

Match Waiver Policy – Subrecipient Information Sheet

Overview:

Victims of Crime Act (VOCA) regulations require subrecipients to contribute to the total cost of their VOCA 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. MOVA applies these regulations to all subrecipients of all grants administered by MOVA. As such, the updated policy applies to subrecipients of all MOVA-administered funds, not just subrecipients of VOCA funds.

In October 2023, MOVA updated its [Match Waiver Policy](#) in response to the passage of the VOCA Fix to Sustain the Crime Victims Fund Act of 2021 and the match waiver approval process bulletin the Office of Victims of Crime (OVC) issued in September 2021. Following the passage of the VOCA Fix Act, state administering agencies (SAAs), such as MOVA, were required to issue waivers of the match requirement for subrecipients during a pandemic national emergency and for one year after its end. The national emergency concerning the COVID-19 pandemic expired on May 11, 2023. New subawards or continuations made on May 11, 2024, or thereafter, will no longer qualify for mandatory match waiver. OVC further extended this deadline until the end of the applicable subaward period to allow states and subrecipients to streamline administration and management of their VOCA subgrants. The extended match waiver deadline applies to all subrecipients of MOVA-administered funds, not just subrecipients of VOCA funds.

The updated Match Waiver Policy reinforces MOVA's commitment to support trauma informed, culturally responsive, high-quality services that are accessible to all victims and survivors in the Commonwealth by adding increased flexibility regarding match requirements. Subrecipients have long expressed concerns about the financial and administrative burdens imposed by match requirements. With these concerns in mind, MOVA has expanded the unique and qualifying circumstances that meet match waiver eligibility and added the option to implement national emergency and blanket match waivers.

MOVA is authorized to issue match waivers either on an individual project, multi-project, or a blanket basis for subrecipients when the match requirements cause a direct impact on services provided to victims of crime. MOVA may waive match requirements for a group of subrecipients via multi-project waiver or on behalf of all subrecipients via blanket match waiver. Any match waiver initiated by MOVA, independent of any subrecipient action, will hereinafter be referred to as a MOVA-initiated match waiver. When a MOVA-initiated match waiver, that is a multi-project or blanket match waiver, is not in effect, subrecipients must submit a full or partial match waiver request to MOVA for match requirements to be waived. Partial and full match waiver requests will be considered, approved, or denied. MOVA approval is required for any match waiver requested by a subrecipient. Such match waivers will hereinafter be referred to as subrecipient-initiated match waivers.

A FAQ has been prepared below to answer common questions regarding match requirements as well as to provide additional context and background behind policy changes. This will be updated as additional questions and answers become available.

Frequently Asked Questions:

Q: Do VOCA match regulations apply to subrecipients of non-VOCA funds?

A: Yes. VOCA match regulations apply to all grant awards administered by MOVA, unless otherwise noted in the applicable procurement documentation.

Q: What is a MOVA-initiated match waiver?

A: MOVA reserves the right to issue blanket match waivers on behalf of all subrecipients, individual match waivers, and/or project-based match waivers based on the circumstances and needs of the Commonwealth. Examples of unique and qualifying circumstances include, but are not limited to, resource constraints, limited funding availability, and other related challenges as determined by MOVA. Subrecipients will have the ability to accept or decline the match waiver. MOVA may issue a match waiver during the application period or at any other time during the grant cycle.

Q: What is a subrecipient-initiated match waiver request?

A: This type of match waiver request is initiated by subrecipients when a mandatory or blanket match waiver initiated by MOVA is not in effect. MOVA approval is required for any match waiver requested by a subrecipient. Such match waiver requests must be justified and used when unique and qualifying circumstances exist. Circumstances that may apply include, but are not limited to:

- Natural disasters
- Pandemics or other geographic health crisis
- Mass violence/victimization events
- Resource constraints (e.g., employee recruitment and retention challenges or limited funding availability)
- Other events or challenges as determined by MOVA

Q: How will MOVA communicate match requirements to subrecipients?

A: When applications for grant funding are available, the Request for Grant Application (RGA) – or other procurement documentation – will include specific requirements regarding matching contributions. In the event of a blanket match waiver issued by MOVA, MOVA will notify applicable subrecipients that match requirements are waived for the duration of the award period in writing. The blanket match waiver may be stated in the applicable RGA or other procurement documentation.

Q: What considerations does MOVA make when reviewing an agency's match waiver request?

