAFEPLAN Advocate who is the subject of a subpoena or civil suit related to SAFEPLAN services must inform the host agency immediately. The SAFEPLAN Program Coordinator at MOVA must also be informed of such instances and any cases where a SAFEPLAN client's records are the subject of a subpoena or court order. SAFEPLAN Advocates may not act upon a subpoena themselves. The handling of such cases will be determined on a case by case basis in accordance with the policies of SAFEPLAN host agency.

Client communication obtained by a SAFEPLAN Advocate is confidential and privileged under [M.G.L. c.233 § 20K](#), and [M.G.L. c.233 § 20J](#) (if applicable). SAFEPLAN Advocates must adhere to the confidentiality policies of their respective host agencies. Advocates must become familiar with the protections and limitations of [M.G.L. c.233 § 20K](#), and [M.G.L. c.233 § 20J](#) (if applicable) which apply to both oral and written client communications.

In order to ensure confidentiality of records, SAFEPLAN Advocates assisting sexual assault victims with the [M.G.L. c. 258E](#) process must meet the supervisory requirements as established in [M.G.L. c.233 § 20J](#). In the event that such supervision is not provided, the Advocate will assist in filing the paperwork, explain the limits of confidentiality, address immediate safety concerns, and make an appropriate referral to a sexual assault counselor or agency.

Data Collection and Reporting. SAFEPLAN host agencies must comply with the data and statistical collection requirements as set forth by MOVA. Data collections forms will be provided by MOVA, and monthly reporting is due on the 10th of each month. Failure to comply with and/or meet the data collection requirements and reporting deadlines may result in a delay in payment and/or termination of the SAFEPLAN host agency's grant. MOVA reserves the right to update data collection requirements as needed.

Advocates are responsible for collecting, maintaining, and submitting accurate statistical data on each client they serve through the SAFEPLAN Program. This statistical information must not contain names or other identifying information of SAFEPLAN clients. SAFEPLAN Advocates are also responsible for reporting any out-of-court activities - such as supervision, meetings, and trainings - which are conducted on SAFEPLAN funded time. This data collection is a funding requirement and will be utilized by MOVA to meet our funders' reporting requirements.

Attend a SAFEPLAN Policies & Procedures Training. Programmatic and fiscal representatives of each host agency must attend a SAFEPLAN Policies & Procedures Training provided by MOVA during the first year of the grant award. Failure to meet this requirement may result in additional reporting requirements. Additional training will be available in non-competitive bid years for new staff and those who wish to have additional training.

Compliance with MOVA in monitoring the project. Monitoring activities include, but are not limited to, site visits by MOVA staff and/or staff from the federal Office for Justice Programs, monthly/quarterly statistical reporting, and submission of financial records, as required by MOVA. MOVA will conduct site visits with host agencies throughout the course of the grant to ensure compliance with policies and procedures. Host agencies are required to address any site visit report findings by the deadline as set forth by MOVA.

Notify MOVA of Programmatic Changes. Host agencies are required to submit a programmatic change form to MOVA when there is a change in the staffing of their program (resignation, hire, medical leave, etc). Any change must be reported to MOVA within **two weeks** of the time the agency/program director is notified of the

change. Any submission beyond two weeks from the change date may impact the possibility of reimbursement and will be subject to MOVA approval. Programmatic change forms must be signed by the program contact and a fiscal representative and filled out completely, including a narrative explanation as to why this change is being requested. If the programmatic change form is for a new hire, a resume must be provided.

MOVA must be notified if the Executive Director, Program, or Fiscal Contact change to ensure contact information is updated, regardless if they are on the budget.

Any and all changes which affect service delivery must be clearly marked and requested in writing to MOVA and approved prior to the change. This includes hiring temporary personnel for SAFEPLAN funded vacancies. Without prior approval, reimbursements for changes submitted may be denied. See Fiscal Policies & Procedures for information on the budget amendment process.

Use of Volunteers and/or Interns. Host agencies are required to utilize volunteers/interns to support their SAFEPLAN program. Efforts for recruitment should be tracked and documented. This documentation may include advertisements or contacts made to local colleges/universities. While allowable, volunteers/interns are not required to provide direct service in order to meet this requirement. Volunteer/intern duties may include administrative tasks as they relate to the SAFEPLAN program.

Funding and Fiscal Management. Host agencies must maintain accurate financial records and offer ongoing fiscal stability and responsibility with respect to SAFEPLAN Program services. They must comply with the SAFEPLAN fiscal policies and procedures as set forth in this manual. Additionally, host agencies must seek approval from MOVA before applying for funding for SAFEPLAN services from any additional sources.

Allow public access to all documents, papers, letters, or other materials made or received by the provider in conjunction with the sub-recipient program. It is expressly understood that substantial evidence of the provider's refusal to comply with this provision shall constitute a breach of contract. This provision does not apply to confidential client records.

Retain all financial records, supporting documents, statistical reports and other documents related to performance and compliance must be maintained for seven (7) years beginning on the first day after the final payment under each respective grant or such longer period as necessary for the resolution of any litigation, claim, negotiation, audit, or other inquiry regarding this grant award.

SAFEPLAN Advocates

Roles and Responsibilities

Please see Appendix D SAFEPLAN Advocate Roles and Responsibilities.

Best Practices - General

- At all times, Advocates must identify themselves as a SAFEPLAN Advocate from their host agency. Advocates will not identify themselves as employees of MOVA, the court or the district attorney's office.
- Maintain professional boundaries when working with clients, including but not limited to: self-assessment regarding personal concerns or difficulties working with a particular client; avoidance of entering a client's home and accepting invitations of hospitality or engaging in other social activities; avoidance of entering into friendships or dating relationships with clients (former and current), defendants (former and current), or members of clients and defendants (former and current) families from their client caseload; and avoidance of disclosing personal history of abuse or other personal issues to clients;
- Promote empathy, understanding and respect for victims of domestic violence, sexual assault, and stalking and all SAFEPLAN clients;
- Never publicly denounce or discredit other professional individuals or institutions;
- Appear in professional, courtroom appropriate attire;
- SAFEPLAN Advocates provide services to individuals identifying themselves as victims of domestic violence, sexual assault, and stalking. SAFEPLAN Advocates should use their best judgment when both parties are looking for services surrounding a protective order. SAFEPLAN Advocates should

consider when appropriate to contact their host agency to request the assistance of another SAFEPLAN Advocate;

- Attend community and criminal justice based domestic violence roundtables and high risk team meetings to inform direct service provision;
- Host agencies may impose additional boundaries and professional conduct requirements in addition to those listed above.

