



Massachusetts Office for Victim Assistance (MOVA) Grant Sub-recipient *Policies & Procedures*

Effective July 2023

The Massachusetts Victim and Witness Assistance Board

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MOVA strives to advance victim rights by ensuring all victims and survivors of crime across the Commonwealth are supported and empowered through access to high-quality services that are trauma-informed, culturally-responsive, and reflective of diverse communities. MOVA achieves this through survivor-informed work, advocacy for enhanced victim rights and services, partnerships with agencies and individuals, and a commitment to providing funding and services for underserved and marginalized communities.

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Introduction

The Massachusetts Office for Victim Assistance (MOVA) operates under the guidance of the Victim and Witness Assistance Board (VWAB).

This manual is intended as a general summary of the policies and procedures of MOVA's grant programs. Current grant programs include SAFEPLAN, a court-based civil advocacy program for victims and survivors of crime, and Victim & Survivor Services (VSS), historically referred to as 'VOCA awards', which supports a variety of essential services for victims and survivors of crime. This manual is inclusive of all awards administered by MOVA, including but not limited to awards supported by Victims of Crime Act (VOCA), American Rescue Plan Act (ARPA), SAFEPLAN, Drunk Driving Trust Fund (DDTF), and/or general state allocations. It does not contain all state and/or federal policies related to MOVA's grant programs. It does not contain any promises or guarantees of continued funding, nor does it create or constitute an agreement or contract of any kind. MOVA contracts may be terminated at any time for non-compliance with these policies and procedures. The policies and procedures in this manual supersede and replace any pre-existing policies or practices. MOVA reserves the right to unilaterally revise, delete, and/or add to the provisions in this manual at any time, with or without notice. MOVA reserves the right to request additional documentation beyond what is outlined in this document from a sub-recipient at any time. If MOVA funded programs are supported via state funding allocations, MOVA reserves the right to waive federal grant requirements at its discretion.

Appropriations

The following appropriations represent the state and federal funding streams for which MOVA has the authority to administer via contract and/or interdepartmental service agreement (ISA):

Victim of Crime Act (VOCA)

The VWAB is the designated state authority to administer federal funds for victim services available through the Federal Victims of Crime Act of 1984 (VOCA). Via 28 CFR Part 94 Victims of Crime Act Victim Assistance Program. This federal law, passed by Congress in 1984 and amended in 1988, established the Office for Victims of Crime (OVC) and created the [Crime Victims Fund](#), which provides funds to states for victim assistance and compensation programs that offer support and services to those affected by violent crimes.

MOVA is applying the revised VOCA rule to sub-recipient funds to detail policies and procedures contained within this document. VOCA's Catalog of Federal Domestic Assistance (CFDA) number is 16.575.

SAFEPLAN

SAFEPLAN is a court-based civil advocacy program created MOVA in 1995. The SAFEPLAN Program is supported via state line item 0840-0101. 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.

Drunk Driving Trust Fund (DDTF)

MOVA is the designated state authority to administer funds from the Drunk Driving Trust Fund (DDTF) M.G.L. Chapter 10 Section 66. DDTF funding can support counseling and support services to victims, witnesses and their family members of crashes caused by persons driving under the influence of drugs

or alcohol. DDTF funding can also support the provision of information that will help to prevent operating under the influence (OUI) from occurring; educate various target audiences about the dangers and consequences of OUI; and train personnel who will be involved in assisting victims after an OUI.

Human Trafficking Trust Fund (HTTF)

MOVA is the designated state authority to administer funds from the Human Trafficking Trust Fund (HTTF) in accordance with MGL c.265 sec. 56 and MGL c.10 sec. 66A. HTTF funding can be used to provide emergency intervention and supports that address the needs of victims and survivors of human trafficking of all ages. Human trafficking includes commercial sexual exploitation and labor trafficking as defined in MGL c.265 sec. 50, 51, or similar state or federal law.

State Bridge Funding

MOVA may seek investments from the Commonwealth of Massachusetts to mitigate the declining federal VOCA funding. The Commonwealth of Massachusetts Administration & Finance (A&F) determines funding appropriations to support state Bridge funding legislation, and that it may come from general appropriations and/or American Rescue Plan Act (ARPA).

This list is not all inclusive of all funding streams which MOVA has had in the past or may have available in the future. MOVA reserves the right to amend this list as necessary.

A. Authority and Scope

This MOVA Policies and Procedures manual was most recently revised in July 2023; this edition supersedes all prior editions. The policies and procedures set forth the requirements of MOVA's grant funding sources in compliance with laws, rules and regulations of the federal and state government; it does not override any other applicable requirements of the state or federal government. MOVA and its sub-recipients are required to comply with applicable laws, rules, and regulations whether or not they are explicitly stated in these policies and procedures.

B. Eligibility

Eligible sub-recipients are not limited to entities whose sole purpose is to provide direct services to victims of crime. While this document references "victims" and "survivors," MOVA understands that not all individuals identify or define themselves with these words. The victim is not required to report the crime to law enforcement or participate in the criminal legal system to be eligible for services.

Eligible providers are those that:

- Are operated by a nonprofit organization (including tribes)
- Provide services to victims of crime
- Can demonstrate a history of providing effective services to victims of crime
- Have financial support from other sources
- Can demonstrate the organizational capacity to provide the proposed services

All eligible organizations that operate in the Commonwealth are required to register with the Attorney General's Office and submit certain financial information annually. As of June 1, 2023, any nonprofit with gross support and revenue of \$25,000 or less are no longer required to submit a Federal Form 990 as part of their annual filing and disclosures. The AGO's Non-Profit Organizations/Public Charities Division is available to help you meet these obligations so that you may obtain a certificate of solicitation. You can find instructional material and forms on the AGO's website:

<https://www.mass.gov/service-details/annual-charities-filings/>. If you have any questions, the Massachusetts Attorney General's Office Non-Profit Organizations/Public Charities Division can be contacted by phone at 617-963-2101 or by email at charities@mass.gov.

C. Certifications and Terms and Conditions

MOVA grants include certifications and terms and conditions that must be fully understood and executed in order to enter into a contract with the state and receive state and/or federal funds. Upon entering into the contract or ISA (Interdepartmental Service Agreement), the sub-recipient or child agency awarded funds is agreeing to provide services as outlined in the program narrative and the goals and objectives outlined on the logic model, utilizing the staff approved within the funding request (once approved becomes the program budget) for the designated number of service delivery hours.

Programmatic changes or budget amendments must be approved by MOVA prior to reimbursement to be in compliance with the sub-recipient's grant. Awards will not be made without a full set of signed certifications that are included in the application for funding.

D. Termination or Suspension

MOVA reserves the right to terminate any grant award (contract or ISA) with or without cause.

Termination and suspension are described in the Standard Contract Form, the Interdepartmental Service Agreement (ISA) Form, and the Commonwealth Terms and Conditions.

E. Awards

The award period and details regarding any option to renew are determined by the related Request for Grant Application (RGA). The RGA will include all potential funding sources available to support awards. Funding allocations for each contract will be identified during the award contracting process. Regardless of the award period and contract length, agency/program budgets are to be detailed by the state fiscal year. Funds are to be utilized within the fiscal year and may not be carried across fiscal years unless approved by MOVA. Requests for a no-cost extension of a period of performance are not allowed, unless approved by MOVA on a case-by-case basis.

F. Waivers and/or Exemptions

MOVA may waive and/or exempt any provision within its authority contained in the policies and procedures. Waivers cannot be given for provisions that are beyond the scope of MOVA's authority. Any sub-recipient that desires a waiver of any of the provisions of these Policies and Procedures must initiate the process in writing. A written request for a waiver does not excuse a sub-recipient from following the provisions of these Policies and Procedures. MOVA may choose to grant a request, grant a request in part, or not grant a request for a waiver.

G. Pass-Through Funding

MOVA reserves the right to authorize its sub-recipients to enter into procurement contracts (see [DOJ Grants Financial Guide](#) sec. 3.14) and subawards (see [DOJ Grants Financial Guide](#) sec. 3.8). All pass-through agencies and their sub-recipients must adhere to MOVA's Policies and Procedures. Per the [VOCA Rule](#) (§ 94.103 Part C), administrative and training costs for the pass-through entity must be within the VOCA limit, which is no more than 5% of the pass-through entities award. Administrative and training expenses for the pass-through entity may be supported via MOVA's administrative allocation and/or alternative funding means. The reporting of activities at the direct-service level must be equivalent to what would be provided if MOVA were directly overseeing sub-awards, and an effective

system of monitoring sub-awards must be used. The pass-through agency is responsible for managing and monitoring its sub-recipients' compliance with MOVA [and the Office for Victims of Crime](#) (OVC) policies and procedures.

H. Funding Priorities

The VOCA statute requires that each state allocate at least ten percent (10%) of the total VOCA award to be allocated to victims in each of the following priority areas:

- Sexual Assault
- Domestic Violence
- Child Abuse and Neglect
- Previously Underserved Victims of Crime

For purposes of this funding requirement, the VWAB has decided victims of violent crime who were previously underserved include, but are not limited to: Culturally Specific Populations, Survivors of Homicide Victim, Persons with Disabilities, LGBTQIA2+, etc. The VWAB may update funding priorities at any time.

I. VOCA Special Conditions

MOVA and the sub-recipients are required to comply with identified federal special conditions provided and signed during contracting. The federal special conditions can be found on MOVA's [website](#). Where necessary, MOVA may require a sub-recipient to adhere to additional conditions which are not specified in the policies and procedures.

II. Use of Grant Funds

A. Allowable Services

MOVA sub-recipients must provide free services to victims of crimes. Client income or financial resources may not be considered when determining eligibility for services. For the purposes of this funding, a victim is defined as a person who has experienced physical, sexual, financial, or emotional harm as the result of a crime.

MOVA funds and matching contributions (if applicable) must be used to provide allowable services to crime victims. The funding request must reflect the program narrative and contract/ISA documents, scope of services, logic model, etc. Staff titles should be consistent across all documents. MOVA grants are cost reimbursement grants, meaning that funds are paid to sub-recipient agencies after expenditures have been incurred. See 'Cost Reimbursement', under section V. Fiscal Policies & Procedures for more information on the cost reimbursement process. All proposed costs must appear on the approved budget prior to reimbursement. The following is a non-exhaustive list of services, activities and costs that are considered eligible for support with MOVA victim assistance grant funds.

Please review the [MOVA Allowable and Unallowable Costs and Services](#) document for more specific examples of allowable and unallowable services and activities.

