

Massachusetts Office for Victim Assistance



Grants Policies and Procedures

Effective July 2025

The Massachusetts Victim and Witness Assistance Board

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MOVA's mission is to empower all victims and survivors of crime across the Commonwealth.

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I. Introduction

The Massachusetts Office for Victim Assistance (“MOVA” or “we/our/us”) is guided by the state’s Victim and Witness Assistance Board (VWAB). We manage federal and state dollars that fund grant programs that serve crime victims and survivors.

What this manual is

This manual is a general summary of the policies and procedures for all MOVA grant programs. This was updated in July 2025, and it replaces previous versions.

Organizations receiving MOVA funds (“grantees” or “you/your/yours”) must comply with these policies and procedures and with all state and federal laws and regulations that apply to the funded organizations and services.

What it isn’t

This manual is not an agreement or contract. It doesn’t:

- Include all laws and regulations that may apply to your organization and services offered
- Override applicable state or federal government requirements
- Promise or guarantee future MOVA funding

At any time, we can:

- Make changes to policies with or without notice
- Waive some federal requirements for grants supported by non-federal funds
- Ask you for more information
- End or suspend a grant contract

A. Funding

We receive funding from several sources and have the authority to oversee them. We distribute the funds to multiple organizations and state agencies as cost reimbursement grants.

Our funding sources include:

Victims of Crime Act (VOCA)

The 1984 act¹ established the [Office for Victims of Crime \(OVC\)](#) and the [Crime Victims Fund](#) to support and compensate victims of violent crimes. VOCA is federal funding.

SAFEPLAN

This state fund supports host organizations and civil court-based advocates for victims of domestic violence, sexual assault and stalking who seek protection via a restraining or harassment prevention order.

Drunk Driving Trust Fund (DDTF)

This state fund² pays for counseling and support for victims, witnesses, and family members of those injured by drivers operating under the influence of alcohol or drugs (OUI).

¹ Via 28 CFR Part 94 Victims of Crime Act Victim Assistance Program, passed in 1984 and amended in 1988. VOCA’s Catalog of Federal Domestic Assistance (CFDA) number is 16.575

² The fund is authorized under Massachusetts General Laws (M.G.L.) Chapter 10, Section 66

Human Trafficking Trust Fund (HTTF)

This state fund³ pays for emergency intervention and other support for victims of sexual and labor-related trafficking of any age. This includes forced labor and sexual exploitation.

State investments

This includes funds to support various victim and survivor services.

B. Eligibility

Organizations eligible for MOVA grants serve crime victims and survivors. A victim and/or survivor is defined as a person who has experienced physical, sexual, financial, or emotional harm as the result of a crime.

This document uses the words “victims” and “survivors,” and describes them as “participants”. We understand that not everyone defines themselves with these words. A person does not have to report a crime to law enforcement or participate in the legal system to be considered a victim or survivor of crime or to be eligible for services.

Grant recipients must:

- Operate in the Commonwealth of Massachusetts
- Be a nonprofit or government organization (including tribes)
- Nonprofits must submit annual filings and disclosures to the Attorney General’s Office (AGO). For the Annual Charity Filings (Forms PC) and instructions:
 - Go to the AGO’s [website](#) for forms and instructions
 - Contact the AGO’s Non-Profit Organizations/Public Charities Division at 617-963-2101 or charities@mass.gov
- Provide free services to victims and survivors of crime regardless of the individual’s income or finances
- Get financial support from other sources besides MOVA
- Show –
 - A history of providing effective services
 - Their capacity to provide their proposed services

C. Application and contracts

Grant opportunities and application instructions will be posted on our [website](#). You must provide information about your organization and the costs of operating the funded services when you apply for a MOVA grant.

If we approve a grant award, you’ll sign a contract. State agencies will sign an interdepartmental service agreement (ISA). Unless we approve changes, you must provide the services proposed in your application and outlined in your contract or ISA.

D. Termination and suspension

³ MOVA has authority to administer funds from the HTTF from Massachusetts General Laws (M.G.L. c.265 sec 56 and M.G.L. c. 10 sec 66A. State law defining human trafficking includes M.G.L. c. 265 sec 50, 51

We can end or suspend a contract or ISA with or without cause. This is described in the standard contract, ISA or [Commonwealth Terms and Conditions](#).

E. Grant performance period and budgets

The grant application will specify the performance period and any renewal option. We will identify each grant amount during the contracting process.

Performance periods and contract lengths vary, but budgets must follow the state's fiscal year, from July 1 of one calendar year to June 30 of the next. You must use funds within the fiscal year unless we approve:

- Carryover from one fiscal year to the next
- An extension of a grant period of performance

F. Waivers and exemptions to these policies and procedures

We can waive any requirement within our authority. Requests for a waiver must be in writing, and you must continue to follow the requirements unless we grant your waiver request.

G. Pass-through funding (subcontracts)

Subcontracting services as pass-through funding through subcontracts to others who will provide the services specified in your contract with MOVA may be considered.⁴ We also can deny, terminate, or suspend subcontracts at any time with or without cause.⁵

For subcontracts, you must:

- Follow [state](#) and [federal procurement guidelines](#)
- Manage subcontract fiscal and programmatic reporting
- Have an effective system to monitor how subcontractors use grant funds
- Ensure compliance with grant special conditions

Per the VOCA rule⁶, administrative and training costs for the pass-through entity can't exceed 5% of the grant. However, we may be able to support additional costs with other funding sources.