Best Practices – Personal and Client Safety, Court Security

- Keep identifying information, home phone numbers, home addresses of SAFEPLAN and MOVA staff, other employees, interns and volunteers confidential;
- Seek assistance from supervisors, court personnel, and law enforcement as needed in situations where an individual becomes verbally or physically menacing;
- Seek the assistance of a court officer if/when a defendant makes or attempts to make contact with a SAFEPLAN client;
- Arrange for SAFEPLAN client to wait in a secure area if they are left alone;
- Request escort services for a victim to/from the SAFEPLAN office to/from the courtroom or to/from the parking lot if the need arises;
- Contact law enforcement on behalf of a client, with the client's permission, when the client expresses concerns about returning home or to another location; and
- Comply with court security plan.

Unallowable Activities

SAFEPLAN Advocates must not act as legal counsel for a SAFEPLAN client or to other SAFEPLAN staff on behalf of a client. Advocates will not, at any time, act as their client's attorney or negotiate with a defendant's attorney in a SAFEPLAN case. Advocates must work under the philosophy that while clients are informed of their legal rights and options by an Advocate, it is the client who will choose their own course of action. Referrals for legal services are appropriate where necessary.

Advocates must avoid providing SAFEPLAN services to friends, acquaintances or relatives and/or in cases where the defendant is a friend, acquaintance, or relative. In these circumstances, the SAFEPLAN Advocate must explain to the client that Advocates are prohibited from offering services to friends, acquaintances or relatives; Call a back-up Advocate, host agency staff member, volunteer or intern (If back-up is not available, ask a victim witness advocate to assist the client. If a victim witness advocate is not available, ask court personnel for assistance); and ensure that other staff provides follow up services, up to and including accompaniment to the 10-day hearing.

It is the responsibility of the courts to provide court-certified interpreters and translators for all court proceedings. **Multi-lingual SAFEPLAN Advocates are encouraged to provide advocacy services to SAFEPLAN clients in their primary language if they have the capacity to do so, but must not provide interpretation and/or translation services for the purposes of court proceedings.** Under no circumstances should a SAFEPLAN Advocate provide interpreting and/or translation services for defendants. Advocates who are multi-lingual may assist persons known to them provided that they serve only as a translator for the services another Advocate is providing.

Advocates are prohibited from conducting mediation services, even if requested to do so by judges or court personnel. In situations when an Advocate is requested to provide mediation between client and defendant, the advocate must politely inform the judge that mediation is strictly prohibited by the SAFEPLAN Program Policies and Procedures Manual, suggest an alternative plan, such as waiting until the parties have legal representation, and/or ask for time to contact direct service supervisor if necessary.

SAFEPLAN Advocates may not provide any escort services directly to SAFEPLAN clients outside of the confines of the courthouse. SAFEPLAN Advocates must not escort clients to their homes, vehicles, or to other public places.

Advocates must avoid writing affidavits on behalf of clients.

When safety planning and discussing how to document injuries, **SAFEPLAN Advocates are prohibited from taking photos of a victim's injuries.** Host agencies are encouraged to seek information on confidentiality of records when considering maintaining possession of photographs or other materials which may be used as evidence in a criminal proceeding.

Advocates must not provide services related to a criminal matter. At all times, Advocates must refer SAFEPLAN clients to the victim witness assistance program of the local district attorney's office to address criminal matters. The Advocate should work in collaboration with the district attorney's victim witness advocate to provide [M.G.L. c. 209A](#) and/or [M.G.L. c. 258E](#) advocacy.

Advocates, even those with counseling degrees, may not provide counseling or therapy to SAFEPLAN clients. Advocates must refer clients with counseling or therapy needs to specific counseling services at the host agency or other appropriate community agency.

Advocates must not make comments to the media regarding a SAFEPLAN client, a particular SAFEPLAN case, or the SAFEPLAN Program in general without prior approval from MOVA and the host agency.

Advocates may not lobby any member of the legislature for funding for SAFEPLAN. With approval of the host agency, SAFEPLAN Advocates may participate in educational opportunities with public officials and legislators.

Advocates may not disclose any information about a client to anyone outside of the host agency without an informed, written, reasonably time-limited consent of the SAFEPLAN client. SAFEPLAN clients must be clearly advised of the possible opportunities and consequences of any release of confidential information.

Training and Certification

SAFEPLAN Certification Training

Senior Advocates, Advocates, volunteers and interns must successfully complete the entire SAFEPLAN Certification Training. MOVA facilitates all portions of the training in collaboration with host agencies and allied partners. Victim service providers outside of the SAFEPLAN Program choosing to participate in the training program strictly for educational purposes will receive a document that indicates their attendance at the training, but does not authorize them to provide SAFEPLAN services. Participants who are SAFEPLAN Advocates, Volunteers, or Interns will receive a 'SAFEPLAN Certification – Advocate Status Form', which will be completed by the host agency and submitted to MOVA when the criteria to receive SAFEPLAN certification (below) has been completed. At that time, the SAFEPLAN provider will receive a certificate authorizing their provision of SAFEPLAN services under the supervision of their host agency. SAFEPLAN Advocates, Volunteers, and Interns have one year from the date of hire to obtain their certification.