- **Services that respond to the immediate emotional and physical needs of crime victims**
Funds may support services and activities that respond to the immediate emotional and physical needs (excluding medical care) of crime victims and offer an immediate measure of safety to crime victims.
- **Services that respond to assist victims in navigating the dynamics of victimization**
Funds may support services and activities that assist victims of crime in understanding the dynamics of victimization and in stabilizing their lives after a victimization.
- **Services that help the victim navigate the criminal legal system**
Funds may support services that are directed to the needs of the victim within the criminal legal system as they access their rights, but not primarily to the needs of criminal prosecution. Funds to cover reasonable lodging and meal expenses for these victims and/or family members as defined in M.G.L. 258B - Section 1, to remain present and participate in the criminal legal system or other public proceeding is allowable.
- **Services that assist victims in addressing issues related to victimization**
Funds may support services that assist crime victims in addressing issues related to their victimization.
- **Costs directly related to providing direct intervention services**
- **Costs that are necessary and essential to providing direct services**
- **Professional fees, under special circumstances**
- **Mental health counseling and care**

Funds may be used to support mental health counseling and care related to victimization. Included in this category is outpatient therapy/counseling for substance use treatment so long as the treatment is directly related to the victimization and is provided by a person who meets professional standards outlined in M.G.L. c 111J to provide these services in the jurisdiction in which the care is administered.

- **Legal assistance for victims**

Legal assistance services where the need for such services is a direct result of the victimization. Such services include, but are not limited to:

- Those services (other than providing criminal defense) that help victims assert their rights as victims in a criminal proceeding directly related to the victimization, or otherwise protect their safety, privacy, or other interests as victims in such a proceeding. This may include but is not limited to immigration assistance, obtaining legal documents, guardianship, divorce, and custody issues as a result of the victimization
- Motions to vacate or expunge a conviction, or similar actions, where such a legal action is permitted based on a person's being a crime victim; and
- Those actions (other than tort actions) that, in the civil context, are reasonably necessary as a direct result of the victimization.

- **Peer-support**

Including but not limited to, activities that provide opportunities for victims to meet other victims, share experiences, and provide self-help, information, and emotional support.

- **Training**

Skills training for staff: Funds designated for staff professional development training should be used for developing the skills of direct service providers so that they are better equipped to offer quality services to crime victims. MOVA encourages sub-recipients to utilize this allowable cost for the sub-recipient's MOVA funded and other direct service staff. Participation by MOVA funded staff is encouraged at meetings and/or forums related to their work. A log or record should be maintained of all trainings expensed to the award and/or attended by MOVA-funded staff.

Training related travel:

Funds may support costs associated with staff attendance at training activities held in-state. If a desired training is available outside the Commonwealth, sub-recipients must specifically request to use funds to support those costs. All out of state travel requiring a flight, train, or bus, must be approved by MOVA prior to incurring expenses via the out of state travel and training form.

Training materials:

Funds may be used to purchase staff training materials.

- **Outreach**

Funds may be used to support activities that are designed to create awareness of the services that are available to crime victims and may be considered a direct cost. See "Funding Source Attribution Statements" pg. 18 for required attribution language.

- **Multi-disciplinary team/roundtable activity**

MOVA-funded staff may participate in and represent the needs of crime victims in multi-disciplinary team and/or roundtable activities, which facilitate coordinated, comprehensive services to crime victims.

- **Specific training costs supported via the Victim Services Training Grant (VSTG)**

The Policies & Procedures manual applies to any funding awarded to support victim service trainings. Costs necessary to provide or attend trainings are allowable to the extent identified within any applicable RGA, and as approved during the related application and award process. Allowable and unallowable costs definitions will align with those outlined within this manual unless otherwise indicated within respective RGA and application.

- **Supervision of direct service providers**

Supervision of direct service providers (paid and volunteer) is an allowable expense only to the extent that such supervision is necessary and essential to providing direct services to crime victims. Time utilized for supervision is considered a direct cost.

- **Essential management-related costs**

While management activities such as those performed by the executive directors, board members, or other top-level administrators of a victim service organization should not be supported with funds unless approved by MOVA, coordination activities and roles that are integral to facilitating direct services typically are allowable. See [28 C.F.R. 94.120\(a\)-\(b\)](#); [94.121\(a\)](#); [94.122\(h\)](#).

- **Relocation & housing for victims**

Funds may be used to pay for reasonable moving and housing expenses, including but not limited to:

- Security deposits on rental housing;
- Victims' relocation costs
- Rental expenses
- Utility startup costs

Agencies utilizing funding for security deposits are to maintain a policy on paying and recouping any credited deposits. MOVA reserves the right to establish a cap or timeframe on allowable relocation expenses per client, required back up documentation, or other applicable policies to effectively administer this provision.

- **Transitional housing**

In addition to otherwise outlined relocation and housing costs, funding may support program costs for transitional housing units (i.e., rent).

- **Services for incarcerated victims**

Direct services (limited to victim services and associated activities) to incarcerated victims related to victimization(s) which occurred prior to incarceration. Incarcerated victim is defined as a detained person, as per order of the court, in association with a criminal or delinquency offense.

- **Equipment and IT**

Funds may support equipment that is used to support the agency's victim-related activities. MOVA reserves the right to pro-rate costs.

- **Food and beverage costs for participants only**

Food and/or beverages are allowable provided they are for the purpose of enhancing direct services to victims. The cost of the food and/or beverages must be reasonable. For example, water for support groups is an allowable cost.

- **Contracts for professional services - consultants**

The use of a portion of the MOVA grant to contract for specialized victim services is allowable. See pg. 30 for further requirements.

- **Contracts for specialized provider services – subcontracts**

The use of a pre-approved portion of a MOVA grant to contract for specialized services as approved by MOVA is allowable. A copy of any contract that is utilized to retain such services must be identified in the funding request proposal and must be provided to MOVA. If the contractor is not selected at the time of award, a contract, or documentation of hire and fees, must be provided to MOVA before services are rendered.

- **Pass through funds as allowed by grant award**

In instances where funds are to be sub contracted pursuant to [Title 28 Judicial Administration](#), Chapter I, Part 94, Subpart B - VOCA Victim Assistance Program, 28 CFR 94.103 (C) Pass-through administration, the sub-recipient must outline and conduct the procurement process, agree to manage sub-recipient fiscal and programmatic reporting processes, ensure compliance with MOVA Policies & Procedures and monitor sub-recipients. MOVA retains control and authority to approve, deny, terminate, or suspend any subcontract.

- **Program operating costs**

Operating costs are allowable to the extent that the cost is necessary to provide direct services and with prior approval from MOVA. Examples include but are not limited to rent, payroll expenses, travel, utilities, office supplies, and advertising.

- **Program supplies**

Program supplies are allowable to the extent that the cost is necessary to provide direct services. Examples include, but are not limited to, materials for support groups and programming, supplies for non-traditional therapeutic services, and therapeutic materials.

- **Pro-rated professional dues and memberships in an organization's name**

B. Unallowable Costs

The following list of services, activities and costs **cannot** be supported with MOVA grant funds, or matching contributions (either cash or in-kind):

- **Lobbying**

Lobbying, political activity of any kind, and administrative advocacy for victim legislation or administrative reform, whether conducted directly or indirectly, is unallowable.

- **Perpetrator rehabilitation**

Sub-recipients shall not knowingly use funds to provide traditional perpetrator rehabilitation and/or counseling which pertains to the offense leading to their incarceration.

- **Sub-recipient studies and research efforts**

Funds may not be used to pay for efforts conducted by individuals, organizations, task forces, or special commissions to study and/or research particular crime victim issues. However, funded staff may, and are encouraged to, distribute victim satisfaction surveys to program participants in efforts to track, improve or enhance funded services.

- **Activities that seek to improve the criminal legal system**

Funds cannot be used to pay for activities that are directed at prosecuting an offender and/or improving the criminal legal system's effectiveness and efficiency, such as expert testimony at a trial. Travel, lodging and meal expenses for victims subpoenaed to provide testimony in a criminal trial or other criminal matter are considered part of the criminal legal agency's responsibility and cannot be supported with MOVA funds.

- **Activities exclusively related to crime prevention**

- **Court ordered restitution**

Funds cannot be used to pay victims' restitution. 28 C.F.R. 94.122(f) expressly prohibits grant funds from being used to compensate crime victims for expenses incurred as a result of a crime, except as otherwise allowed by the Final Rule.

- **Fundraising activities**

Employees cannot engage in fundraising activities or participate in fundraisers on MOVA grant time.

- **Other organizational costs**

Organizational costs such as liability insurance on buildings and vehicles, capital expenses and/or improvements; repairs (with the exception of repairs and maintenance costs necessary to ensure victim's safety); security guards and bodyguards; property losses and expenses; real estate purchases; mortgage payments; construction costs; interest; and debts, fines, and penalties are unallowable.

- **Out-of-pocket crime victim expenses**

Out-of-pocket crime victim expenses incurred as a result of a crime or to supplement crime victim compensation awards to victims of crime for such costs as replacement of stolen property, insurance deductibles, funeral expenses (unless prior approval received from MOVA), lost wages, medical bills, etc. are unallowable.

- **Most medical costs**

Funds cannot support medical costs resulting from victimization. Funds cannot pay for nursing home care, caregiver costs, home health-care costs, in-patient treatment costs, hospital care, other types of emergency and non-emergency medical and/or dental treatment. Payments for physician fees are prohibited. While most medical costs are unallowable, funds can be used to fund a very limited number of medical expenses. These costs are often approved on an emergency basis and under certain circumstances. Costs may include prescription and non-prescription medications, prophylactic or other treatment to prevent HIV/AIDS infection or other infectious disease, durable medical equipment, and other healthcare items. See [28 C.F.R. § 94.119\(a\)\(9\)](#).

- **Professional dues and memberships in an individual's name**

- **Equipment purchases for another organization or individual to perform victim-related services**
Unless outlined in approved sub-contract agreement.
- **Establishment of training manuals and/or extensive training materials**
Unless specifically noted within an RGA as an allowable cost.
- **Payment of temporary personnel to backfill vacant positions**
Programs are prohibited from paying temporary personnel unless prior approval has been given by MOVA.
- **Food and/or beverages for most staff or organization meetings, trainings, or events (outside of allowable victim-related food costs for the provision of the funded victim services)**
- **Offering, hosting, or organizing local or regional conferences and trainings**
Unless specifically noted within an RGA as an allowable cost. Prior approval from MOVA is required.

III. Program Requirements

A. Electronic Grants Management System (eGrants)

MOVA requires sub-recipient use of its [electronic grant management system \(eGrants\)](#) and any related system and reporting requirements to be submitted through eGrants as instructed. Visit [MOVA's website](#) for more information, user manuals, and training resources.

B. Use of Volunteers

Sub-recipients are required to utilize volunteers within the contracted agency. The purpose of this is to promote community involvement and recognition of victim services, to strengthen services by building capacity; and to provide professional growth and training opportunities to volunteers and interns with an interest in contributing to victim services. Efforts for recruitment should be tracked and documented. While allowable, volunteers/unpaid staff are not required to provide direct service in order to meet this requirement. Volunteer/unpaid staff duties may include administrative tasks as they relate to the MOVA funded program.

MOVA reserves the right to waive the volunteer requirement at the request of the sub-recipient and/or at MOVA's discretion. Requests for waivers will be considered with documentation of efforts for recruitment, information on a statutory or contractual provision concerning liability or confidentiality of counselor/victim information which bars using volunteers for certain positions, or a demonstration of why other circumstances prohibit the use of volunteers. In such cases, evidence of such a provision or circumstance must be provided. A waiver request must be submitted in writing to the program coordinator. MOVA will have final discretion.