H. Funding priorities

We will outline funding priorities within the grant application. However, we are required to allocate at least 10% of our VOCA funding to each of these priority areas:

- Sexual assault
- Domestic violence
- Child abuse and neglect
- Previously underserved victims of crime

For the purpose of this funding requirement, the VWAB defines previously underserved victims. This includes, but isn't limited to:

⁴ See [Title 28 Judicial Administration](#), Chapter I, Part 94, Subpart B - VOCA Victim Assistance Program, 28 CFR 94.103 (C) Pass-through Administration

⁵ See [DOJ Grants Financial Guide](#), sec. 3.14 for subcontracts and 3.8 for subawards

⁶ [VOCA Rule](#) (§ 94.103 Part C)

- Survivors of homicide victims
- Victims from culturally specific populations
- Victims with disabilities
- Victims who identify as LGBTQIA2+
- Victims needing legal assistance
- Victims needing housing assistance
- Victims living in rural or isolated communities
- Victims involved in the justice system

I. Grant special conditions

MOVA and the grantees of MOVA funds must agree to and comply with special grant conditions. We will discuss them with you during contracting and you can see the [VOCA Special Conditions](#) on our website. We will also discuss any additional funding conditions when your grant award is announced.

II. Using Your MOVA Grant

A. Allowable costs

You must use your grant to provide free direct services to victims of crime, regardless of their income or financial resources. Your approved services and activities are outlined in your funding application, and contracting materials.

Allowable costs must be specified in your budget and pro-rated when necessary to reflect the appropriate portion of the expense that the grant supports. For example, if the grant supports one quarter of your victim service program, you would be able to include one quarter of the cost of your victim service program's office supplies. The following are some services, activities, and costs eligible for grant support. Please review the [MOVA Allowable and Unallowable Costs and Services](#) document on our website for more examples.

- **Services that respond to a victim's immediate emotional and physical needs**, including immediate intervention, safety planning and limited medical care
- **Physical, emotional, and mental support** for navigating life after experiencing a crime
- **Mental health counseling and care** related to the victimization
- **Services that help victims navigate the legal system**, such as:
 - Assistance with immigration, legal documents, guardianship, divorce, and custody issues that protect a victim's safety, privacy or other interests
 - Services, other than criminal defense, that help victims assert their rights in a court case
 - Assistance with motions to vacate or remove a conviction from the court record, or similar actions where allowed, based on a person being a crime victim
 - Civil actions, other than tort actions, that are reasonably necessary as a direct result of the crime
 - Funds to pay for lodging and meals for victims and their families so they can attend court
- **Peer support activities** that let victims meet other victims and share experiences, self-help, information, and emotional support

- **Reasonable moving and housing costs**, including but not limited to security deposits on transition rental housing, rental expenses, utilities, or repairs and maintenance costs needed to ensure a victim's security. However:
 - If you fund security deposits, you must have a policy for paying and recouping them
 - We can cap the amount or timeframe for relocation expenses, create additional requirements or require backup documents to ensure the effective use of funds
- **Services for incarcerated victims** for victimization that occurred prior to incarceration
- **Training, meetings, and forums** attended by grant-funded staff. Eligible expenses include:
 - Skills training for the professional development of grant-funded staff
 - Training related travel costs
 - Training materials for staff
- **Outreach activities** to create awareness of available services for crime victims
- **Equipment and IT** supporting victim-related activities. If equipment and IT services also support non-grant activities, they must be pro-rated
- **Essential management-related costs:** management activities performed by the executive directors, board members, or other top-level administrators of a victim service organization should not be supported with funds unless we approve. Coordination activities and management responsibilities that are essential to support direct services typically are allowable.
- **Reasonable food and beverage costs** that enhance direct services to participants. For example, refreshments for a support group.
- **Contracts or consultants** for specialized victim services
- **Operating costs** to provide direct services. Examples are rent, payroll expenses, travel and utilities.
- **Program supplies** that support direct services. Examples are materials for support groups, programming, and traditional and non-traditional therapies.
- **Professional dues and memberships** in your organization's name

B. Unallowable costs

The following are some examples of services, activities and costs that are **not** eligible for grant support:

- **Out-of-pocket victim expenses**, including:
 - Replacing stolen property
 - Insurance deductibles
 - Lost wages
 - Medical bills
 - Funeral costs, unless we pre-approve them

- **Most medical costs**, including:
 - Doctor and hospital bills
 - Nursing home care
 - Home healthcare and caregiver expenses
 - Emergency and non-emergency medical and dental treatment
 - Durable medical equipment and other healthcare items
- **Lobbying, political activity of any kind and advocacy for victim legislation and administrative reform**
- **Offender rehabilitation services** are not allowed. However, this does not prevent those who have caused harm or have been identified as an “offender” from being eligible to receive services related to a victimization they have experienced.
- **Studies and research efforts** by individuals, organizations, task forces or special commissions to research and study crime victim issues. However, you may distribute surveys to program participants if the surveys support tracking, improving or expanding funded services.
- **Activities to improve the criminal legal system**, including expert testimony for the prosecution and support for making the system more effective and efficient
- **Activities exclusively related to crime prevention**
- **Travel, lodging or meal expenses for victims subpoenaed to testify in a criminal case**
- **Court-ordered restitution** to reimburse victims’ expenses, unless allowed by the Final Rule ⁷
- **Fundraising activities and events** by employees on MOVA grant time
- **Other organizational costs**, including:
 - Building and vehicle liability insurance
 - Capital expenses and improvements
 - Building security and bodyguards
 - Property losses and expenses
 - Real estate purchases and mortgage payments
 - Construction costs
 - Interest and debts
 - Fines and penalties
- **Professional dues and memberships** in an individual's name
- **Equipment bought for another organization or individual to perform victim-related services**, unless allowed in a MOVA-approved subcontract

⁷ [28 C.F.R. 94.122\(f\)](#)

- **Development of training manuals or extensive training materials**, unless specifically listed as an allowed cost in the grant application
- **Food and beverages for staff or organization meetings, training or events**
- **Hosting, or organizing conferences or training**, unless specifically noted as an allowed cost in the grant application

C. Budgets

Unless we tell you otherwise, your budget should reflect the state's fiscal year from July 1 to June 30. This budget period is also called the "performance period." You can't:

- Commit grant funds before the performance period starts
- Enter into subcontracts before the performance period starts
- Carry unused funds over to the next fiscal year unless we approve
- Commit funds after the performance period ends. For example, if the performance period is from July 1, 2024 to June 30, 2025, the deadline is June 30, 2025.