Full-time and part-time SAFEPLAN Advocates, volunteers and interns² must meet the following criteria to receive SAFEPLAN certification:

- Attendance and successful completion of host agency domestic violence training to meet [M.G.L. c.233 § 20K](#), 25 hour minimum requirements; Advocates who are employed by a dual agency must complete additional sexual assault counselor training in order to meet the statutory requirements of [M.G.L. c.233 § 20J](#); Advocates who are not employed by a dual agency are strongly encouraged to complete the sexual assault counselor training to meet the statutory requirements of [M.G.L. c.233 § 20J](#).
- Successful completion of any mandatory training offered by the SAFEPLAN host agency;
- Successful completion of SAFEPLAN Certification Training; and

² It is unallowable for volunteers and interns to provide direct services to clients in court without the presence of a certified SAFEPLAN Advocate prior to receiving their certification.

- Successful completion of at least 20 hours of shadowing a certified SAFEPLAN Advocate in court.

Senior SAFEPLAN Advocates must meet the SAFEPLAN certification requirements and the following additional criteria to qualify:

- Successful completion of training and/or demonstrated competency in personnel management and supervision;
- A minimum of two (2) years' experience as a SAFEPLAN Advocate - *preferred*.
- Each host agency must have **one** designated Senior SAFEPLAN Advocate.

Full-time and part-time SAFEPLAN Advocates must meet the following criteria to maintain SAFEPLAN certification:

- Regularly scheduled one-to-one direct service supervision;
- In court SAFEPLAN advocacy practice of a minimum of 12 hours per year;
- Completion of professional development training (such as Continuing Education Series) provided by MOVA;
- Attendance at quarterly regional meetings hosted by MOVA;

If a newly hired SAFEPLAN Advocate has previously attended a SAFEPLAN Certification Training, they will be allowed to use the completion of the training towards their certification if it has been completed after June 2010, **and** no more than three years prior to their hire as a SAFEPLAN Advocate. If a certified SAFEPLAN Advocate resigns and then returns to the position within three years, their certification will become active upon return. If the break in service is longer than three years, staff will not be able to reactivate the certification, and will have one year to complete the requirements and obtain certification.

Existing SAFEPLAN Advocates are eligible to attend a SAFEPLAN Certification Training as an opportunity for review, with approval from MOVA, and as space permits.

Advocates must attend the twice-yearly Continuing Education Training. It is allowable for the host agency to modify the schedule of a part-time SAFEPLAN Advocate to ensure their attendance at a Continuing Education Training. Attendance will be tracked and advocates will receive a certificate of completion per session, which they can use for professional development.

Host agencies and MOVA work in collaboration to implement trainings for new Advocates, volunteers and interns. Host agencies provide the initial domestic violence training required to be a "domestic violence victims' counselor" under [M.G.L. c.233 § 20K](#). For dual (domestic violence and sexual assault) host agencies, they must provide training required to be a 'sexual assault counselor' under [M.G.L. c.233 § 20J](#). Advocates at non-dual agencies are strongly encouraged to pursue sexual assault training at a community-based agency which provides it.

Advocates may attend trainings and educational seminars that directly relate to the advocate's duties, domestic or sexual violence, or the SAFEPLAN Program mission. All trainings must be approved by the host agency.

Fiscal Policies & Procedures

Purpose of Fiscal Policies & Procedures

SAFEPLAN Fiscal Policies & Procedures will serve as a primary reference manual to assist award recipients in fulfilling their fiduciary responsibility to safeguard grant funds and ensure funds are used for the purposes for which they were awarded. The guide should serve as a day-to-day management tool for all sub-recipients receiving grants from MOVA. SAFEPLAN host agencies are referred to as sub-recipients.

The Fiscal Policies & Procedures are subject change as new laws are passed or updates are made to Federal and State guidelines. For the purpose of grant making, MOVA abides by [815 CMR 2.0](#), the Commonwealth of Massachusetts Policy for state grants, federal grant awards, federal grants and subsidies.

Responsibility of MOVA

MOVA, as the funder, must perform the following responsibilities for the federal awards it makes:

- Advise sub-recipients of requirements required by federal laws, regulations, and the provisions of grants and grant agreements, as well as any supplemental requirements imposed by MOVA.
- Monitor the activities of the sub-recipient as necessary to ensure that federal awards are used for the authorized purpose in compliance with federal and state laws, regulations, and the provisions of grants or grant agreements and those performance goals are achieved.
 - The purpose of sub-recipient monitoring is to provide reasonable assurance that federal program funds are being spent in accordance with the laws, regulations, and the provisions of the grant and that the required performance goals are being achieved. Additionally, sub-recipient monitoring procedures are developed, implemented, and performed to ensure that the sub-recipient obtains the required audits, and that audit findings identified in the sub-recipient audit reports are timely and effectively resolved and corrected.
 - MOVA uses the following mechanisms to monitor sub-recipient activities throughout year:
 - Reviews monthly/quarterly financial and performance reports submitted by sub-recipient
 - Tracks timely submittals of invoices; Performs on-site site visits to examine fiscal and programmatic records, internal control plans, and to observe operations
 - MOVA seeks to conduct an on-site site visit of all sub-recipients at least once during a grant cycle.

Funding Obligation and Sources of SAFEPLAN Funding

The Board's obligation to pay under this grant program is contingent upon receipt of SAFEPLAN funds from the U.S. Department of Justice, Executive Office for Public Safety and Security, and other such agencies. The Board may terminate any agreement with a SAFEPLAN funded program if funds become unavailable at any time, as stated in the grant, or for non-compliance with any others terms stated in the grant or grant appendices.

MOVA administers funding from four federal and state sources to award grants to non-profit agencies that provide SAFEPLAN court advocacy services in local district and probate and family courts across the Commonwealth of Massachusetts. SAFEPLAN is supported with funding from the Edward J. Byrne Memorial Grant (Byrne), State Appropriation, the Violence Against Women Act (VAWA) Grant, and Victims of Crime Act (VOCA) Grant.

SAFEPLAN sub-recipients must submit an application for funding to MOVA through the RGA process defined by MOVA, and according to standard contracting procedures, requirements of the Commonwealth of Massachusetts and the applicable federal guidelines.