C. Civil Rights Compliance

Sub-recipients of all MOVA-administered awards are required to adhere to relevant state and federal civil rights rules and regulations. Visit MOVA's [website](#) for more information on state and federal civil rights and non-discrimination regulations and compliance resources.

Complaints alleging discrimination or unfair/unequal treatment by a MOVA-funded agency or by MOVA, in either the provision of services or in employment practices, can be filed with MOVA. Visit [MOVA's website](#) for a description of the complaint process and a form that can be completed in order to file a complaint. More information on MOVA's non-discrimination practices in employment and in the delivery of services can also be found here.

Office for Civil Rights Required Online Training

Sub-recipients are required to comply with all applicable federal civil rights laws and requirements including but not limited to the completion of the required portions of the online Office for Civil Rights Training for Grantees created by the U.S. Department of Justice Office of Justice Programs' Office for Civil Rights (OCR). The online training has been designed to assist recipients of grant funds in complying with federal civil rights obligations, statutes, and regulations that prohibit discrimination. Completion of the online training by an appropriate agency representative is required a minimum of once per MOVA grant cycle. A record of completion must be maintained by the sub-recipient agency and provided to MOVA upon request. For information on the online Civil Rights Training, visit <https://www.ojp.gov/program/civil-rights/online-training>. Required training portions include:

- Overview - Office for Civil Rights and Laws Enforced
- Services to Persons with Limited English Proficiency (LEP)
- State Administering Agencies

- Faith-Based Organizations
- American Indians - Protections for American Indians

Submission of Findings of Discrimination

Sub-recipient agencies must submit to MOVA any adverse findings of discrimination issued within the past three years based on race, color, national origin, sex, or religion from a federal or state court or federal or state administrative agency after a due process hearing. This information should be submitted to your MOVA grants manager in a timely fashion and will be submitted by MOVA to the Office for Civil Rights.

Equal Opportunity Employment Program (EEO)

As a condition for receiving Department of Justice funding authorized by the [Omnibus Crime Control and Safe Streets Act of 1968](#), all sub-recipients in receipt of federal funds must complete and submit to OCR the necessary documents to be in compliance with EEO requirements annually, such as a Verification Form and Utilization Report (if required). Depending on sub-recipient agency type, size, and award amount, requirements for compliance with EEO requirements may vary.

In order to complete the steps necessary to be in compliance with EEO requirements, sub-recipients are strongly encouraged to access the OCR online EEO Reporting Tool at <https://eeop.ocr.ojp.gov/cert/homepage>. The EEO Reporting Tool allows sub-recipients to create an organizational account and prepare and submit required documentation. Furthermore, the EEO Reporting Tool will determine individual sub-recipient agency reporting requirements based on the sub-recipient's organizational profile. Confirmation of the completion and submission of required forms must be kept on record for review by MOVA. When using the EEO Reporting Tool, all completed forms and reports can be accessed via the Verifications/Reports tab. Submission made via the EEO Reporting Tool will also generate an email notification to confirm submissions. For more information and access to the EEO Reporting Tool, visit <https://www.ojp.gov/program/civil-rights/equal-employment-opportunity-plans>. A user guide for the EEO Reporting Tool is available at <https://www.ojp.gov/EEOReportTool> [JobAid](#).

Non-discrimination in the Provision of Services and Employment Practices

Sub-recipients are prohibited from discriminating either in employment or in the delivery of services or benefits on the basis of race, color, national origin, religion, sex or disability. [Massachusetts state law](#) further prohibits discrimination based on sexual orientation and gender identity.

Sub-recipients are required to develop practices to mitigate discrimination in the provision of services to participants and beneficiaries and/or prospective participants and beneficiaries. These practices must be documented in internal policies and/or procedures with information on how participants and beneficiaries or prospective participants and beneficiaries are informed of non-discrimination practices and how to file a complaint alleging discrimination. Additionally, sub-recipients are required to develop methods of informing employees or prospective employees of non-discrimination in employment practices. These methods must be documented in internal policies and/or procedures with information on how employees or prospective employees are informed of non-discrimination in employment practices and how to file a complaint alleging discrimination. Complaint processes for both participants and beneficiaries/prospective participants and beneficiaries and employees/prospective employees, are to incorporate due process standards and provide for the prompt and equitable resolution of a complaint. Information such as an explanation of how a complaint of discrimination can be filed, the designated employee/position responsible for coordinating the complaint process, an explanation of how the organization will investigate and resolve the complaint, and an anticipation timeline for response, investigation and resolution should be included.

Limited English Proficiency (LEP) Access

In accordance with the Department of Justice Guidance pertaining to [Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d](#), sub-recipients must agree to take reasonable steps to provide meaningful access to their programs and activities for persons with limited English proficiency. Written practices that ensure access to necessary forms of written and verbal communication must be documented in sub-recipient policy and/or procedure. For more information on LEP requirements visit <https://www.ojp.gov/program/civil-rights/limited-english-proficient-lep>.

D. Civil Rights Statistics

Sub-recipients must collect, maintain, and report statutorily required civil rights statistics on victims receiving assistance, where such information is voluntarily furnished by the victim (by race or national origin, sex, age, and disability, within the MOVA grant period); and permit reasonable access to accounting records, documents, papers, and other records to determine compliance with applicable civil rights laws.

E. Maintain victim confidentiality

Sub-recipients must abide by their confidentiality policy and cannot use or reveal any victim information without the consent of the victim. MOVA reserves the right to review any documentation to confirm that the provision of services did occur, for the purposes of program monitoring. Sub-recipients must make reasonable attempts to provide notice to victims affected by the disclosure of the information and take reasonable steps necessary to protect the privacy and safety of the persons affected by the release of the information. This confidentiality provision does not override or repeal existing state law governing the disclosure of information under mandatory reporting statutes (e.g., suspected child abuse or court order).

Sub-recipient confidentiality policies should be abided by when submitting application, budgetary, and program documentation and information to MOVA. Budgets, expenditure reports, backup documentation, etc. should not include client information. View sections on 'Requirement to report actual or imminent breach of personally identifiable information (PII)' and 'Submission of backup documentation' for additional information.

F. Requirement to report actual or imminent breach of personally identifiable information (PII)

Any sub-recipient must have written procedures in place to respond in the event of an actual or imminent "breach" if the sub-recipient 1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "personally identifiable information (PII)" (2 CFR 200.79) within the scope of the funded program or activity, or 2) uses or operates a "Federal information system" (OMB Circular A-130). The recipient's breach procedures must include the requirement to report actual or imminent breach of PII to MOVA immediately after an occurrence of an actual breach, or the detection of an imminent breach. To report a breach, contact your MOVA Program Coordinator.

G. Assistance with victim compensation

Sub-recipients will assist crime victims in seeking and applying for crime victim compensation benefits. Sub-recipients must:

- Maintain a supply of crime victim compensation brochures and applications;
- Establish policies and procedures to identify victims who may be eligible for crime victim compensation benefits; and
- Ensure staff are familiar with the crime victim compensation program, provide assistance to victims in filling out applications, and assist with checking on claim status.

Sub-recipient agencies must meet requirements to assist crime victims in accessing crime victim compensation benefits to the extent that they are able without compromising confidentiality or privacy for the crime victim. Any sub-recipient that cannot assist in completing an application should have an established process to connect a crime victim with a person or organization that can provide this assistance.

Visit the [Victim Compensation and Assistance Division of the Massachusetts Attorney General's Office's website](#) for more information and resources.

H. Provide services to victims of federal crimes

Sub-recipients may not exclude someone from services because the crime occurred in a federal jurisdiction such as a national park, Indian reservation, or a military base.

I. Attend a Grants Policies and Procedures Training

Programmatic and fiscal representatives of each sub-recipient program must attend a Grants Policies and 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 and technical assistance may be available for new staff and those who wish to have additional training. MOVA reserves the right to require attendance.

J. Maintain an active Unique Entity Identifier (UEI) registration

Sub-recipients must maintain an active Unique Entity Identifier (UEI) from the time of application to the end of the performance period. Registrations must be renewed annually. The new UEI is now the primary means of identifying entities registered for federal awards government-wide in [the System for Award Management \(SAM\)](#). If your entity is already registered in SAM, it has been assigned a UEI. To view your UEI, the Federal Service Desk has posted instructions for finding the UEI in SAM.

K. Avoid conflicts of interest

Sub-recipients must comply with federal and state rules which prohibit the use of public funds for personal gain. Sub-recipients must avoid any actions which might result in, or create the appearance of, using public funds or publicly funded positions for private gain, for giving preferential treatment to any person, or adversely affecting the confidence of the public in the integrity of the government or the sub-recipient program.

L. Notify MOVA of Programmatic Changes

Sub-recipients are required to submit a programmatic change form when there is a change to the staffing of their MOVA-funded program (resignation, hire, medical leave, change in hours, etc.). All changes must be reported to MOVA within two weeks of the time the sub-recipient/program director is notified of the change. Submission beyond two weeks may impact reimbursement, subject to MOVA approval. Programmatic change forms must be signed by both the sub-recipient program contact and a fiscal representative and include a narrative.

MOVA must be notified via submission of a programmatic change form if the Executive Director, Program, or Fiscal Contact change to ensure contact information is updated, regardless of if they are on the approved budget.

Additionally, all changes which affect service delivery or scope must be requested in writing to MOVA prior to the change. Without prior approval, reimbursements for changes submitted may be denied.

M. Funding Source Attribution Statements

All materials publicizing or resulting from grant activities produced by a sub-recipient (e.g., publications, flyers, pamphlets, advertisements, press releases, and notifications) must contain an acknowledgment of grantor assistance and indicate that the funded services are provided for free. Reference your award notification for funding sources to reference in your attribution statement(s). Attribution statements may be combined if multiple funding sources are utilized and translated into additional languages.

Attribution statement examples:

- *This project was (partially) supported by the Massachusetts Office for Victim Assistance through a Victims of Crime Act of 1984 (VOCA) grant from the Office for Victims of Crime, Office of Justice Programs, U.S. Department of Justice.*
- *This project was (partially) supported by the Massachusetts Office for Victim Assistance through American Rescue Plan (ARPA) funds from the Commonwealth of Massachusetts Coronavirus State Recovery Funds.*
- *This project was (partially) supported by the Massachusetts Office for Victim Assistance through SAFEPLAN funds from the Commonwealth of Massachusetts.*

N. Debarment, Suspension, Ineligibility and Voluntary Exclusion

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

O. Employment Laws

Sub-recipient agencies must abide by all applicable state and federal employment laws. Sub-recipient agencies will be required to certify compliance with all applicable state and federal employment laws as requested by MOVA.

P. Determination of Suitability to Interact with Participating Minors

If the purpose of some or all of the activities to be carried out under the award is to benefit individuals under 18 years of age, the sub-recipient agency, and any subgrantees, must make determinations of suitability before certain individuals may interact with any participating minors. It is the responsibility of the sub-recipient agency to review the full details of this award condition which can be found on [OJP's website](#).