A: MOVA will consider practical and/or logistical obstacles to providing match (e.g., public agencies that do not engage in private fundraising and may have limitations on soliciting contributing funds); local resource constraints (e.g., rural community with limited local funding availability or volunteer capacity); increases to MOVA funding where local funding availability has not increased to the same degree; past ability to provide match; and program compliance with MOVA policies and requirements.

Q: How should subrecipients initiate a full or partial match waiver request during the application period?

A: MOVA may issue a blanket or multi-project match waiver (MOVA-initiated match waiver) during the application period and will notify the applicable subrecipients that match requirements are waived for the duration of the award period in writing. Subrecipients will have the ability to accept or decline the match waiver. Subrecipients must opt in or out of the MOVA-initiated match waiver as outlined in the applicable Request for Grant Application (RGA). If a MOVA-initiated match waiver is not in effect during the application period, subrecipients will request a full or partial match waiver as outlined by MOVA for the specific grant opportunity.

Q: How should subrecipients initiate a full or partial match waiver request outside of the application period when a blanket match waiver is not in effect?

A: When a blanket match waiver is not in effect, subrecipients will initiate a full or partial match waiver request outside of the application period by sending their assigned Program Coordinator a request on agency letterhead, addressed, and signed by the authorized signatory. The letter must include the following information, not to exceed one page:

- How is the grant currently being matched?
- What circumstances have compelled your agency to request a match waiver?
- What percentage is your agency requesting to be waived?
- Where applicable, how are resources constraints (i.e., volunteers, other funding, in-kind donations) impacting your agency's ability to fully or partially match?
- How would the denial of a match waiver adversely impact the grant funded project?
- Would the agency need to decline all or part of the grant award if a match waiver is not granted?

Q: If my agency requests and MOVA grants a full or partial match waiver outside of the application process and our agency has already contributed match, will match be removed from the budget?

A: If a match waiver is approved after you have already contributed match or if a waiver is requested outside of the application process, match will remain on the budget as a reflection of any contributions, but you will not be required to satisfy your original match requirement for the remainder of the fiscal year. The budget will be revised to reflect this via a budget amendment.

Q: How will MOVA notify subrecipients of the approval or denial of their match waiver request?

A: If a subrecipient accepts a MOVA-initiated blanket match waiver or initiates a match waiver request as part of the procurement process, MOVA will provide the subrecipient with a match determination letter, via email and/or other means, which will serve as notification of MOVA's decision to issue, partially approve, or deny the match waiver. If a subrecipient initiates a match waiver request outside of the procurement process, MOVA will provide a determination letter via email which will issue, partially approve, or deny the match waiver.

Q: Are match waivers indefinite?

A: Match waivers are only applicable for the duration of the subrecipient's contract or ISA (i.e., not in perpetuity) as outlined in a determination letter. Reapplication for match waivers is necessary during both renewal and open procurements.

Q: Is there a deadline for a subrecipient to initiate a match waiver request for a specific fiscal year?

A: Subrecipient initiated match waiver requests may be made at any point in a grant cycle. Any match waiver requested by a subrecipient within 30 days before the subaward end date, or after that date, must include at least one compelling reason explaining why the match waiver request could not have been made sooner and the match amount it is able to provide at the time of the request. MOVA will review these requests on a case-by-case basis.

Q: How does accepting a match waiver affect an agency's funding?

A: Accepting a MOVA initiated match waiver or requesting a subrecipient initiated match waiver does not impact your ability to receive funding or change your award amount.

Q: Is accepting or requesting a match waiver bad for my agency or will it impact our ability to receive funding?

A: No, not at all. There is absolutely no penalty for accepting or requesting a match waiver. We recognize that match requirements can be burdensome and, in some cases, very challenging to provide and we encourage subrecipients to have match waivers.

Q: Does a blanket match waiver apply to all potential match opportunities, or does it pertain to a certain cost category (e.g. volunteer hours, etc.)?

A: A blanket match waiver waives match requirements across all cost categories if you choose to opt into the waiver.

Q: What are possible reasons for opting out of a MOVA initiated match waiver or blanket match waiver?

A: From MOVA's perspective, there is no downside to accepting a blanket match waiver and subrecipients will not be penalized for opting into a blanket match waiver. That said, some agencies use their match contribution to compete for other grant programs and/or in legislative efforts. The decision to opt in or out of a blanket match waiver is based on individual choice.