Funding allocations will be based on projected available funding. Specific awards will be made as funding becomes available. MOVA anticipates distributing awards in two six-month phases which may be supported by multiple funding sources.

Responsibility of Grant Recipients

In addition to complying with the policies and procedures laid out within this document sub-recipients of Federal funds must comply with:

- [OMB-Circular A-133](#), which sets standards for all organizations expending federal funds. For additional information on federal grants management, please visit the [Office of Justice Programs \(OJP\)](#) website as well as [the Office of Management and Budget's \(OMB\)](#) website to obtain copies of current circulars.

All sub-recipients must maintain adequate accounting and control procedures to ensure that funds are not used to reimburse expenses funded by or charged to other funding sources including other state sources. Any duplication of funding sources to support a service already funded will be considered supplantation and is not allowed. All allocation methods used to determine reimbursement or matching contribution expenditures must be in compliance with accounting procedures specified in the OMB Circular A-122 (for non-profit agencies); or the OMB Circular A-87 (for local government agencies).

Sub-recipients that use allocation methods to submit their reimbursement request and are unsure if their procedures meet federal standards must contact MOVA.

All sub-recipients must comply with Generally Accepted Accounting Procedures (GAAP) and applicable state and federal laws, rules and regulations. If sub-recipient staff or agency auditor has questions regarding applicable accounting procedures, please contact MOVA.

Accounting Records and Financial Management System

Sub-recipients must have a financial management system in place that is able to record and report on the receipt, obligation, and expenditure of grant funds. In addition appropriate programmatic and financial records that fully disclose the amount and disposition of funds received must be maintained. This includes financial documentation for disbursements, timesheets specifying time devoted to allowable victim services, client files; records documenting the portion of the project funded by other sources, and other records which would facilitate an effective audit.

All accounting records must be made available upon request to MOVA staff, federal Office for Justice Program staff, or their agents.

Independent Audits

Audits are due to MOVA no later than 9 months after the end of the sub-recipient's fiscal year. All agencies that are subject to an OMB Circular A-133 audit will be required to submit an OMB Circular A-133 Audit Certification Letter.

Audit costs for audits not required or performed in accordance with OMB Circular A-133 are unallowable. If the SAFEPLAN recipient did not expend \$500,000 (\$300,000 for fiscal year ending 2003 and prior) or more in Federal Funds in its fiscal year, but contracted with a certified public accountant to perform an audit, these costs may not be charged to the grant.

Audit costs, if allowable by your award, must be prorated and charged to the grant based on the ratio of all Federal grants being audited.

Uniform Financial Report (UFR)

Sub-recipients must file a properly prepared Uniform Financial Statements and Independent Auditor's Report (UFR) or a UFR cover page and Exceptions/Exemption documentation, or an alternate report approved by the Operational Services Division (OSD), and completed UFR templates. An electronic version of the UFR must be filed via the UFR eFiling application at the following Internet address: www.mass.gov/ufr. MOVA will periodically confirm the UFR submissions of all sub-recipients.

Funding source attribution statements

All materials publicizing or resulting from grant activities produced by a SAFEPLAN funded program (e.g. publications, flyers, pamphlets, advertisements, press releases and notifications) must contain an acknowledgment of grant agency assistance and state that the SAFEPLAN-funded services are provided for free. An acknowledgment of support shall be made through use of the following footnote:

"This project was supported by the Massachusetts Office for Victim Assistance through a SAFEPLAN grant from [insert the funding stream name and grant number]."

Contact MOVA for the specified funding information for your host agency.

Subgranting

SAFEPLAN funds may not be subcontracted to other organizations to provide services. When awarded a contract, it is the expectation that the awarded sub-recipient will be responsible for the provision of services. The sub-recipient assures that no grant or agreement will be made for execution of project activities or provisions of services. Though not encouraged, a sub-recipient may request that a small portion of the grant be allocated toward consultant time for specialized professional services, such as clinical supervision or interpreter services.

Supplantation

Federal funds must be used to supplement and not to supplant funds that have been appropriated for the same purpose. Therefore, awarded funds cannot be used to supplant - or replace - existing state and local funds already allocated for the same purpose.

Grant funds should not be used to purchase items or services that would otherwise be purchased with the sub-recipient's own funds for this project. Expenditure of funds for the acquisition of new equipment or services, when equipment and/or personnel required for the successful execution of projects are already available, or budgeted for within the sub-recipient organization, will be considered supplanting and will be disallowed.

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 applicant or sub-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.

Example of Supplantation:

Your agency has been awarded state dollars to employ 1 (one) Advocate in your program for a fiscal year. In addition, your agency has applied to MOVA for 1 (one) Advocate position. Your agency receives this award. The agency is then responsible for employing 2 (two) Advocate positions for the fiscal year. If the agency only uses SAFEPLAN funds to hire 1 (one) Advocate, and decides to use the state funds to hire a Program Assistant, then it is supplantation.

Cost reimbursement

This is a cost reimbursement grant. Reimbursements will be made only for expenses included in the approved program budget, and only after the approved expenses have been incurred and expensed.

Sub-recipients must request funds based upon reimbursement requirements. Funds will not be paid in a lump sum, such as by dividing the grant into a monthly or quarterly billing amount, but rather funds will be disbursed over time as the sub-recipient incurs costs, and submits an expenditure report to MOVA with back-up documentation.

To comply with the cost reimbursement grants policy, sub-recipients must first expend their own money for activities identified in the grant application. Sub-recipients will then be reimbursed by MOVA for actual costs incurred.

Program income and free services

Generating program income on SAFEPLAN funded personnel time is unallowable. All SAFEPLAN funded services must be provided free of charge, and at no cost to the client. SAFEPLAN does not allow any deviation from this provision.

Debarment, Suspension, Ineligibility and Voluntary Exclusion. SAFEPLAN funds are not available to federally and/or state debarred, suspended, and ineligible or voluntarily excluded sub-recipients should status change while a grant is in effect.