In order to meet this requirement, sub-recipient agencies must:

- Establish written policies and/or procedures that ensure determination of suitability to interact with minors is assessed in accordance with the terms of the award condition for any covered individual
- Assess suitability to interact with minors for all covered individuals and create written determination of the individual's suitability to interact with minors in accordance with the terms of the award condition
- Document that the required public sex offender and child abuse websites/registries are checked for all covered individuals, including the national registry and registries in all jurisdictions where the covered individual has lived, worked, or gone to school in the last five years, or is expected to interact with minors during the course of employment
- Document that the required background checks are completed for all covered individuals in all jurisdictions where the covered individual has lived, worked, or gone to school in the last five years, or is expected to interact with minors during the course of employment
- Document that the written determination of suitability is reviewed and updated at least every five years

Additional guidance on how to meet the requirements of this Federal Special Condition and how MOVA will monitor compliance can be found on [MOVA's website](#). This document should be reviewed by all sub-recipient agencies to ensure compliance with this special condition.

Q. Employment Eligibility Verification

Sub-recipient agencies must ensure that the hiring process for any position funded in whole or in part with award funds includes verification of employment eligibility. It is the responsibility of the sub-recipient agency to review the full details of this award condition which can be found on [OJP's website](#).

In order to meet this requirement, sub-recipient agencies must:

- Establish written policies and/or procedures that ensure the hiring process for any position funded in whole or in part by award funds verifies employment eligibility consistent with the provisions of 8 U.S.C, 1324a(a)(1) and (2)
- Check employment eligibility as part of hiring for all positions funded in whole or in part by award funds
- Maintain records of all employment eligibility verifications relevant to the award and in accordance with I-9 retention requirements
- Notify all persons involved in activities under the award of this special condition and the employment eligibility provisions of 8 U.S.C. 1324(a)(1) and (2) and provide any training necessary

Additional guidance on how to meet the requirements of this Federal Special Condition and how MOVA will monitor compliance can be found on [MOVA's website](#). This document should be reviewed by all sub-recipient agencies to ensure compliance with this special condition.

IV. Compliance with MOVA in Monitoring the Award

A. Overview

MOVA performs regular monitoring of all administered awards to ensure compliance with these policies and procedures, and all applicable state and federal rules and regulations. Monitoring is an ongoing process that occurs throughout the award timeframe in the day-to-day activities of grant management and through desk reviews and site visits by MOVA staff and/or staff from state or federal agencies as required by state and federal rules and regulations. Findings of non-compliance with any of the policies and procedures described within this document and/or applicable state and federal rules and regulations may be issued by MOVA at any time. Limited action to improve compliance may result in the loss of funding and impact future funding recommendations.

Monitoring topics may include, but are not limited to:

- adherence to MOVA policies and procedures,
- compliance with all applicable state and federal rules, regulations, and award conditions,
- compliance with federal special conditions, when applicable
- adherence to conditions set forth in the grant agreement,
- progress towards program objectives, as outlined in the approved program proposal, and the provision of services to victims or crime,
- progress towards measuring goals and outcome measures as included in the Outcome Measurement Tool,
- timeliness and accuracy of submissions of performance reports and expenditure reports,
- fulfillment of plan to liquidate funds according to approved budget,
- financial administration and management of award funds,
- compliance with state and federal civil rights requirements,
- retention of award documents and records,
- overall administration of the award and grant performance.

B. Risk Assessment

MOVA performs a post-award risk assessment to assess the risk of the sub-recipient awards and to determine the appropriate priority and level of monitoring for each sub-recipient award. MOVA reserves the right to perform additional risk assessments, or adjust the annual risk assessment, when necessary to re-evaluate risk. The risk assessment includes an evaluation of sub-recipient programmatic, administrative, and fiscal compliance with award terms and conditions, review of the sub-recipient organizational questionnaire submitted at time of application and/or contracting, and additional criteria developed by MOVA and adjusted as needed to determine the risk level of each MOVA-administered contract.

MOVA's sub-recipient risk assessment is broadly based on the following categories. These categories are subject to change and adjustment as needed.

- Organizational questionnaire
 - E.g., responses to questionnaire administered at time of contracting
- Total award amount
 - E.g., total dollar amount of all awards to the sub-recipient agency
- Timeliness and accuracy of reports
 - E.g., accuracy and timelines of performance reports and expenditure reports
- Adherence to budget
 - E.g., liquidation of award amount, spending in line with program scope and budget

- History of award administration
 - E.g., performance during previous monitoring activities such as site visits and desk reviews
- Overall performance indicators
 - E.g., general award administration and performance, responsiveness to requests from MOVA, compliance with policies and procedures

Based on the results of the risk assessment, all sub-recipient awards are assigned a monitoring level, categorized as Level 1, Level 2, or Level 3. New sub-recipients and/or sub-recipient awards will be categorized separately as new for the first year of performance and in following years will be incorporated into the standard risk assessment process. Sub-recipient awards will be considered as new if the agency has never received funding administered by MOVA or does not have a recent award history with MOVA of a comparable scope. The monitoring level assigned to each sub-recipient award guides the intensity and frequency of monitoring performed by MOVA during the award cycle. This includes monitoring activities such as site visits, desk reviews, and backup documentation requirements for expenditure reports. Determination of any additionally necessary monitoring will be made by MOVA staff based on their professional judgement, knowledge of the sub-recipient agency, and any concerns that may arise during the course of an award cycle.

C. Monitoring Activities

Monitoring activities are guided by the risk assessment and assigned monitoring level (Level 1, Level 2, or Level 3). Risk levels, and therefore monitoring activities, may change within award cycles if issues are discovered during an award cycle that impact MOVA's assessment of risk. Failure to comply with MOVA's policies and procedures at any point during an award cycle will immediately impact the frequency and intensity of monitoring activities.

Below is an outline of the standard monitoring activities that take place over the course of an award cycle for each monitoring level. This represents the minimum monitoring activities to be expected. These activities are subject to change at the discretion of MOVA staff and can increase or decrease in intensity and frequency based on the overall performance of an award and/or any administrative, financial, or programmatic concerns that may arise.

- Level 1:
 - No backup documentation is required to be submitted with expenditure reports unless specifically requested by MOVA.
 - A minimum of one expenditure report desk review per fiscal year is conducted to review at least one full month's reimbursements with complete backup documentation.
 - A mid-year review process is conducted only if financial or programmatic concerns arise during the award cycle.
 - A year-end closeout process is conducted at the close of the fiscal year to reconcile spending and any outstanding matters from the award cycle.
 - One complete site visit, including both programmatic and financial monitoring, is conducted a minimum of once every four years. Frequency may vary dependent on scheduling needs.
 - Technical assistance is provided as needed.
- Level 2:
 - No backup documentation is required to be submitted with expenditure reports unless specifically requested by MOVA.

- A minimum of one expenditure report desk review per fiscal year is conducted to review at least two full month's reimbursements with complete backup documentation.
 - A mid-year review process is conducted only if financial or programmatic concerns arise during the award cycle.
 - A year-end closeout process is conducted at the close of the fiscal year to reconcile spending and any outstanding matters from the award cycle.
 - One complete site visit, including both programmatic and financial monitoring, is conducted a minimum of every three years. Frequency may vary dependent on scheduling needs.
 - Technical assistance is provided as needed.
- Level 3:
 - Complete backup documentation is required to be submitted for all expenses included in expenditure reports. After the completion of two quarters of expenditure reports, dependent on expenditure report performance, MOVA may inform sub-recipient agencies that back-up documentation can be reduced for the remainder of the fiscal year.
 - Expenditure report desk reviews may be requested by MOVA if expenditure report back-up documentation is reduced.
 - A mid-year review process is conducted to review performance with any financial, administrative, or programmatic areas of concern and provide technical assistance.
 - A year-end closeout process is conducted at the close of the fiscal year to reconcile spending and any outstanding matters from the award cycle.
 - One complete site visit, including both programmatic and financial monitoring, is conducted a minimum of every two years. Frequency may vary dependent on scheduling needs.
 - Ongoing technical assistance is provided over the course of the award cycle.
- New Sub-Recipient Awards:
 - Complete backup documentation is required to be submitted for all expenses included in expenditure reports. After the completion of two quarters of expenditure reports, dependent on expenditure report performance, MOVA may inform sub-recipient agencies that backup documentation can be reduced for the remainder of the fiscal year
 - Expenditure report desk reviews may be requested by MOVA if expenditure report back-up documentation is reduced
 - Year-end closeout process is conducted at the close of the fiscal year to reconcile spending and any outstanding matters
 - One complete site visit, including both programmatic and financial monitoring, is conducted during the first year of the award and, following the first year, will be conducted in accordance with the requirements of the assigned monitoring level
 - Ongoing technical assistance is provided throughout first year, formal technical assistance visits are scheduled on an as needed basis

*It is the responsibility of the sub-recipient agency to request for reimbursement only those expenses that are included in the approved budget and only expenses that have been incurred by the agency. It is also the responsibility of the sub-recipient agency to retain backup documentation to support all costs requested for reimbursement against a contract or ISA, including match expenses, and to be able to provide such documentation to MOVA upon request. **MOVA reserves the right to request the return of any funds without adequate associated backup documentation.** See Backup Documentation, under section VIII. Reporting Requirements, for more information.*

D. Site visits & Desk Reviews

MOVA conducts site visits with sub-recipients throughout the course of contracts to ensure compliance with these policies and procedures, and all applicable state and federal rules and regulations. Technical assistance with requirements is also provided as needed. Administrative, financial, and programmatic compliance, as well as overall grant performance is assessed during the site visit; through the submission of pre-visit worksheets, the site visit itself, and via follow-up after the site visit. At a minimum, program expenditures, required policies and procedures, compliance with award conditions, civil rights requirements, and financial and programmatic grant progress are reviewed. A report is issued after site visits to outline administrative, financial, and programmatic areas reviewed and any identified findings. When applicable, sub-recipients are required to address all site visit report findings through requested corrective actions by a deadline set forth by MOVA. Failure to address corrective actions by the deadline set forth by MOVA is recorded in the sub-recipient's grant history and may result in the loss of funding and/or impact future funding decisions.

Desk reviews are conducted by MOVA throughout the award cycle in order to monitor financial records and program spending. When a desk review is initiated, sub-recipients receive a request for specific information to be submitted to MOVA. Most often the request is for the submission of all supportive backup documentation of expenses billed to the award over a specified time period. The submitted information is reviewed by MOVA and any concerns or questions are communicated to the sub-recipient agency. When applicable, any findings of non-compliance with award requirements are documented and resolution of findings is required. While desk reviews are most commonly initiated to review documentation of expenditures, they may also be initiated by MOVA due to a specific programmatic, administrative or financial concern.

E. Access to documents

Sub-recipients must permit access, in accordance with applicable laws, to all documents, papers, letters, or other materials made or received by the provider in conjunction with the sub-recipient program. This provision does not apply to confidential victim records.