D. Budget amendments

You can make changes to your budget by requesting a budget amendment to reallocate funds during the fiscal year. For example, you'd need a budget amendment to transfer funds from the equipment cost category to travel if the original budget doesn't have travel.

The grant amount will stay the same unless we approve an increase. We will consider budget changes for:

- Redirecting funds in or out of a cost category
- Changes affecting the level of direct service or the project scope
- Removing a cost category or adding one not in the original budget

Submitting a budget amendment request

Use eGrants, MOVA's electronic grants management system, to submit budget amendments. We must receive and approve them before you submit expense reports that reflect changes. For each request, include:

- The proposed changes
- Why you're requesting them
- The programmatic change form, with the required staff information if your request affects personnel

If we approve your request, we'll notify you in eGrants. You can move as much as 10% of the grant budget yearly. In addition, MOVA:

- Considers requests to shift more than 10% on a case-by-case basis
- Can limit the number of budget amendments you can submit during a performance period
- Must receive and approve a request before you submit expense reports reflecting the change
- Can hold reimbursement if a request isn't submitted correctly

E. Staff and other changes

You must report, and we must approve:

- Changes affecting your grant-funded services, including:

- Staff changes (new hires, resignations, medical leaves, changes in hours, etc.)
- Leadership changes, even if they aren't in the approved budget
- Fiscal, programmatic and data contact changes, even if they aren't in the approved budget
- Changes in scope of funded services

Changes affecting staff on the approved budget must be reported via a Programmatic Change Form in eGrants within 2 weeks of the change. You also must:

- Report staff changes that could affect grant-funded services to your program coordinator immediately
- Update names and contact information as needed in eGrants

MOVA pays grant funds on a cost-reimbursement basis. This means you incur the expenses first, then submit an expense report in eGrants to us for reimbursement. All requests for reimbursement must be for actual approved and incurred expenses. Report all costs and match expenses in the month you incur them. These expense reports show how you spent grant funds and your grant matching contributions, if applicable. Match requirements are described later in this document. Expenses must be:

- Costs allowed under the grant
- Included in the organization's approved budget
- Reported after they have been incurred
- Backed up by required documentation showing that the expense has been incurred

We can take money back if we or an audit find:

- The expense isn't in the approved budget
- The expense isn't allowed
- We overpaid
- You overbilled
- You don't have the required backup documentation showing that the expense has been incurred
- You breached our agreement, and it resulted in a debt to the federal government

Payment policy

MOVA follows the [Commonwealth's payment policy](#). We process payments to you within 45 days when reports are:

- Complete and error-free
- Submitted correctly
- For costs incurred in the performance period
- Supported by the required documentation when applicable

For example, if we receive a report on October 30th, the payment date is December 15th. If waiting 45 days for payment presents a challenge for your organization, contact your MOVA program coordinator. Go to the [Office of the Comptroller's vendor website](#) for current and past fiscal year reimbursements.

Grant closeout

Your last reimbursement request for the state's fiscal year – or the close of a contract – must:

- Cover all services in the final month of the contract or ISA
- Include payment for costs incurred on the final day
- Be submitted to us within 40 days after the last day of the state fiscal year (July – June)

Supplemental billing isn't allowed.

F. Backup documentation

Each organization must maintain complete and accurate backup documentation for grant and match expenses. Backup documentation is documentation that show the expense and that the expense has been incurred. Examples can include but are not limited to timesheets, invoices for consultant services, or receipts for an emergency hotel stay for a program participant.

If you can't provide the information we ask for, we can:

- Hold back funds
- Take back funds already paid
- Consider you in violation of your contract or ISA terms

Backup documentation must be maintained for all grant expenses. MOVA decides what backup documentation you must submit with expense reports or produce during desk reviews or site visits during the performance period. We can change the requirements immediately if we don't receive the necessary backup with your expense reports.

Backup documentation should not include personally identifiable information (PII) of program participants, such as names, addresses and birth dates. If your documentation has PII, you must remove or cover the information before submitting it to MOVA. We won't accept or process expense reports or other documentation with PII. We'll send them back and request appropriate documentation.

III. Budget Cost Categories

You will create a budget for your grant as part of the grant application. The budget is divided into cost categories, with each cost category having individual line items. The following is a description of each cost category.

A. Personnel- Salary

MOVA's grants can pay salaries for staff who provide direct services, supervision or administrative tasks such as completing required reports.

B. Personnel- Fringe

Fringe benefits include employer contributions and expenses for payroll taxes. Fringe benefits that can be covered with grant funds include but aren't limited to:

- Payroll taxes (Social Security and Medicare)
- Health and medical insurance
- Vision and dental insurance
- Worker's compensation
- Short- and long-term disability
- Pension plans

Personnel - salary and fringe

Personnel costs include gross salaries, fringe benefits and employer/employee payroll taxes. Reimbursement requests for these costs must be based on payroll records.