Budgeting

A detailed allowable/unallowable cost list is located in Appendix C of this document. This list provides direction in determining allowable and unallowable costs, and is not exhaustive. Contact MOVA directly for approval of any costs which are not included.

SAFEPLAN sub-recipients must allocate at least 90% of requested funds to direct service. Sub-recipients may request that a small portion, no more than 10% of the total SAFEPLAN budget, be awarded for allowable administrative costs.

Requests for funding to pay salary and fringe costs for direct services will be given priority over request for funding which include other related administrative expenses. MOVA will not consider requests that allocate less than 90% of funds toward direct services, nor will it consider requests for any unrelated administrative or overhead expenses.

Funding Categories

Personnel - Salary

Universal Financial Report (UFR) titles, as well as agency functional titles, must be utilized to define the roll of each program staff on your SAFEPLAN Budget. Please refer to Appendix A for the listing of the UFR titles.

The employees of sub-recipients must receive a salary and fringe benefits commensurate with their level of responsibility, experience and education, within the established compensation policy of the employing agency, which is to be consistently applied to both Federal and non-Federal activities, and remain in compliance with state and federal labor laws.

If a sub-recipient budgets for a specific salary or salary increase, it must pay the SAFEPLAN-funded employee that amount. Sub-recipients can pay SAFEPLAN funded employees more than the budget amount, but they cannot pay a SAFEPLAN funded employee less than the budgeted amount, unless it is a newly hired staff replacing a vacant position. Sub-recipients can use SAFEPLAN funds to pay employee salary increases only after approval from MOVA and provided they have funds to shift. The requested salary must reflect the actual hours of service supported with those SAFEPLAN funds. It is important to maintain the number of hours as reflected on the approved budget.

Personnel - Fringe

Fringe benefits in the form of employer contributions or expenses for payroll taxes (Social Security and Medicare), health/medical care, vision, dental, workmen's compensation, short/long term disability, pension plan costs, advertising costs to recruit new staff, employee training costs, and the like, are allowable, provided such benefits are granted in accordance with the established grant budget. (OMB Circular A-122)

All charges made to MOVA for personnel by sub-recipients, including, but not limited to gross salaries, payroll taxes (both employer and employee), and other fringe benefits, whether treated as direct or indirect costs, shall be based on payroll documents in accordance with the generally accepted practice of the sub-recipient and be approved by a responsible official(s) of the sub-recipient. Payroll records shall include the time and attendance reports for all individuals reimbursed by MOVA, whether they are employed full time or part time.

Where salaries and fringe benefits for employees apply to two or more grant programs, cost activities, project periods, and/or overlapping periods, proration of costs to each activity must be made based on time and/or effort reports and billed accordingly.

Time Sheets

Each person funded through SAFEPLAN must accurately account for her/his time spent working on the SAFEPLAN program.

- Time sheets are required. Time sheets must reflect after-the-fact determination of actual activity of each employee, which means that time sheets must clearly indicate the amount of time spent on SAFEPLAN program activities for full or part-time
- Time sheets must state the program name "SAFEPLAN" (or identified cost center or code) along with the grant name: SAFEPLAN/STATE, SAFEPLAN/VOCA, SAFEPLAN/VAWA, or SAFEPLAN/BYRNE" and be signed by a supervisor.
- Any method used to divide staff time between or among funding sources must have advanced approval from MOVA and comply with federal audit standards and generally accepted accounting procedures.
- An electronic system mechanism is an acceptable method of tracking the time of SAFEPLAN; however the system must be able to delineate SAFEPLAN time. If the time tracking mechanism does not allow for SAFEPLAN time to be tracked via label, code, or cost center, agency must note SAFEPLAN time on printout or report.

Medical/Extended Leave

SAFEPLAN funded staff who take medical or extended leave cannot be billed to the grant beyond the accrued vacation and sick time. The sub-recipient's time off/leave policy may be requested by MOVA at any time. Sick or vacation time charged to the grant must be well documented on time sheets, outlined in the sub-recipient personnel manual, and in accordance with applicable Massachusetts General Laws.

If a grant-funded employee resigns from a position prior to the end of the grant year, only accrued vacation and sick time will be reimbursed. This reimbursement is only allowable within the period of the grant – not to exceed 52 weeks. Notify MOVA when a staff person is making use of this policy at the time that the Programmatic Change Form is submitted.

Office and Program Supplies

Items contained in Appendix C can support agencies in providing direct services. When creating budgets, sub-recipients must abide by the language outlined in Appendix C and adhere to the 90%/10% split for direct and administrative costs.

Non-profit purchasing program

Eligible non-profit human and social service contractors (sub-recipients) can purchase commodities and services directly from statewide contractors at the low price negotiated by the Commonwealth. This helps keep down the cost of operating the programs.

Sub-recipients must meet the following criteria to be designated as eligible to participate in the Massachusetts State Purchase Program:

- Certified non-profit status - 501(c) (3) status or equivalent.
- Currently providing human and social services under contract with one or more state departments.
- Contractor's annual audit (UFR) filing with OSD must be current and non-deficient

For more information about this program, please visit the Commonwealth's [Operations Service Division's](#) website, or contact MOVA.

Travel

General travel policy

Costs incurred for travel are necessary to be able to provide ongoing direct services to victims, and must be used in a cost effective manner. Such travel may include expenses incurred for mileage, tolls, and parking. Everyday commuting expenses for an employee to get to and from work are not allowable.

Mileage rate policy

Mileage reimbursement will be made at the sub-recipient rate, not to exceed the current effective state reimbursement rate. A travel policy indicating this rate must be provided to MOVA. If a current policy exists, it must be adhered to for this grant. If no policy exists, a sub-recipient must follow the established travel policy regarding mileage reimbursement for the Commonwealth of Massachusetts. Amendments must be made if the state travel rate changes throughout the course of the grant period.

Direct services travel/travel for victims

Sub-recipients may be reimbursed for mileage, tolls, and parking expenses related to travel that a grant-funded employee makes to serve clients. In addition, reasonable costs for transporting victims to receive services may also be reimbursed. Such costs for clients may include public transportation passes (no monthly passes), cab fare, and private transportation companies.