F. Retention of award 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. This includes all backup documentation to support expenditures made under the award.

V. Fiscal Policies & Procedures

A. Purpose of Fiscal Policies & Procedures

Fiscal Policies & Procedures serves as a primary reference manual to assist sub-recipients in fulfilling their fiduciary responsibility to safeguard grant funds and ensure funds are used for the purposes for which they were awarded.

The Fiscal Policies & Procedures are subject to change as new laws are passed or updates are made to Federal and State rules and regulations. 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.

B. Responsibility of all Sub-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, visit the [Office of Justice Programs \(OJP\)](#) web site as well as [the Office of Management and Budget's \(OMB\)](#) web site to obtain copies of current circulars.
- OCFO Guidelines, Effective Edition

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. All allocation methods used to determine reimbursement or matching contribution expenditures must be in compliance with accounting procedures specified in:

- OMB Circular A-122 (for non-profit agencies); or,
- OMB Circular A-87 (for local government agencies)

Sub-recipients must be able to separate financial activity related to their MOVA-administered award from other revenue streams and expenses and must be able to separate their MOVA funding by program/award if more than one award is received from MOVA. Sub-recipients must be able to separate all MOVA revenue and expenditures within their accounting system and track their costs for the related fiscal year. If multiple streams of funding are used to support the award administered by MOVA, revenue must be tracked accurately for each funding stream.

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 state and federal laws, rules and regulations.

C. Matching Requirements

Following the passage of the [VOCA Fix to Sustain the Crime Victims Fund Act of 2021](#), signed by Congress on July 22, 2021, MOVA issued automatic match waivers for all sub-recipient programs. At the time of the current update to the MOVA Grant Sub-recipient Policies & Procedures (July 2023), match waivers will continue to be automatically granted for all sub-recipient awards unless otherwise stated by MOVA.

When applications for grant funding are available, the Request for Grant Application (RGA) will include specific requirements regarding matching contributions. When required, VOCA regulations require sub-recipients to contribute to the total cost of their MOVA funded project by providing not less than 20% of the total project cost (25% match of the total subaward funds), either cash or in-kind, from non-federal sources. For

consistency, MOVA applies these regulations to all funding sources.

Documentation must be maintained that the matching funds are not federal funds. State agencies may not use non-program related expenses or indirect chargeback as matching sources due to MMARS (Massachusetts Management, Accounting, and Reporting System) and Comptroller policy.

MOVA may also initiate match waivers in certain circumstances. See Match Waivers in section V. Fiscal Policies & Procedures for more information. When a match waiver is not automatically issued by MOVA, requests to waive the match requirement will be considered on a case-by-case basis.

Requirements:

- Sub-recipients must match grant contributions on a 75/25 cash or in-kind basis unless a match waiver has been granted.
- All funds designated as match are restricted to the same requirements as MOVA funds.
- Funds must be obligated and expended during the grant period. Additional requirements may be laid out within a respective RGA and will be tailored to the approved project.
- All in-kind services involving personnel used as match must be accounted for in the same manner as funded personnel.
- Material contributions (furniture, equipment, supplies, etc.) used as match must be counted as match during the grant period in which they are received by the sub-recipient on a cash accounting basis. Material contributions may not be used as match on a depreciation or accrual basis.
- Volunteers and interns may be used as an in-kind match at a rate of up to \$18 an hour. Fringe costs should not be allocated for volunteers and used as match.
- The value of donated services by professionals may be used to comply with the match requirement provided the service is MOVA allowable and documentation is provided by the donor that offers a fair and reasonable value to the service.
- Records must be maintained which clearly show the source and the amount of matching contributions (cash and in-kind) committed to the funded program.

D. Match waivers

Unless automatically waived, MOVA will consider all match waiver requests from sub-recipients during application and contracting periods. Match waiver requests can also be made outside of the application and contracting period on an as needed basis.

MOVA may initiate match waivers either on an individual project, multi-project, or a blanket basis for sub-recipients when there is a direct impact on services provided to victims of crime. MOVA initiated match waivers and sub-recipient waiver requests are only to be used when unique circumstances exist.

Circumstances that may apply include, but are not limited to:

- Natural Disasters
- Pandemics or other geographic health crisis
- Mass violence/victimization events
- Other circumstances as determined by MOVA

Partial match waiver requests will be considered by MOVA. Prior MOVA approval will be required for any match waiver requested by a sub-recipient outside of the performance period.

E. 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, time and attendance records specifying time devoted to allowable victim services, victim 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. Child Accounts (State Agencies) must abide by the [Comptroller's Policy](#) on reporting by utilizing MMARS, Labor Cost Management, and Commonwealth Information Warehouse.

F. Supplanting

Federal funds must not supplant funds that have been budgeted for the same purpose through non-federal sources. Therefore, awarded funds cannot be used to supplant - or replace - existing state or local funds already allocated for the same purpose. Supplanting occurs when a sub-recipient intentionally replaces its other state or local victim service funding sources with federal funding.

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.

To help clarify the difference between supplementing and supplanting, provided is an amended example from the U.S. Department of Justice ([DOJ Grants Financial Guide](#)):

- **Supplementing:** State funds are appropriated to hire 5 new forensic interviewers, and Federal funds are awarded to hire 6 new forensic interviewers. At the end of the year, the agency has hired 5 new forensic interviewers with State funds and 6 new forensic interviewers with Federal funds. Under this scenario, there is no supplanting violation because the agency used the Federal funds to supplement (rather than to supplant) the hiring of the new forensic interviewers.
- **Supplanting:** State funds are appropriated to hire 5 new forensic interviewers, and Federal funds are awarded to hire 6 new forensic interviewers. At the end of the year, the agency has hired 6 new forensic interviewers with Federal funds and none with State funds. Under this scenario, it may be considered a supplanting violation because the agency used the Federal funds to supplant (rather than to supplement) the hiring of new forensic interviewers.

G. Independent Audits

Sub-recipients must comply with all OMB, OCFO, and Commonwealth of Massachusetts policies regarding audit thresholds. Financial audits for sub-recipients that do not meet prescribed expenditure thresholds are strongly encouraged. Pro-rated audit costs for sub-recipients that meet the prescribed federal audit expenditure thresholds (2 C.F.R. Part 200 Subpart F) may be charged to the grant based on the ratio of all Federal grants being audited. While financial audits for sub-recipients that do not meet the prescribed federal audit thresholds are encouraged, such audit costs may not be charged to the grant.

H. Budgeting

Budgets, unless otherwise indicated, are to be detailed by fiscal year in conjunction with the state fiscal year (July – June). Unutilized budget funds may not carry across fiscal years unless approved by MOVA. Sub-recipients may not obligate funds, make purchases, or enter into contracts prior to the start of the subaward period. No additional financial obligations can be incurred after the end of the period of performance. For example, if the period of performance is July 1, 2022, to June 30, 2023, the financial obligation deadline is June 30, 2023.

I. Cost reimbursement

MOVA administers funding on a reimbursement basis, meaning that funds are paid to sub-recipient agencies after expenditures have been incurred. Reimbursements will be made only for expenses included in the approved sub-recipient program budget. Expenditures should be reported for actual approved and incurred expenses. Expenditures should be reported in the month in which the expenses were incurred. It is the responsibility of the sub-recipient agency to ensure that all costs requested for reimbursement have been incurred by the agency, are included within the agency's approved budget, and are allowable costs. Backup documentation for all expenditures must also be maintained. MOVA reserves the right to request funds to be returned if discovered that reimbursement was made for costs not within the approved budget, unallowable costs, overpayment, audit disallowances, or any other breach of subaward agreement that results in a debt owed to the federal government.

Please see C. Expenditure Report Policies, under section VIII. Reporting Requirements, for further information regarding expenditure reports.

J. Cash on Hand

Organizations should request funds on a quarterly or monthly basis based upon immediate disbursement/reimbursement requirements. Funds will not be paid in a lump sum, but rather disbursed over time as project costs are incurred.

Draw down requests should be timed to ensure that Federal cash on hand is the minimum needed for disbursements/reimbursements to be made immediately or within 10 days. If not spent or disbursed within 10 days of receipt, MOVA reserves the right to request funds to be returned.

K. Program income and free services

Generating sub-recipient income on funded personnel time is unallowable. All funded services are to be provided free of charge and at no cost to the victim. Client income or financial resources may not be considered when determining eligibility for services.

Please contact MOVA with any questions regarding program income allowability.

L. Uniform Financial Report (UFR) Commonwealth Vendors

If required by 808 CMR 1.00 sub-recipients must file properly prepared Uniform Financial Statements and Independent Auditor's Report (UFR) or a UFR cover page and Exceptions/Exemption documentation, or an alternate report as directed by the Operational Services Division (OSD) <http://www.mass.gov/UFR>.

VI. State Agencies (ISA) Financial Policies

A. Use of correct MMARS Expenditure Classification

Upon receipt of a signed copy of the ISA from the Seller/Parent Department, the Buyer/Child Department must take the necessary steps to notify the Budget, Accounts Payable, and Payroll staff of the appropriate coding information. All federal grant activity must be properly coded to the grant budget line along with the object classes specified in Attachment B of the ISA and in accordance with the approved grant budget. For additional guidance on the use of the object classes and how it correlates with the approved budget, review the [Comptroller's Expenditure Classification Handbook](#).

B. Federal Audit Protocol

All state agencies must adhere to the [Comptroller's Policy](#) when notified by federal authorities to perform an audit. Federal regulations, OMB Circular A-133, state that federal auditors must build upon any work already done in the Statewide Single Audit.

C. Budget transfers

No PRADJ, EXs, or any other adjustment entries should be done across fiscal years or federal grant awards without prior approval from MOVA. E-mail the assigned program coordinator if any adjustments are required. Child accounts may submit an updated Attachment B to their respective program coordinator for review and approval.

ISA's must ensure they are spending the correct program award that was obligated to them. ISA's can review the Attachment C(s) to determine what funding source they were awarded from and the duration of the award. ISA's that have access to the Massachusetts Management Accounting Reporting System can review their awarded federal program budget with the BQ88 table in MMARS, and their yearly federal budget, which is a cumulative amount of the MOVA programs under appropriation 08400110, in the BQ89 table.

D. Expenditure Reports State Agencies (ISA)

This is a cost reimbursement grant. Only costs included in the approved sub-recipient program budget should be charged to the program code. Sub-recipients state agencies must submit expense reports monthly.

VII. Cost Categories

A. Personnel - Salary

The employees of sub-recipients shall receive a salary 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 federal Rules, state and federal labor laws.

STATE AGENCIES: Pursuant to [M.G.L c.29 § 31](#), unless otherwise provided by law the Comptroller requires a certification from each spending authority that each employee receiving a salary under the warrant is being paid for duties performed directly for the employing department and not for duties performed for another state department.