The records must show time and attendance for both full- and part-time staff your MOVA grant pays for. You can submit them in the standard format your organization uses, but they must be approved as outlined below.

Payroll records and time recording

Each employee funded through your grant (including volunteers and interns) must accurately account for their time working on grant funded time. Payroll records should:

- Clearly state the funding source used to support the employee's time or have the source easily identified by a cost center or code that references the funding source.
- If the employee is not supported 100% on your MOVA grant, salary and fringe must be billed and prorated accordingly.
- Reflect the **distribution of actual activities** or include **certification** of the work employees performed.
 - For distribution of activities: records must show an accurate distribution of the work performed. Supervisors and employees must review and sign the records at least every 6 months. Records should reflect the appropriate funding source.
 - For work certifications: employees must certify and supervisors must approve paper or electronic timesheets, time and effort reports or activity reports. Supervisors must know the work done firsthand, and certifications must match payroll records.
- An electronic system to track employee time is acceptable if you have a written policy for its use. The system must have a secure electronic signature and approval system. It must also be able to specify MOVA-funded time.
- You should follow Generally Accepted Accounting Principles (GAAP) and comply with the federal and state audit standards for your organization's funding level.

Staff leave

MOVA grants can fund regular pay for employees' approved leave. Examples of leave include vacation, sick time (regular and extended) and parental leave. Costs must:

- Comply with state and federal regulations and organizational policy
- Be absorbed by all the organization's activities in proportion to the relative amount of time or effort the employee devotes to each
- Not exceed the grant amount

Staff bonuses

MOVA grants can allow staff bonuses, as long as they're reasonable, necessary to support the grant-funded work and awarded equally to all employees regardless of the funding source used. Bonuses must:

- Be included in the original budget submitted as part of the grant application
- Be prorated for funded staff based on the percentage of their time on MOVA grant activities
- Not exceed 10% of the total grant

Bonuses requested via budget amendment during the fiscal year may not be approved.

C. Consultants

A consultant is an individual who provides specialized services that aren't available within the funded organization. An employee who gets a W-2 form from you can't be paid as a consultant with MOVA funds.

Consultants and independent contractors are considered self-employed. They get a 1099 from you for the services they deliver under the grant. You're responsible for providing them with MOVA policies and procedures and monitoring the work they do.

You must have and follow written procedures detailing how you select and hire a consultant and review these procedures periodically to be sure they comply with federal and state standards, laws, and regulations.⁸

Payment and contracts

What you pay consultants must:

- Be reasonable and consistent with market-based pricing and [OMB cost principles](#)
- Exclude travel, meals and lodging costs
- Be documented and kept on file
- Not exceed the federal limit of \$650 for an 8-hour day or \$81.25 per hour unless approved by MOVA
 - To pay a higher rate, submit a Request to Exceed Maximum Consultant Rate Form in eGrants
 - Do not start work at a higher rate until we approve it

If, for the grant period, the contract is:

- Under \$10,000 – send an invoice, signed by the consultant, with your expense report
- Over \$10,000 – submit a Sub-Contract Request Form in eGrants and a contract with the:
 - Consultant's name and title
 - Their contact information
 - Service(s) provided
 - Cost of the services

D. Office and program supplies

Grant funds can pay for office and program supplies needed to support crime victims' services and activities if they're in the approved budget. Office supplies include costs such as paper, printing and postage. Program supply costs include those for support groups and therapeutic, counseling and advocacy services.

E. Equipment

Equipment bought with MOVA funds must only be used for the grant funded services. The [Department of Justice \(DOJ\) Grants Financial Guide](#) defines equipment as tangible personal property having a:

- Useful life of more than one year
- Per-unit acquisition cost of \$10,000 or greater (or the amount identified in your organization's capitalization policy if it is less than \$10,000)

⁸ [See federal procurement standards in the Uniform Guidance, 2 C.F.R. § 200.317 through 2 C.F.R. § 200.326. For the state, review M.G.L. c. 7, s. 22 and the standards in 801 CMR 21.00.](#)

Equipment inventory

Your internal controls for new and replacement equipment must follow the accounting principles identified in the [DOJ Grants Financial Guide](#). This applies whether the grant pays for all or part of the equipment cost.

You must meet minimum standards for maintaining and tracking equipment, including:

- Take inventory and match what you have against your records at least once in a performance period
- Have a control system that prevents loss, damage or theft
- Promptly tell MOVA and properly investigate any equipment loss, damage or theft

Your equipment tracking records must include:

- A description
- The serial number or other identification number
- Where you got it
- The owner's name
- Date acquired
- Cost
- Amount of grant funds contributed
- Location
- Use and condition
- Disposition, including date of disposal and sale price

Depreciation

For accounting purposes, the useful life of assets should be the same for grant-funded and non-grant funded items. Useful life is based on Generally Accepted Accounting Principles (GAAP) and should consider details such as:

- What the assets are made of
- How you use them
- Technological developments
- Your replacement policies

F. Travel

Travel may be needed to provide services to participants, but it must be reasonable and cost-effective. Travel expenses covered by the grant include mileage, tolls and parking. Employees' everyday expenses to get to and from work aren't allowed.

Make mileage, parking and tolls separate line items when requesting travel reimbursement. Only submit expenses for:

- **Grant-funded staff** who travel to provide services or are on official business to attend meetings or training related to funded services
- **Participants** who travel to receive services. Costs must be reasonable

Mileage policy

You must provide us with your mileage reimbursement policy upon request. We'll reimburse your rate up to the current federal mileage rate. If you don't have a policy, use the federal policy and rate. If your rate or the federal rate changes during the grant period, so will your reimbursement.