Indirect travel/SAFEPLAN Certification Training

Indirect travel expenses are costs incurred by grant-funded employees who are traveling on official business to attend meetings or trainings related to the program. SAFEPLAN funds can support costs such as travel, meals, lodging, and registration fees to attend trainings within the state or a similar geographic area; including the SAFEPLAN Certification Training, SAFEPLAN Continuing Education Training, and other MOVA coordinated meetings – such as the twice yearly Senior SAFEPLAN Advocate Meeting and Quarterly Regional Meetings. When needed training is unavailable within the immediate geographical area, sub-recipients can request the use of SAFEPLAN funds to support training outside of the geographical area. SAFEPLAN funds cannot be used for travel-related expenses of management or for administrative training for executive directors, board members, and other individuals who do not provide direct services.

Other

Included under other may be skills training and training materials for staff. Funds may be used to purchase materials such as books, training manuals, videos for direct service providers, and costs of a trainer for in-service staff development.

Specifically, activities and costs related to such programs including presentation materials, brochures, and newspaper notices can be supported by SAFEPLAN funding.

Equipment

Equipment policy

Equipment purchased with SAFEPLAN funds must be used only for the purposes of the SAFEPLAN project. Agencies are expected to maintain internal controls on equipment based on acceptable accounting principles identified in the US DOJ, OJP Financial Guide, effective edition “Equipment Acquired with Juvenile Justice Act (OJJDP) Formula and Victims of Crime Act (OVC) Assistance (Formula) Funds.”

All purchases of furniture, equipment, computer software, electrical and computer components with a value exceeding \$1,000 must be reported to MOVA in the form of a copy of the purchase invoice and identified by an equipment ID number.

Equipment/Inventory tracking

Sub-recipient procedures for maintaining equipment (including replacement), whether acquired in whole or in part with project funds, will, at a minimum, meet the following requirements:

- Property records must be maintained which include:
 - Description of the property;
 - Serial number or other identification number;
 - Source of the property;
 - Identification of title holder;
 - Acquisition date;

- Cost of the property;
- Percentage of Federal participation in the cost of the property;
- Location of the property;
- Use and condition of the property; and
- Disposition data, including the date of disposal and sale price.

A physical inventory of the property must be taken and the results reconciled with the property records at least once every grant period. A control system must exist to ensure adequate safeguards to prevent loss; damage; or theft of the property. Any loss, damage, or theft shall be promptly and properly investigated by the recipient and sub recipient, as appropriate. Adequate maintenance procedures must exist to keep the property in good condition. For equipment tracking purposes, MOVA-provided stickers are required to be put on equipment which have been purchased using SAFEPLAN funds.

Depreciation on SAFEPLAN purchased item(s)

Depreciation is a means of allocating the cost of equipment to the time periods benefiting from the use of the assets. Depreciation methods include straight-line (costs are equally spread over each period during the asset's useful life) and accelerated (costs are higher in early periods and lower in later periods of an asset's life). MOVA requires the use of the straight-line method of depreciation.

The Useful Life of an asset is based on Generally Accepted Accounting Principles (GAAP) and should take into consideration such factors as the type of construction, historical usage patterns, technological developments and the replacement policies of the agency. Useful life periods used for grant equipment must be consistent with the useful life periods used for non-grant equipment at the agency. Useful life periods must be 3 years or more except in very unusual circumstances. If you feel a useful life of less than 3 years is justified in a particular situation, please contact MOVA for approval.

Recommended depreciation schedules for common equipment purchases are as follows:

Office Furniture – 10 years
Office Equipment; copier, fax – 5 years
Telecommunications Equipment – 3 years
IT Equipment – 3 years
Computer Software – 3 years
Safety Equipment – 3 years

Surplus equipment program

If any agency is in need of equipment; the Commonwealth of Massachusetts offers surplus items at a discounted rate. For more surplus items information, please visit the [Operations Service Division](#) website.

Procedure for Invoices

Reimbursement and reporting policy

Budgets must include only those expenses to be paid by SAFEPLAN funding. SAFEPLAN funds may only be used for approved allowable services as specified in the program narrative and allowable related direct services delivered during the grant period. Since these funds may only be used for a narrow range of allowable expenses, the approved SAFEPLAN budget rarely covers the entire cost of providing SAFEPLAN services.

Budgets are submitted to MOVA during the application process and reviewed by MOVA. Budgets should not be considered finalized, and SAFEPLAN sub-recipients should not commit funds until a grant with MOVA is executed.

This a cost reimbursement grant, so 1/12th or 1/4th billing is unallowable. Costs must be incurred within the specified grant period and must correlate with the current fiscal year approved budget.

Reimbursement and Reporting Process

Sub-recipients must submit reimbursement invoices *monthly* or *quarterly*. Sub-recipients must select one method of submitting invoices (monthly or quarterly) and must adhere to this throughout the fiscal year. If there are significant delays in monthly submissions, agency submissions will be reviewed quarterly.

Reimbursement invoices are due on the 10th day of each month or on the next business day if the 10th falls on a holiday or weekend. Delayed or late reimbursement submissions: 1) will delay reimbursement; 2) significant delay, failure to submit requested backup documentation, or significant errors will require submission of an accompanying corrective action plan prior to reimbursement. The corrective action plan should be submitted to the identified Grants Management Specialist via email and outline steps to be taken i.e. person responsible, timing considerations, and submission process to alleviate future insufficient or late submissions.

Consistent with the [Commonwealth's policy](#), payments will be issued no later than 45 days after the submission date for all error free invoices received by MOVA. For example for an invoice submission date of October 15th, the payment date would be November 30th. Sub-recipients may check on their reimbursements for the current and past fiscal year by accessing Mass Finance's [VendorWeb website](#).

Year-end process

The deadline to submit final invoices to MOVA is July 10th at 5:00pm, unless otherwise extended by MOVA. Unspent funds will be reverted to MOVA. The June bill must be the final bill for the fiscal year. Supplemental billing is not allowed and will not be considered.