If a sub-recipient budgets for a specific salary or salary increase, it must pay the funded employee that amount. Any changes to salary should be proposed in a budget amendment and requires MOVA approval. Sub-recipients may use 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 funds. It is required to maintain the number of contracted hours as reflected on the approved budget. Sub-recipients may not increase staffing levels paid through the MOVA grant without prior written approval from MOVA. Sub-recipients must retain job descriptions for MOVA funded employees. For additional information on changes to staffing levels, see the [Budget Amendment](#) section.

B. 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 approved 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 administrative 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 sub-recipient 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.

STATE AGENCIES: Personnel working for Sub-recipient/Child Account should be hired into the ISA child account or rules should be established in the state payroll system to point a portion of the payroll charges to the child account in accordance with ISA procedures. All State employees are to be paid with the AA Expenditure Object class.

Payroll Records

- 1) Each person funded through the grant (including volunteers/interns) must accurately account for their time spent working on the program. Payroll records should reflect either after the fact **distribution** of actual activities, or **certifications** of employee's actual work performed. Any payroll records must clearly state the funding source utilized to support the employees time or be easily identified by cost center or code that references the funding source.

- a) **For distribution of actual activities** for any non-full time or salaried employees, payroll records should reflect time distribution. These records should be reviewed and signed by the supervisor and employee no less than every six months, comply with, and meet the standard outlined in (b) of this section regarding identification of funding source.
 - b) **For certifications of actual work performed** paper or electronic timesheets, time and effort reports, or activity reports must be certified by the employee and approved by a supervisor with firsthand knowledge of the work performed. The time certifications must match the payroll records.
- 2) An electronic system is an acceptable method of tracking the time of the grant funded and/or matched employee in lieu of paper timesheets. The sub-recipient must have a written policy establishing the use of electronic timekeeping and the system should include a secure electronic signature and approval system. The system must be able to delineate MOVA funded time.
 - 3) MOVA recommends that all sub-recipients follow Generally Accepted Accounting Principles (GAAP), and as required by funding level, comply with federal and state audit standards.

STATE AGENCIES: Sub-recipient/Child Account budget lines, in all account types, that include compensation to regular employees (object class AA) supported by the ISA, must also include DD (D09) object class. This is necessary to cover mandated chargebacks for employee pension, health insurance and terminal leave expenses from federal grants, expendable trusts, capital accounts and all other non-budgetary accounts to centralized state administrative accounts. Also, this is necessary to cover the cost of Unemployment Compensation Insurance Premium (UI), Universal Health Insurance (UHI) contribution, and the employer share Medicare Tax (MTX).

Expenditures in a Sub-recipient/Child Account may trigger indirect costs. Both the MOVA/Parent and Sub-recipient/Child Account department are responsible for negotiating the type of expenditures authorized under an ISA and determining if the expenditures will trigger the assessment of indirect costs. These costs must be included as part of the ISA and funded as part of the ISA budget. Departments requiring information on whether expenditures will trigger an indirect cost assessment should contact the Federal Grants and Cost/Allocation Unit at the Comptroller's Office. Sub-recipient/Child Account's must provide MOVA/Parent with a letter from the Comptroller's Office.

Leave

Expenditures in the form of regular compensation paid to employees during periods of authorized absences from the job are allowable, provided such costs are in compliance with state and federal regulations, agency policy, and absorbed by all organization activities in proportion to the relative amount of time or effort devoted to each. Examples of leave include but are not limited to vacation, sick (including regular and extended sick leave), and parental leave. Reimbursement must be within the maximum obligation of the grant.

C. Consultants

For the purposes of this grant program, a consultant is an individual who provides specialized services for clients not otherwise available within the funded program/project. Consultants and independent contractors are considered as self-employed and receive a 1099 from the sub-recipient for whom they are providing services, in accordance with the US tax law.

Limited use of consultants to provide direct services within the scope of the grant is allowable. When consultants are included in the budget and/or scope of services, a contract between the sub-recipient and consultant that states the name, title, and contact information of the consultant, the service to be provided, and the agreed upon rate of pay for services must be provided to MOVA. For consultant contracts exceeding a total of \$10,000 and above, a Sub-Contract Request Form must be submitted to MOVA. The sub-recipient

must use its own documented procurement procedures consistent with applicable federal and state laws and regulations. Procurement procedures must be formally documented by the subrecipient and periodically reviewed to ensure compliance with applicable regulations.

The Procurement Standards in the Uniform Guidance at 2 C.F.R. § 200.317 through 2 C.F.R. § 200.326, detail the requirements and restrictions imposed on subrecipients that use federal assistance funds to procure property or services needed to carry out the grant funded project. Additionally, sub-recipients must follow the procurement requirements in M.G.L. c. 7, s. 22 and the standards in 801 CMR 21.00 with limited exceptions. The sub-recipient is responsible for conveying MOVA Policies and Procedures to any consultant.

If the consultant is not hired at the time of award, funds may be approved; however, the consultant contract and sub-contract request form (if applicable) must be provided to and approved by MOVA before services are rendered.

Compensation for individual consultant services is to be reasonable and consistent with that paid for similar services in the marketplace. Compensation is limited to \$650 for an 8-hour day, or \$81.25 per hour (excluding travel and subsistence costs). Rates must be reasonable and consistent with marketplace rates in accordance with OMB cost principles. This documentation must be maintained on file. Sub-recipients requesting to pay a higher hourly rate for contracted services must submit Request to Exceed Maximum Consultant Rate to their Program Coordinator for prior approval. No work at the higher rate may begin prior to MOVA approval.

Employee vs. Consultant

A person who performs services for a sub-recipient is an employee if the sub-recipient controls what will be done and how it will be done. The general rule is that an individual is a consultant if the sub-recipient, as the entity for whom the services are performed, has the right to control or direct only the result of the work, and not the means and methods of accomplishing the result. An employee who receives a W-2 form from the sub-recipient cannot be budgeted with MOVA funds as a consultant, as only individuals or entities with no employee relationship to the sub-recipient may be budgeted thusly.

D. Office and Programmatic Supplies

Office and programmatic supplies necessary to support the operation of the funded services and activities for victims of crime are allowable provided they are included in the approved budget. Common costs that fall into this category are office supplies for the funded program (paper, printing, postage, etc.) and necessary materials for the provision of services (support group supplies, materials for therapeutic and/or support and/or advocacy services, etc.)

STATE AGENCIES: Use of Commonwealth of Massachusetts State Contracts and Solicitations. State Agencies must utilize the best cost saving methods when purchasing goods and supplies under their grant funded program in accordance with OSD guidance in the [Procurement Information Center](#).

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, visit the Commonwealth's [Operations Service Division's](#) website.

E. Equipment

Equipment policy

Equipment purchased with MOVA funds must be used only for the purposes of the grant program. Sub-recipients are expected to maintain internal controls on equipment based on acceptable accounting principles identified in the DOJ Grants Financial Guide.

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 standards until disposition takes place. For the purpose of inventory, equipment will be defined as outlined by the DOJ Grants Financial Guide: "tangible personal property having 1) a useful life of more than one year and 2) a per-unit acquisition cost of \$5,000 or greater (or the organization's capitalization policy, if it is less than \$5,000)." If the organization does not have a capitalization policy in place, the Federal policy amount of \$5,000 must be followed.

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 of equipment shall be promptly and properly investigated by the recipient and sub-recipient and reported to MOVA.

Depreciation on purchased item(s)

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 sub-recipient. Useful life periods used for grant equipment must be consistent with the useful life periods used for any other non-grant equipment.

F. Travel

General travel policy

Costs incurred for travel are necessary 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. When requesting costs in the travel category, create separate lines for mileage, parking, and tolls.

Direct service employee travel

Sub-recipients may be reimbursed for mileage, tolls, and parking expenses related to travel that a grant-funded employee makes to serve victims and costs incurred by funded employees who are traveling on official business to attend meetings or trainings related to the funded program.

Victim Travel Expenses

Reasonable costs for transporting victims to receive services are also reimbursable to programs.

Mileage rate policy

Mileage reimbursement will be made at the sub-recipient rate, not to exceed the current effective federal 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, the sub-recipient must follow the established federal travel policy regarding mileage reimbursement. Amendments must be made if the federal travel rate changes throughout the course of the grant period.

Out of state travel, training, and travel for training

Reimbursement for out-of-state travel expenses by sub-recipients requires prior approval from MOVA. Funds should be requested at the time of application, with as much information provided at that time as possible. Training related travel may be covered such as transportation, meals, lodging and registration fees to attend training. Travel expenses will be reimbursed according to the pre-approved budget and are not to exceed a sub-recipient travel policy.

Sub-recipients are encouraged to look first for available training within their immediate geographical area to minimize travel costs. If needed training is unavailable close by, funds may be authorized for out of state travel. The travel must be:

- Necessary to assist in the completion of the sub-recipient program goals and objectives;
- Specific to the purpose of the sub-recipient program;
- Appropriate to the position and responsibility of the individual or individuals traveling; and
- Of direct benefit to the sub-recipient program, with such benefit unavailable through other means.

If a desired training is available outside the Commonwealth, sub-recipients must specifically request to use award funds to support those costs. All out of state travel by plane, train or bus must be approved by MOVA prior to incurring expenses via the out of state travel and training form.

G. Contracts

Use of contracts to provide services within the scope of the grant are allowable. Examples include but are not limited to: specialized professional services for victims such as psychological consultation, legal services, and interpreters, or contracted bookkeeping/accounting services.

If costs associated with a subcontract are requested, a contract between the sub-recipient and sub-contractor that states the name, title, and contact information of the sub-contractor, the service to be provided, and the agreed upon rate of pay for services must be provided to MOVA, along with a completed subcontract request and certification form.

The contract must be signed by both entities and certify in the contract that the sub-contractor has received a copy of the MOVA Policies and Procedures manual, and the work done will be in compliance with the source grant and all subsequent conditions. If the contract is not in effect at time of application, funds may be approved; however, the contract must be provided to MOVA before services are rendered.

For sub-contracts below \$10,000 over the course of the award cycle, a contract and Sub-Contract Request Form are not required and only an invoice is required for reimbursement of these costs.

MOVA retains control and authority to approve, deny, terminate, or suspend any sub-contract between MOVA and a sub-recipient. This includes withholding payment for any unauthorized contractor or sub-contractor.

Procurement of Good and Services

For procurement transactions using award funds, the sub-recipient must use its own documented procurement procedures consistent with applicable federal and state laws and regulations. Procurement procedures must be formally documented by the subrecipient and periodically reviewed to ensure compliance with applicable regulations.

The Procurement Standards in the Uniform Guidance at 2 C.F.R. § 200.317 through 2 C.F.R. § 200.326, detail the requirements and restrictions imposed on subrecipients that use federal assistance funds to procure property or services needed to carry out the grant funded project. Additionally, sub-recipients must follow the procurement requirements in M.G.L. c. 7, s. 22 and the standards in 801 CMR 21.00 with limited exceptions.

H. Other

Costs that fall into this category are those that support the provision of the funded activities and services but are not easily categorized into the other budget sections. Three common “other” costs include food for victims, gift cards, and childcare. The following is provided as additional guidance for these costs.