Out-of-state travel

We encourage you to look for in-state training. If it isn't available, we must approve reimbursement for these out-of-state travel expenses via the Out-of-State Travel and Training form in eGrants prior to you incurring them. Expenses may include:

- Transportation
- Meals
- Lodging
- Training registration fees

The travel must be:

- Necessary to meet your MOVA grant goals and objectives
- Specific to the purpose of your services
- Appropriate for the position and responsibility of the individual(s) traveling
- A direct benefit to your funded services
- Within your travel policy

G. Contracts

Contracts used to provide services within the grant's scope are allowed. Examples include, but aren't limited to, specialized professional services, such as:

- Psychological consultation
- Legal services
- Interpreters
- Bookkeeping and accounting services

For contracts under \$10,000, you only need to submit a signed invoice with your expense report or maintain this documentation for your records as applicable by your assigned monitoring level.

For contracts over \$10,000, a contract and Subcontract Request Form are required. Additionally, you must submit a signed contract before the contractor can provide services. The contract must:

- State the subcontractor's name, title and contact information
- Specify the service(s) they will provide and the pay rate
- Be signed by both entities
- Certify that the subcontractor:
 - Received a copy of these Policies and Procedures
 - Will comply with the source grant and all related laws, rules, policies and procedures

We can approve, deny, terminate or suspend any contract or subcontract. This includes withholding payment for any unauthorized contractor, consultant or subcontractor.

Procuring goods and services

You must use your own procedures to acquire grant-funded goods and services. Your policies and procedures must be in writing, reviewed periodically, and consistent with applicable federal and state laws and regulations for procuring grant-funded services.⁹

H. Other

Costs in this category support funded activities and services that don't easily fit into other cost categories.

Common expenses are:

Organization rent and utilities

Organization rent and utilities (such as electric and natural gas) are allowable to the extent that the costs are necessary to provide direct services. Costs should be pro-rated to reflect the appropriate portion of the expense that the grant supports.

Training for staff

Training should be used to develop staff skills so they're better equipped to offer quality services to participants. Costs related to training include, but aren't limited to:

- Registration fees
- Travel costs – mileage, bus or train fare, Uber, hotel and airfare (as approved by MOVA prior to booking)
- Travel/per diem costs as outlined in the organization's policy
- Training materials

Food and beverage

These are allowed only when the cost is reasonable, and they enhance direct services to victims. An example is refreshments for participants during a support group. You can't use MOVA funding for food and beverages for staff or for meetings, conferences, trainings, or other events.

Participant gift cards

You can't give participants cash, but you can give gift cards. They must use the cards for emergency food, clothing or basic needs that help restore their sense of security after a crime.

If you use gift cards, you must have written policies and internal controls for their purchase and use. The policies should detail how you approve, distribute, track and account for the cards. At a minimum, you must track the purchase and use of all gift cards, and you must have two levels of approval within your organization documented for any funding used to support participant emergency expenses including gift cards.

Gift cards should be treated like cash. The same grant rules apply to both. For example, you can't exceed the approved budget amount, and you must give out the cards during the performance period. Carrying over to another year isn't allowed. All gift cards purchased in a performance period must be given out to participants before the end of the grant. Gift cards added to a budget after the third quarter of the performance period may not be approved.

⁹ [See the federal Procurement Standards in the Uniform Guidance at 2 C.F.R. § 200.317 through 2 C.F.R. § 200.326 and 801 CMR 21.00 of the state's M.G.L. c. 7, s. 22.](#)

Participant emergency shelter

Emergency shelter often includes short-term stays in a hotel. If you provide this for a participant, you must pay the hotel directly.

Participant housing assistance

Relocation and transitional housing costs include, but are not limited to:

- Reasonable moving expenses
- Utility payments
- Security deposits
- Rental payments

Payments must be paid directly to the provider and not to the participant.

I. Indirect costs

These are costs that support general organizational operations and are necessary for the overall functioning of your organization but are not easily identified in individual line items on your budget.

There are 3 ways to determine the indirect costs you submit for reimbursement:

1. You can use your organization's federal- or state-approved indirect cost rate with proof that it is approved and current. If you don't have an approved rate but would like to negotiate one, go to the Department of Justice's [Indirect Costs Resource Document](#) to learn how to request a rate.
2. If you don't have a federal- or state-approved indirect cost rate, you can request a "de minimis rate" from us. This lets you charge up to 15% of the total of the following [Modified Total Direct Costs](#) (MTDC) to the grant – but they must be on your approved budget:
 - All salaries and wages for staff
 - Fringe benefits, except tuition, scholarships and fellowships
 - Consultants and contracts for up to \$50,000 per line item for the total performance period
 - Office and administrative items
 - Travel for staff to provide services or attend training
 - Other expenses, except for –
 - Rent and related costs included in the rental agreement or lease, such as utilities
 - Capital expenses, such as land or building renovations
 - Participant supplies, expenses and support (such as gift cards, participant travel, housing supports, etc.)

MTDC includes both direct and administrative costs within your grant. It doesn't include any costs contributed as match. Once you calculate the allowable indirect cost, include it in your budget. You may request up to 15% of the total MTDC indirect allocation, or it can be split between your grant reimbursement and match as applicable.

3. Instead of using de minimis, you can negotiate an indirect cost rate with MOVA. Contact your program coordinator for more information.

IV. Program Requirements

A. Electronic grants management system (eGrants)

You must use [eGrants](#) to complete grant administration processes for your grant such as applications, reports, forms, and budget amendments. Visit [MOVA's website](#) for information about eGrants, user manuals and training resources.