Submission of backup documentation

In accordance to MOVA's Internal Controls, SAFEPLAN reimbursement invoices must include all backup documentation for all expenditures for SAFEPLAN reimbursement. A back-up documentation form is also to be completed and submitted with your invoice. SAFEPLAN billing procedures and documents will be provided to sub-recipients at the start of the grant period. It is strongly encouraged that sub-recipients submit their invoice and backup documentation electronically. MOVA reserves the right to set or adjust the threshold for appropriate backup documentation.

Budget Amendments

Sub-recipients may request a budget amendment to reallocate funds amongst line items to their approved budget. This amendment can also be used to de-obligate a portion of the award amount; however, the original award amount will not be increased by this procedure, unless there has been approval by the VWAB to do so.

Grant funds may never be shifted in the budget without the prior approval from MOVA. All budget amendment requests must be put in writing and e-mailed to the designated Grants Program Specialist. This request must include:

- A narrative describing the reason for the amendment request and the changes proposed
- A copy of the budget reflecting changes requested
- A programmatic change form, with required staff information, if staff changes are proposed
- A revised Court Coverage Agreement, if staff changes are proposed

Sub-recipients must initiate a budget amendment if:

- A grant funded staff resigns and the replacement is hired at a different salary and/or fringe rate.
- There is a need to transfer funds into or out of any cost category, or to move monies into a budget category with a zero dollar amount. For example, if the cost category "Travel" did not exist in the original budget, the adjustment to transfer funds from Equipment to Travel requires a budget amendment.

Upon approval from MOVA, sub-recipients can shift up to 10% per year of the funding of the total program budget, provided that not less than 90% of the program budget remains allocated to direct costs. The 10% includes shifts between all cost categories. Invoice payments can be held if information is not submitted correctly.

It is required that sub-recipient fiscal and programmatic staff discuss any staff changes or any other potential reason for a budget amendment prior to submitting this request to MOVA. This communication will help to prevent delays in payments due to inconsistent information. Once the budget amendment is finalized, both a programmatic and fiscal representative are required to sign the programmatic change form. Any requests submitted without both a programmatic and fiscal signature will not be reviewed.

Fraud, waste and abuse

The U.S. Department of Justice (DOJ) awards Federal grant funds to recipients and sub-recipients for specific purposes and requires them to use the funds within established guidelines. Sub-recipients are encouraged to be aware of common grant fraud schemes and to adopt effective fraud risk-management efforts within your organization, and encourage other recipients of federal awards to do the same in order to prevent and detect fraud as early as possible. A Federal award agreement is a legally binding contract. Fraud, Waste, and Abuse prevention will be addressed for sub-recipients at SAFEPLAN Guidelines Trainings. Additional information is available from the DOJ OIG website at www.usdoj.gov/oig.

Reporting Fraud, Waste, Error, and Abuse

Each sub-recipient awarded funds made available by MOVA is to promptly report any credible evidence that a principal, employee, agent, contractor, sub-recipient, or other person has submitted a false claim under the False Claims Act or has committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct involving grant funds. You may report potential fraud, waste, abuse, or misconduct to MOVA by contacting:

Director of Grants Management
1 Ashburton Place, Room 1101
Boston, MA 02108
617-586-1340

Or, you may report to the U.S. Department of Justice, Office of the Inspector General (OIG):

By Mail:
Office of the Inspector General
U.S. Department of Justice Investigations Division
950 Pennsylvania Avenue, NW. Room 4706
Washington, DC 20530

By e-mail or telephone:
Office of the Chief Financial Officer (OCFO)
Customer Service Branch (CSB) at
ask.ocfo@usdoj.gov
Office of the Inspector General (OIG) Fraud Hotline
at oig.hotline@usdoj.gov or 1-800-869-4499

Open Checkbook Law

Beginning November 2011, basic financial information subject to the public records law will be provided to the general public without a formal request. All payments made to MOVA sub-recipients will be available to the public. For further information about this project, please visit the Office of the Comptroller's website www.mass.gov/osc

Appendix A: Uniform Financial Report Titles

- *Program Manager* - An individual who has overall responsibility for the management, oversight and coordination of a programmatic functional area within or across programs.
- *Program Director* - An individual who has overall responsibility for the daily operation of one or more individual programs.
- *Assistant Program Director* - An individual who reports directly to the Program Director, acts for the Program Director in his/her absence and functions as an adviser/assistant to the Program Director.
- *Supervising Professional* - A credentialed professional (physician, psychiatrist, social worker, nurse, etc) whose primary responsibility is the supervision of fellow credentialed professionals in the daily performance of their programmatic functions.
- *Clinician* - An individual holding a Master's degree in psychology (including behavioral psychologist) or a closely related field and primarily engaged in providing diagnostic evaluations, psychological counseling/therapy or development and implementation of behavioral treatment plans.
- *Social Worker -LICSW* - An individual registered as a Licensed Independent Clinical Social Worker by the Board of Registration of Social Workers and primarily engaged in providing diagnostic evaluations, psychological counseling/therapy or development and implementation of behavioral treatment plans.
- *Social Worker-LCSW* - An individual registered as a Licensed Certified Social Worker by the Board of Registration of Social Workers and providing social work services.
- *Social Worker - LSW* - An individual registered as a Licensed Social Worker by the Board of Registration of Social Workers and providing social work services (including casework/counseling).
- *Licensed Counselor* - An individual with at least a Master's degree in counseling or a related field who is licensed by the appropriate Board of Registration and provides counseling services.
- *Counselor* - An individual who provides therapeutic or instructive counseling to program clients/service recipients.
- *Case Worker/Manager - Master's* - An individual possessing at least a Master's degree in counseling, or a closely related discipline, providing casework/case management services including service eligibility determination, service plan development, service coordination, resource development advocacy, etc.
- *Case Worker/Manager* - An individual, providing casework/case management services including service eligibility determination, service plan development service coordination, resource development advocacy, etc.
- *Direct Care/Program Staff Supervisor* - A staff member whose primary responsibility is the supervision of nonprofessional or paraprofessional direct care/program staff in the performance of their programmatic functions or whose duties involve significant responsibility for program operations or logistics. A supervisor in this component may also perform direct client care.
- *Direct Care/Program Staff III* - Staff, other than those described above, requiring a doctoral or Master's degree, specific credentials or licensure, significant experience, or specialized skills, who are responsible for the general daily care of program clients/service recipients or for primary program service delivery.
- *Direct Care/Program Staff II* - Staff, other than those described above, requiring a Bachelor's degree, experience or specific skills who are responsible for the general daily care of program clients/service recipients.

recipients or for primary program service delivery.