Food and/or beverages are allowable provided they are for the purpose of enhancing direct services to victims. The cost of the food and/or beverages must be reasonable. **MOVA funding cannot be used to purchase food and/or beverages for any meeting, conference, training, or other event.**

Gift cards may be provided to victims in situations where emergency food, clothing, and/or basic needs are needed to restore the victim’s sense of security in the aftermath of a crime. Any use of gift cards must be accompanied with written agency policies and internal controls regarding the purchase and use of gift cards. Written policies should include information on approval, distribution, tracking, accounting, and distribution methods. Gift cards equate to “cash” which must be handled accordingly as well as being distributed within the respective grant award year (funds may not be retained from year to year).

Childcare to enable a victim to receive services is an allowable cost. Sub-recipients may not directly reimburse victims but can reimburse childcare providers via third-party payment. The childcare provider may directly bill the sub-recipient, who may confirm the victim was receiving services at that time, and issue payment, then include in the appropriate expenditure report for reimbursement.

I. Indirect cost rates

Indirect Costs are costs that are not readily assignable to a project but are necessary to the operation of the organization and the performance of the project. Sub-recipients may request indirect costs for the administration of the sub recipient program per the applicable RGA. Costs should appear in the approved budget.

Sub-recipients that have a federal approved or state approved indirect cost rate may utilize their current agreed upon rate to request indirect rate reimbursement. Sub-recipients must provide the appropriate documentation indicating the rate is approved and current. Information on how to request a federally approved indirect rate can be found in the DOJ’s [Indirect Costs Resource Document](#).

If no rate exists, the sub-recipient may request a 10% de minimis rate. As the cognizant agency for de minimis rates, MOVA subscribes to the regulations defined in the Code of Federal Regulations (annual edition) Title 2

CFR 200.414 (f), including adherence to the utilization of [Modified Total Direct Costs](#) (MTDC) to determine the base for indirect calculations. MTDC includes:

- All salary and wages
- Most fringe, with the exception of tuition remission, scholarships, and fellowships
- Consultants up to \$25,000 per line item for total award period
- Office/Admin with the exception of any supplies/supports for clients
- Equipment under \$5,000 per item
- Travel for staff. Any travel for clients cannot be included
- Contracts up to \$25,000 per line item for total award period
- “Other” expenses excluding rent, anything in the rental agreement (utilities, taxes, etc.), and any client expenses or supports

Other expenses that are not included in MTDC for the indirect base calculation include but are not limited to capital expenditures such as land or building renovations.

MTDC includes both direct and administrative expenses (defined in [Appendix D](#)) and does not include any matched expenses. Once the indirect base has been calculated utilizing the instructions above, the approved budget must request the entire 10% indirect allocation, which can be split between VOCA reimbursement and match or solely allocated to either.

Sub-recipients may also negotiate an indirect cost rate with MOVA. Contact the MOVA Program Coordinator for more information.

J. Budget Amendments

Sub-recipients may request a budget amendment to reallocate funds at any point during the fiscal year. The original award amount will not be increased by this procedure unless there has been approval by the VWAB to do so.

Provided are examples of when a budget amendment request is required:

- Redirection of funds in or out of a cost category*;
- Any proposed changes affecting the level of direct service hours and/or the scope of the project.
Examples include:
 - 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
 - Increasing or decreasing direct service and or personnel hours
- Any changes that remove 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

*Cost category is defined as being either Salary, Fringe, Consultants, Office & Programmatic Supplies, Equipment, Travel, Contracts, Other Costs, or Indirect Costs and the individual budget line items contained within.

All budget amendment requests must be submitted via eGrants and will require MOVA approval. All budget

amendment requests must be received before a subsequent expenditure report is submitted. This request must include:

- Budget amendment submitted via eGrants;
- A narrative describing the reason for the amendment request and the changes proposed;
- A programmatic change form, with required staff information, if changes impacting personnel are proposed.

Upon approval from MOVA, sub-recipients can shift up to 10% per year of the funding of the total program budget. The 10% includes shifts between all cost categories. MOVA may approve budget amendments exceeding 10% on a case-by-case basis. Reimbursements can be held if information is not submitted correctly. MOVA reserves the right to limit the number of budget amendments sub-recipients may submit throughout the contract cycle. If approved, the sub-recipient will be notified of the approval via a system notification in eGrants.

VIII. Reporting Requirements

MOVA reserves the right to revise scheduled dates and processes for reporting requirements, including expenditure reports and performance reports. Any changes will be posted on MOVA's website and sub-recipients will be notified via the Constant Contact e-mail list. For new sub-recipient agencies, MOVA reserves the right to waive or revise reporting requirements during the initial contract cycle.

Questions regarding any of the reporting requirements outlined in this section should be directed to MOVA by contacting the sub-recipient agency's MOVA Program Coordinator.

A. Submit a Subgrant Award Report (SAR)

The SAR is to be completed upon the start of the award to specify the purpose and intention of the award. Subgrantees will complete within 30 days of the beginning of their award and may be required to update it throughout the award cycle to reflect any changes. MOVA will provide guidance when it becomes available following contracting.

B. Satisfactory and timely completion of quarterly performance reports

All sub-recipients are required to report performance data to MOVA via the Outcome Measurement Tool (OMT). Data reported should represent services provided only by grant funded staff and any staff (paid or unpaid staff or volunteers) used as match. Similarly, performance data should only include information on clients/program beneficiaries who are served by grant funded staff and any staff (paid or unpaid staff or volunteers) used as match. Data on services provided by other staff should not be included. MOVA will provide instruction to sub-recipients at the time of the award, and as needed.

Data must be submitted as instructed according to the following dates:

Reporting Period	Due Date	Notes
July 1 through September 30	October 31	Sub-recipients are to complete "annual" questions
October 1 through December 31	January 31	All clients reported as "new"
January 1 through March 31	April 30	
April 1 through June 30	July 31	

C. Expenditure Reports Policies

Reimbursement and Reporting

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

Budgets are submitted to MOVA during the application process and reviewed by MOVA. Budgets should not be considered finalized and sub-recipients should not commit funds until a contract with MOVA is executed. Budget amendments must meet the criteria identified within the Policies and Procedures.

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 within current fiscal year approved funding request.

Reimbursements will be made only for expenses included in the approved sub-recipient budget. Expenditures should be reported for actual approved and incurred expenses. It is the responsibility of the sub-recipient

agency to ensure that all costs requested for reimbursement have been incurred by the agency, are included within the agency's approved budget, and are allowable costs. Backup documentation for all expenditures must also be maintained.

Sub-recipients must submit expenditure reports on a monthly basis, due by the 30th day of the month following the close of the expenditure reporting period or on the next business day if the 30th falls on a holiday or weekend. For example, the final day to submit a July expenditure report is August 30th. On a case-by-case basis and at MOVA's discretion, MOVA may allow multiple expenditure reports to be submitted for reimbursement each month. The purpose of this is to support cash-flow to newly funded organizations operating on a cost reimbursement basis. Contact your MOVA Program Coordinator with questions.

Expenditure reports will not be considered received and eligible for reimbursement until they are submitted accurately and with all necessary accompanying documentation. Reimbursements will then be processed within 45 days according to the Commonwealth's payment policy. See section on Commonwealth Payment Policy below for more information. If the 45-day payment processing timeline presents a challenge, sub-recipient agencies should contact their grant manager.

STATE AGENCIES: Agencies must use the proper federal grant program code when drawing down from the funds off of MMARS. This information is located in Section C of the ISA. Costs must be incurred within the specified grant period and must correlate with the current fiscal year approved budget.

Commonwealth Payment Policy

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

Grant Closeout

Final reimbursements for the state fiscal year, or for the close of a contract, are to be inclusive of the final month of the respective contract/ISA for services up to and including those provided on the final day of the contract/ISA. Supplemental billing is not allowable. Unless otherwise indicated, final expenditure reports for the close of the state fiscal year (July – June) will be due no more than 40 days following the last day of the state fiscal year.

STATE AGENCIES - Reconciliation and Reporting Process:

Sub recipient/child must conduct a monthly reconciliation of expenses drawn from the grant using one or more of the following methods:

- Commonwealth Information Warehouse query detailing expenditures, object classes, acceptance date, fiscal year, and program code.
- MMARS Reimbursement Grant Budget Screen (BQ88*)

If a sub-recipient/child finds that the incorrect program code was used in the current fiscal year's spending, corrections must be made before the end of the grant period. Notify MOVA prior to making any corrections to the grant.

- For Payroll corrections on the Labor Cost Management (LCM), a LARQ should be processed.
- For expenditure corrections on MMARS, an EX should be processed.

For more information on how to use these reconciliation methods and corrections, visit the [Comptroller's Intranet Site](#).

D. Backup documentation

As a cost reimbursement grant, all requests for reimbursement within expenditure reports must be for actual approved and incurred expenses. Expenditures should be reported in the month in which the expenses were incurred. **Detailed backup documentation to support all costs requested for reimbursement against a contract or ISA, including match expenses, must be maintained by the sub-recipient agency.** It is the responsibility of the sub-recipient agency to maintain all relevant expenditure documentation and to be able to provide documentation to MOVA upon request. If complete backup documentation to support expensed grant funds is not available upon request, MOVA reserves the right to request the return of any funds without adequate associated backup documentation.

While each sub-recipient agency is required to maintain complete backup documentation for all grant and match expenditures, the level of backup documentation a sub-recipient agency is required to submit with expenditure reports is determined by MOVA's Sub-recipient Risk Assessment. Backup documentation is also reviewed during routine desk reviews and site visits. Please see the sections on Risk Assessment and Monitoring Activities, under IV. Compliance with MOVA in Monitoring the Award, for additional information.

MOVA reserves the right to set or adjust what backup documentation is required within the course of an award cycle. The level of backup documentation required with the submission of expenditure reports will change immediately if complete backup documentation to support expenditures is not available upon request.

Backup documentation for expenditure reports should not include any personally identifiable client/program participant information. If documents that include client information must be submitted as backup documentation, all client information must be thoroughly redacted prior to submission. Examples of client information that should not be included in submitted backup documentation are names, addresses, and dates of birth. MOVA will not accept or retain expenditure reports with back-up documentation including this type of client information. In the event that MOVA does receive backup documentation including client information, the documentation will be returned to the sub-recipient and must be resubmitted without client information. Any request made by MOVA for backup documentation, such as expenditure reports and desk reviews, will not be considered as received and complete until a version without client information has been submitted.

E. 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 an 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 VOCA Policies and Procedures 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-recipients, 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 Administration
One Ashburton Place, Suite 1310
Boston, MA 02108
movagrants@mass.gov

Alternatively, 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

F. C-Thru Project

In an effort to make state spending information accessible to the public, the Commonwealth's Executive Office of Administration & Finance, the Office of the Treasurer and the Office of the Comptroller have worked jointly on the C-Thru Project (previously known as Open Checkbook). 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, visit the Office of the Comptroller's website www.mass.gov/osc.

APPENDIX A: SAFEPLAN Requirements

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.

The following outlines additional requirements and considerations for SAFEPLAN funded agencies.