B. Records retention

You must keep supporting documentation, reports and materials related to grant performance, compliance and spending for 7 years. This begins the day after MOVA's final payment under a grant. The start date is later if litigation, claim, negotiation, audit or other inquiry regarding the grant must be resolved.

C. Using volunteers

Grantees are required to use volunteers. Volunteers and interns increase your service capacity while benefiting from professional growth and training. You must document your use of volunteers and efforts to recruit volunteers. Volunteers and other unpaid staff don't have to provide direct services. They may do grant-related administrative work.

MOVA may waive the volunteer requirement if requested. Submit a Volunteer Waiver Request Form via eGrants. It must include:

- Proof of your recruitment efforts
- Evidence of provisions or circumstances that prohibit the use of volunteers. For example, a statutory provision that bars volunteers from certain positions because of liability or confidentiality.

D. Civil rights requirements

You must follow relevant state and federal civil rights rules and regulations. Visit MOVA's website:

- For more [civil rights information and compliance resources](#)
- To by us or an organization we fund

Office for Civil Rights online training

You must complete these sections of the [Office for Civil Rights \(OCR\)-Training for Grantees](#) once per grant performance period:¹⁰

- 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

The training can help you understand how to comply with federal civil rights obligations, statutes and regulations prohibiting discrimination. An appropriate organizational representative must complete it once each performance period. There is no certificate of completion for this training, so you must record the date that the training was completed and provide it to MOVA upon request.

¹⁰OCR is part of the U.S. Department of Justice's Office of Justice Programs

Findings of discrimination

You must promptly submit to MOVA any adverse findings of discrimination:

- Based on race, color, national origin, age, sex, disability, religion, gender identity or sexual orientation
- Issued in the past three years
- Issued by a federal or state court or federal or state administrative agency after a due process hearing

Equal Opportunity Employment Program (EEOP)

You must provide certain information to the Office for Civil Rights (OCR) to receive federal funds from MOVA on a yearly basis. This is required by the U.S. Department of Justice under the [Omnibus Crime Control and Safe Streets Act of 1968](#). Actual requirements vary based on organization type, size and the grant amount.

To meet EEOP requirements, use the EEOP Report Builder, OCR's online reporting platform. There, you will create an account and complete the required verification process.

The report builder will notify you if your organization is required to submit additional documents to OCR, such as an EEOP or utilization report. It also will generate a verification form. Keep the verification form and any other required documents on record for MOVA review.

For organizations that **receive direct federal funding** from the Department of Justice (DOJ):

- [Reporting Platform – EEOP Report Builder](#)
- [Report Builder User Guide](#)

For organizations that **do not receive direct funding** from the DOJ:

- [Reporting Platform – EEOP Report Builder](#)
- [Report Builder User Guide](#)

Non-discrimination in services and employment

You cannot discriminate against current or prospective participants or employees based on race, color, national origin, age, religion, sex or disability. [Massachusetts state law](#) further prohibits discrimination based on sexual orientation and gender identity. To comply, you must develop:

- Written policies and procedures outlining –
 - How you inform participants and employees of your non-discrimination practices
 - How participants and employees can file a complaint of discrimination
- Complaint processes should –
 - Provide prompt, fair, unbiased and equitable resolution
 - Describe how to file a complaint
 - Identify the employee/position responsible for the complaint process
 - Explain how your organization will investigate and resolve the complaint
 - Include a process timeline for response
 - Include training for staff to follow the non-discrimination and complain processes
 - Describe methods to inform people of your non-discrimination practices

Limited English Proficiency (LEP) access

[Title VI of the Civil Rights Act of 1964](#) requires you to take steps to provide people with LEP with free access to programs, services, activities and information. You must have written policies, procedures or practices that explain how you will provide written and verbal communications for people with LEP. Find more information on LEP requirements on [OCR's website](#).

Access to services for victims of federal crimes

You cannot exclude someone from services because the crime occurred in a federal jurisdiction such as a national park, an Indian reservation or a military base.

E. Confidentiality

You must have and follow a written confidentiality policy. It must protect victims' information from use or disclosure without their consent. This includes Personally Identifiable Information (PII) such as name, address and birthday.

Don't use confidential information in applications, budgets, expense reports or other documents we review to monitor your grant. If confidential information is disclosed, you must notify the individuals affected and take steps to protect their privacy and safety.

Exceptions may be considered when you're required by state law to share this information, for example, in a suspected child abuse case or by court order.

F. Breach of PII procedures

You must have written procedures about PII if you:

- Create or collect it
- Use or process it
- Store and maintain it
- Share, disclose or dispose of it

Your procedures must outline how you protect PII and your response to an actual or imminent breach of PII. This includes reporting it to your MOVA program coordinator as soon as possible.

When you notify us of a breach of PII, include these details:

- What happened – how did the breach occur?
- What types of PII were impacted? Was this an actual or imminent breach?
- Who was involved in the breach (staff, participants, others, adults/children)?
- How many people did the breach impact?
- Do you have a policy in place for breach of PII and if so, is it being followed?
- What actions have been taken by you to resolve the breach and to prevent a breach from occurring in the future?

G. Victim compensation

You must help crime victims learn about the victim compensation program to the extent possible without compromising confidentiality or privacy. You will:

- Have program brochures and applications available
- Establish policies or procedures to ensure that victims are informed about the program
- Make sure staff are familiar with it

- Help victims fill out applications and check on claim status

If you can't help with applications, you must be able to connect victims to a person or organization that can. For more information and resources, visit the [Massachusetts Victims of Violent Crime Compensation](#) website.