- *Direct Care/Program Staff I* - Staff, other than those defined above, who are responsible for the general daily care of program clients/service recipients or for primary program service. This includes relief employees on payroll.
- *Program Secretarial, Clerical Staff* - Individuals required to carry on direct program clerical activities such as program or client record keeping.
- *Program Support* - Individuals who carry out direct program activities for client health and safety.

*Note: UFR titles are required for all non-profits in the Commonwealth. Please use the appropriate titles as they pertain to program staff. If you wish to specify for example what type of counseling occurs you may list a staff title as "Counselor (Adolescent)." Executive Directors, Attorneys, and any Outreach staff may be listed under "Other"

Appendix B: Resources

FEDERAL

Office of Justice Programs Federal Financial Guide

Office of Budget Management/Circulars

STATE

Commonwealth's State Procurement Law [815 CMR 2.0](#)

Uniform Financial Reporting

Commonwealth's Bill Payment Policy

Commonwealth's Equipment Surplus

[M.G.L. c. 209A](#) – Abuse Prevention Orders

[M.G.L. c. 258E](#) – Harassment Prevention Orders

[M.G.L. c.233 § 20K](#) – Domestic Violence Victim's Counselors; confidential communications

[M.G.L. c.233 § 20J](#) - Sexual Assault; confidential communications with sexual assault counselor

NON-PROFIT

Non-Profit Accounting Basics

Appendix C - Allowable and Unallowable Costs	
Allowable Costs	
<i>Personnel - Salary & Fringe - Direct and/or Administrative</i>	
Direct Service	
Supervision	
Administrative related tasks	
<i>Office and Program Supplies – Administrative unless otherwise noted</i>	
Postage	
Printing and Reproduction	
Program and Office Supplies	
Equipment	
Internet Service DSL, Broadband, etc.	
Office Telephone	
Copier Lease/Maintenance	
Beepers/Pagers – <i>Direct</i> ; Cell Phone Service – <i>Direct</i> ; Court Telephone - <i>Direct</i>	
<i>Travel Costs – Direct, Administrative</i>	
<i>Direct</i> Service Travel (to court, etc.)	
<i>Administrative</i> Service Travel (training, supervision, meetings, etc.)	
Travel for Victims – <i>Administrative</i>	
<i>Other – Direct, Administrative</i>	
Pro-Rated Rent - <i>Direct</i>	
Malpractice Insurance; Professional Liability Insurance - <i>Administrative</i>	
Recruitment – <i>Administrative</i>	
Utilities - <i>Administrative</i>	
Outreach Materials; Program Advertising - <i>Administrative</i>	
Training Costs - <i>Administrative</i> ; SAFEPLAN Certification Training Costs, <i>Direct</i>	
Unallowable Costs	
Administrative related correspondence	
Board/Advisory Council business; Board/Advisory Council member salaries	
Building liability; Building repairs	
Contributions/donations to other than individual participants in the program	
Debts, interest, fines or penalties	
Deferred compensation match	
Employee relocation	
Entertainment	
Exclusive crime prevention activities	
Food for any purpose other than to meet immediate client needs	
Fundraising	
Land Acquisition	
Lobbying/Administrative Advocacy	
Losses on disposition of property/capital assets	
Mortgage payments	
Medical Costs	
Personal Property	
Severance for direct service staff	
Stipends/honorariums	
Vehicle Insurance; Vehicle maintenance/repairs	
Victim relocation expenses	

APPENDIX D: Roles and Responsibilities for SAFEPLAN Advocates

SAFEPLAN Advocate Roles and Responsibilities

Assist victims of domestic violence, sexual assault, and stalking who come to court seeking protective orders through:

- Crisis assessment and intervention services;
- Information on legal options and the process to obtain a protective order;
- Assistance in completing protective order application forms;
- Creation of a comprehensive, individual safety plan with each SAFEPLAN client, whether or not the client chooses to pursue the protective order³;
- Referrals to the SAFEPLAN host agency, and other referrals deemed appropriate for each individual client, or by client request;
- Connection to appropriate follow-up services and resources including, but not limited to counseling, group support, legal services or District Attorney Victim Witness Advocates;
- Discussion of the dynamics of abuse with victims of domestic violence, sexual assault, and stalking;
- Accompaniment and advocacy in court during civil proceedings;
- Availability to assist victims, in accordance with the court coverage agreement

Additional roles and responsibilities to enhance service delivery to victims:

- Development and advancement of professional and collaborative working relationships including, but not limited to, clerks, judges, attorneys, prosecutors, security officers, and victim witness advocates;
- Adherence to host agency guidelines and protocols to ensure client confidentiality;
- Attendance at regular supervision with the direct service supervisor regarding specific cases, day-to-day activities, performance evaluations, or case related guidance and overall quality of work issues;
- Attendance at MOVA quarterly regional meetings and continuing education sessions to discuss systemic advocacy issues and to receive ongoing training;
- Knowledge of the SAFEPLAN Policies and Procedures Manual and job-related tasks within the boundaries set forth by the manual;
- Performance of other SAFEPLAN-related tasks, duties and assignments as requested by host agency and MOVA

i.³ If a client refuses to undergo safety planning with the Advocate, the Advocate must document this in the client file and provide written resources to the client or information about how to access assistance in the future.