Definitions Used:

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

Client - 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](#).

Host Agency - the community-based domestic violence program contracted to provide SAFEPLAN services. May also be referred to as a sub-recipient.

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 (advocate, intern or volunteer) who are employed or associated with a SAFEPLAN host agency, may engage in direct services.

Roles and Responsibilities - SAFEPLAN Host Agencies

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. Host agencies must adapt their hiring procedures and adhere to the following guidelines. Host agencies must hire an Advocate who has the noted preferred experience¹; reflects the diversity of the clients whom the SAFEPLAN Program serves, including, but not limited to bilingual bicultural advocates when feasible. 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.

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, along with any volunteers/interns who are providing direct service, who 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 supervision that does not meet the requirements of [M.G.L. c.233 § 20K](#), and if applicable [M.G.L. c.233 § 20J](#), puts the protections of confidentiality at risk.

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 a liaison with court personnel, District Attorney’s Office staff and MOVA.

Host agencies must notify MOVA of any changes to the policies and practices at their respective courts that may impact the provision of SAFEPLAN services.

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 unallowable activities as defined in the SAFEPLAN Policies and Procedures manual or outside their job description on SAFEPLAN time.

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.

Court Coverage Agreement & Scheduling. MOVA and the host agency must agree on the coverage of each court 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, their full names and the protocol to follow when an advocate will not be available in court. This Agreement must be updated when there is a change in SAFEPLAN personnel and/or court coverage. 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. Host Programs must provide a copy of the Court Coverage Agreement to the Presiding Justice, Clerk Magistrate or Registrar of each court in which they are providing SAFEPLAN advocacy services.

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 may 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 the 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's Office 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 who do 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 the necessary equipment (for example 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 discuss current challenges, initiatives, and updates. 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 MOVA SAFEPLAN staff 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 bi-annual 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 and include the attribution statement 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 and 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 and the MOVA SAFEPLAN staff immediately. The MOVA SAFEPLAN staff must also be informed when 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 the 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. As part of the SAFEPLAN Certification Advocates must complete [M.G.L. c.233 § 20K](#), and [M.G.L. c.233 § 20J](#) as applicable.

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.

Unallowable Activities

SAFEPLAN Advocates must not act as legal counsel for a SAFEPLAN client or to other SAFEPLAN staff.

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. 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 people 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. If 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 their Host Agency direct service supervisor.

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. For clients who are unable to write, a best practice would be to notify the clerk's office and request the client be permitted to make a verbal statement for the record. For clients who have limited English proficiency, a best practice would be to request an interpreter via the clerk's office and encourage the client to write an affidavit in their native language to be translated by the certified court interpreter.

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 District Attorney's Office to address criminal matters. The Advocate should work in collaboration and coordination 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. SAFEPLAN host programs will receive a 'SAFEPLAN Certification – Advocate Status Form' for each new SAFEPLAN Advocate, which will be completed by the host agency and submitted to MOVA upon completion of the training and shadowing. At that time, the SAFEPLAN advocate will receive their certification 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
- 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:

- A minimum of two (2) years' experience as a SAFEPLAN Advocate - *preferred*.
- Each host agency must have **one** designated Senior SAFEPLAN Advocate, or with MOVA approval, a second Senior SAFEPLAN Advocate as needed for oversight and coordination of staffing levels or regional coverage.

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

- Employment at a SAFEPLAN host program;
- Regularly scheduled one-to-one direct service supervision provided by host program;
- In court SAFEPLAN advocacy practice of a minimum of 12 hours per year;
- Completion of Continuing Education Series provided by MOVA;
- Attendance at quarterly regional meetings hosted by MOVA;

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.

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.

APPENDIX B: General Information

Massachusetts Office for Victim Assistance

One Ashburton Place, Room 1310

Boston, MA 02108

(617) 586-1340 (TEL)

(617) 586-1367 (FAX)

mov@mass.gov

www.mass.gov/mov

Related forms: <http://www.mass.gov/mov/grants/voca/info-for-grantees/>

Official MOVA communication:

MOVA maintains an email list as the official channel for grant related communications. This list is only for MOVA -funded programs. At the minimum, the executive director, the programmatic contact, and the fiscal contact from every host agency is required to join the email list. Contact your assigned program coordinator with your name, job title, and email address to sign up for the email list.

MOVA communication:

To subscribe to the MOVA email list, please email mov@mass.gov with the subject line "Subscribe to email list."

MOVA releases a monthly Victim Services Bulletin that includes all relevant victim services trainings, events, and meetings statewide, as well as news from the field, research, and legislative updates. If you would like to include an announcement in the monthly bulletin, you must submit the announcement to mov@mass.gov by the **1st or the 15th of preceding month**.

APPENDIX C: RESOURCES

FEDERAL

[Code of Federal Regulations](#)

[Department of Justice DOJ Grants Financial Guide](#)

[The Office for Civil Rights at the Office for Justice Programs](#)

STATE

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

[Uniform Financial Reporting](#)

[Commonwealth's Bill Payment Policy](#)

[Commonwealth's Equipment Surplus](#)

NON-PROFIT

[Non-Profit Accounting Basics](#)

APPENDIX D: Policies and Procedures Update Table

Date	Reference	Change	Explanation
11/19/14	Update to VOCA Guidelines	Draft Policies and Procedures adopted by VWA Board	Guidelines updated to “Policies and Procedures” to provide clarity for Sub-recipient programs
5/20/15	Update to VOCA Policies & Procedures	Effective P&P adopted by VWA Board, including removal of indirect cost rate*	Changes informed by FY16 RGA and needs assessment process
6/17/15	Update to VOCA Policies & Procedures	VWAB voted to adopt the revision to reflect the amended language addressing agency reimbursement for leave time.	Changes to ensure our VOCA grant is reimbursed equitably for employee leave and also that funding is more in line with other state funders
11/16/16	Update to VOCA Policies & Procedures		
6/21/17	Update to VOCA Policies & Procedures		
11/15/17	Update to VOCA Policies & Procedures	VWAB voted to adopt the revisions provisionally for the FY2019 open bid.	Updates do not apply to FY18 awards.
5/31/2019	Update to VOCA Policies & Procedures	Updated the Policies and Procedures modifying budget amendment instructions, established new rate limits for consultants, clarified monthly billing requirements	Updates apply to FY19/FY20 awards.
6/16/2021	Update to VOCA Policies &	Updated the Policies and	Updates apply to FY22 awards.

	Procedures	Procedures adding further guidance for pass-through organizations, eGrants requirements, Outcome Measurement Tool (OMT) requirements, client confidentiality policies, civil rights compliance, match waiver policies, clarification on MOVA's monitoring and risk assessment process, clarified indirect cost rates; updated backup documentation policies effective FY22	
6/13/2022	Update to VOCA Policies & Procedures	Updated Policies and Procedures to include VOCA eligibility requirements, VOCA special conditions, priority funding areas, desk reviews, and cash on hand requirements. Updated sections on monitoring activities and budget amendments. Added further guidance on supplanting, cost reimbursement, and backup documentation. Removed previous Appendix C (Allowable and Unallowable cost examples).	Updates apply to FY23-current awards.

6/5/2023	Update to MOVA Grants Sub-recipient Policies & Procedures	Renamed and expanded Policies and Procedures to include policies and procedures for all awards administered by MOVA (no longer applicable only to VOCA awards). Included descriptions of all funding streams now covered within the manual and added an additional appendix specific to SAFEPLAN award requirements. Updated sections on monitoring activities, consultant rates, contractor and consultant requirements and forms, and indirect cost negotiation.	Manual renamed and expanded to cover policies and procedures for all awards administered by MOVA. Updates apply to FY24 awards.
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APPENDIX E: Definitions

Administrative Expenses – Costs associated directly with administering a State’s victim assistance program.

Cash Match - Cash match includes funds garnered through other, non-federal grant sources, and spent for program-related costs for which services are counted as “VOCA”. The portion of cash match attributed to VOCA must be from an allowable funding source.

Child Account/Agency -Designation for recipient agency, in the case of this document, grant funds.

Contract – Commonwealth Standard Contract form utilized by MOVA for vendor agreements, including grants. A legally enforceable agreement between a contractor and MOVA.

Consultant – An individual that enters into contract with a sub-recipient to provide specialized victim services.

Culturally Specific- The term “culturally specific” means primarily directed toward racial and ethnic minority groups (as defined in section 1707(g) of the Public Health Service Act (42 U.S.C. 300-u-6(g)). The following is the definition from the Public Health Services Act for “racial and ethnic minority group” in the Culturally Specific definition: (1) The term "racial and ethnic minority group" means American Indians (including Alaska Natives, Eskimos, and Aleuts); Asian Americans; Native Hawaiians and other Pacific Islanders; Blacks; and Hispanics. (2) The term "Hispanic" means individuals whose origin is Mexican, Puerto Rican, Cuban, Central or South American, or any other Spanish-speaking country.

Direct Expenses – Goods or services that are chargeable or assignable to the award or cost objective in accordance with the relative benefits received; interchangeable with *allocable expenses*.

Indirect Cost - Costs that are not directly accountable to a cost object (such as a particular project, facility, function or product).

In-kind Match - In-kind match includes, but is not limited to, the valuation of in-kind real property, equipment, supplies, services, and other expendable property. “In-kind” is the value of something received or provided that does not have a cost associated with it.

Interdepartmental Service Agreement (ISA) - Agreement form utilized between two Commonwealth agencies. (Parent/Child).

Massachusetts Management, Accounting, and Reporting System (MMARS) – The official accounting system prescribed by the Comptroller for all

Commonwealth business.

Office for Victims of Crime (OVC)- Federal funder providing formula funding supports for victim compensation and assistance programs in every U.S. state and territory.

Outcome Measurement Tool (OMT) – Data collection tool utilized to evaluate funded programs by measuring outcomes and service effectiveness, and to ensure that we are effectively awarding funding to support the needs of victims/survivors

Parent Account/Agency – Designation for agency controlling ISA, in the case of this document, grant funds.

Performance Management Tool (PMT) – Online data collection tool utilized by Office of Justice Programs (OJP) to collect quarterly federal statistical data.

State Administering Agency (SAA) – OJP formula grants awarded directly to state governments, which then set priorities and allocate funds within that state.

Sub Contract - When used in the context of human and social services, an individual acting as a sole proprietor of an organization, or an organization which provides some or all of the needed human or social services, or operates a program on behalf of a contractor, provided, that the term subcontractor does not include an individual (including a client), or a firm providing personnel services or non-direct client services, unless specifically provided for in the service contract or agreement.

Sub-recipient – Agency or program under grant, contract, or ISA with MOVA.

Sub Award Report (SAR) - OJP required sub-recipient financial detail. Often contains reference to the VOCA priority categories.

Vendor - A provider of goods and/or services. It is common to refer to the vendor as a “contractor.”

Victim Witness Assistance Board (VWAB) – MOVA’s governing board, comprised of five members, including two District Attorneys, two public/survivor members, and chaired by the Attorney General.