H. Grants policies and procedures training

You must send a representative (often the program or financial contact) to MOVA's annual Grants Policies and Procedures Training. You may have additional reporting requirements if you and your staff don't comply with this mandatory training. Additional training and technical assistance may be available for new staff and those who want or need training at other times during the year.

I. Unique Entity Identifier (UEI)

Throughout the performance period, you must have a valid Unique Entity Identifier (UEI). This is the primary identifier for entities registered in the federal government's System for Awards Management (SAM).

UEI's must be renewed annually. Go to [SAM.gov](#) for more information and instructions.

J. Conflicts of interest

You must comply with federal and state rules prohibiting the use of public funds for personal gain. Avoid any actions that might result in or appear to do any of the following:

- Use public funds or publicly funded positions for private gain
- Give preferential treatment to any person
- Harm public confidence in the integrity of the government or your organization

K. Funding source acknowledgement

These communications about funded grant activities must include a statement that acknowledges your grant as a funding source:

- Print publications, flyers, pamphlets, advertisements, press releases and notifications (in English and required translations)
- Electronic and web-based content

This is an example of a funding source acknowledgment statement:

- *This project was (partially) supported by MOVA through state investments, and/or 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, and/or the Human Trafficking and Drunk Driving Trust Funds.*

If you receive a SAFEPLAN award, this is an example of a funding source acknowledgement:

- *This project was (partially) supported by MOVA through SAFEPLAN funds from the Commonwealth of Massachusetts, and/or state investments, and/or 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.*

L. Suspension, debarment, ineligibility and voluntary exclusion

MOVA can't grant funds to organizations that are federally and/or state debarred, suspended, ineligible, or excluded. Funding will stop should any of these actions occur during the grant period.

M. Employment laws

You must comply with all applicable state and federal employment laws.

N. Fraud, waste and abuse

MOVA awards state and federal grants for specific purposes. You and any subcontractors you have must use the grant funds awarded for the identified purpose and avoid potential fraud, waste and abuse.

To do this:

- Follow all policies, procedures, and guidelines identified for your grant award
- Be aware of common grant fraud schemes
- Adopt effective fraud risk-management efforts and encourage other recipients of state and federal awards to do the same
- Learn more at [U.S. Department of Justice Office of the Inspector General \(US DOJ OIG\)](#) and [Massachusetts Office of the Inspector General](#).

Reporting fraud, waste, abuse and misconduct

The following types of incidents by any organization, employee, agent, contractor, sub-recipient or other person must be reported:

- Fraud, waste, and abuse
- A criminal or civil violation of laws against conflict of interest, bribery, gratuity, or similar misconduct
- Submission of a false claim under the False Claim Act
- Whistleblower retaliation

Report these issues, as soon as you're aware of them, to MOVA's Director of Grants Administration:

movagrants@mass.gov

If the matter involves fraud, waste or abuse of government funds or property, there are several ways to report it:

The Massachusetts Office of the Inspector General

- Hotline: 1-800-322-1323
- Online: www.mass.gov/forms/report-fraud-waste-or-abuse-of-government-funds-or-property
- Email: IGO-FightFraud@mass.gov

The US Department of Justice Office of the Inspector General

- Hotline: 1-800-869-4499
- Online: <https://oig.justice.gov/hotline/grant-complaint/form>
- Mail: U.S. Department of Justice, Office of the Inspector General
Investigations Division
950 Pennsylvania Avenue, NW
Washington, DC 20530

O. Written determinations of suitability to interact with minors

You and your subcontractors (if applicable) must ensure that individuals covered under the grant may interact with people under 18 only if you determine them suitable. You must document that you have:

- Checked the required public sex offender and child abuse websites and registries. These include:
 - The national registry,
 - Registries in all jurisdictions where the covered individual has lived, worked or attended school in the last 5 years, and
 - Registries in all jurisdictions where the covered individual is expected to interact with minors
- Completed the required background checks. These include:
 - All jurisdictions where the covered individual has lived, worked or attended school in the last 5, and
 - All jurisdictions where the covered individual is expected to interact with minors
- Reviewed and updated the written suitability determination for these individuals at least every 5 years
- Created policies or procedures to document the steps you will take to determine suitability for covered individuals to interact with minors
- Documented the written determinations for each covered individual and keep them in your records

For more information, read the grant condition [‘Determination of suitability required, in advance, for certain individuals who may interact with participating minors’](#) on OJP’s website.

P. Employment eligibility verification

Your hiring process for any position funded with grant funds (partly or fully) must include verification of employment eligibility. You must:

- Have written policies and/or procedures that ensure the hiring process for any position funded in whole or in part by grant 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 positions funded in whole or in part by grant funds
- Maintain records of all employment eligibility verifications relevant to your MOVA grant in line with I-9 retention requirements
- Notify everyone doing grant-funded activities of this requirement and U.S. employment eligibility provisions¹¹ and provide necessary training

For more information, read the grant condition [‘Employment eligibility verification for hiring under the award’](#) on OJP’s website.

V. Monitoring and Compliance

A. Overview

We routinely monitor grant activities to make sure you’re meeting all requirements, including:

- These policies and procedures
- Grant award conditions

¹¹[Federal law 8 U.S.C, 1324a\(a\)\(1\) and \(2\)](#)

- State and federal rules and regulations that apply

We will document an issue for resolution to those who don't follow all grants rules or procedures. If the issue for resolution isn't addressed, it may affect our monitoring activities and funding decisions. Serious violations of policies and procedures that are not addressed could result in the immediate end of a grant.

B. Risk assessment

We assess grant performance to determine the level of monitoring each grant will receive.

The assessment is broadly based on these topics:

- Responses to the organizational questionnaire you complete as part of the grant application
- Results of monitoring activities such as desk reviews and site visits
- Total amount of funding granted
- Timeliness and accuracy of performance and expense reports
- Adherence to the approved budget in terms of scope and spending
- Overall performance, including:
 - General grant administration and performance
 - Your response to MOVA requests
 - Compliance with policies and procedures

Based on the risk assessment, MOVA gives each grant a monitoring level of 1, 2 or 3. There also is a "new" category for those who:

- Have never received funding from MOVA or
- Don't have a recent, comparable grant from us

C. Program monitoring

We use the risk assessment to assign monitoring levels to each grant. How and when we monitor grants depends on the monitoring level we assign. Monitoring levels can change during a performance period, but these minimum standard activities apply at each level:

- *Level 1*
 - Monthly review of expense reports (without backup documentation unless requested by us)
 - One desk review each fiscal year to review at least one months' expense report and backup documentation
 - Mid-year review, and meeting if needed after the review
 - Fiscal year-end closeout to reconcile spending and other matters
 - One site visit for financial, administrative and programmatic monitoring at least once every 4 years
 - Technical assistance as needed
- *Level 2*
 - Monthly review of expense reports (without backup documentation unless requested by us)
 - One desk review each fiscal year to review at least 2 months' expense reports and backup documentation

- Mid-year review, and meeting if needed after the review
 - Fiscal year-end closeout to reconcile spending and other matters
 - One site visit for financial, administrative and programmatic monitoring at least once every 3 years
 - Technical assistance as needed
- *Level 3*
 - Monthly review of expense reports with complete backup documentation for all expenses– unless we decide to waive this requirement for the rest of the fiscal year after reviewing two quarters worth of reports. If that happens, your program coordinator will notify you and a desk review may take place within the grant cycle.
 - Mid-year review and meeting
 - Fiscal year-end closeout to reconcile spending and other matters
 - One site visit for financial, administrative and programmatic monitoring at least once every 2 years
 - Technical assistance as needed
- *New recipients and new grants*
 - Monthly review of expense reports with complete backup documentation for all expenses– unless we decide to waive this requirement for the rest of the fiscal year after reviewing two quarters worth of reports. If that happens, your program coordinator will notify you and a desk review may take place within the grant cycle.
 - Mid-year review and meeting
 - Fiscal year-end closeout to reconcile spending and other matters
 - One site visit for financial, administrative and programmatic monitoring at least once during the first year of the grant. Following the first year, the frequency of site visits will depend on monitoring level assigned.
 - Ongoing technical assistance for the first year and scheduled technical assistance visits as needed after that

D. Site visits and desk reviews

We conduct site visits and desk reviews throughout the performance period to ensure grantees comply with these policies and procedures and all applicable state and federal rules and regulations. We also provide technical assistance when needed.

Site visits

We visit grantees regularly during the grant period. We use these site visits to monitor administrative, financial, and programmatic compliance and grant performance. At a minimum, we review:

- Accounting records and independent, state and/or federal audits
- Administrative grant records
- Required policies and procedures
- Compliance with grant conditions and civil rights requirements
- Progress on the approved grant program's services, activities and spending

You must complete pre-visit worksheets before the site visit, and you'll get a site visit report after it. The report will outline the areas we reviewed and identify any issues for resolution.

You must address any issues for resolution with corrective actions by the deadlines we give. We record failure to do so in your grant history, which may impact current or future funding.

Desk reviews

Standard desk reviews look at financial records throughout the performance period. Additional reviews may be needed for specific award, administrative or fiscal concerns. We will:

- Request all backup documentation for expenses billed to the grant over a specific time period. This can include timesheets, payroll records, receipts and other information
- Review the information and send questions or concerns back to you
- Document any issues with compliance
- Follow up if corrective actions are needed

E. Document access

You must give MOVA access to all documents related to your grant. Confidential participant records should be redacted.

VI. Financial Policies and Procedures

A. Accounting records and financial management system

You must have a financial management system that can record and report on grant funds received, allocated and spent. You also must maintain financial records that fully disclose the amount and use of funds received, including:

- Documentation of all financial activity related to the award, including both revenue and expenses
- Time and attendance records with time devoted to allowable victim services
- If reporting match, records of funding for the portion of the project MOVA funds don't support
- Other records that contribute to an effective audit

MOVA and others, including state or federal auditors, can review these records anytime.

B. Grant recipient responsibility

You must follow accounting policies and procedures set by the federal government. These include:

- OMB-Circular A-133 standards for spending federal funds. For more on managing federal grants, visit the Office of Justice Programs (OJP) and the Office of Management and Budget
- OCFO Guidelines, Effective Edition
- OMB Circular A-122 for non-profit agencies or OMB Circular A-87 for local government agencies

You also must keep:

- Accounting and control procedures to ensure that grant funds are used only for approved expenses and not for costs funded by or charged to other sources
- Accurate accounting records that –
 - Separate grant expenses from other organization funds
 - Separate grant expenses by grant type if you receive more than one grant from MOVA
 - Track revenue accurately by revenue stream
 - Track costs by fiscal year(s) and performance period
 - Update financial records as changes occur within a performance period

C. Matching requirements

Unless otherwise noted in a grant application, you must contribute 25% of your grant amount as a cash or in-kind match. This means your match would be \$25,000 if your grant is \$100,000. Examples of in-kind match include but are not limited to a donation such as furniture or office space or volunteer time.

Examples of cash match include other grants received by your organization or fundraising revenue. We have the authority to issue match waivers.¹² We will tell you if a waiver is available and provide you with the option to accept or decline it. Learn more about match waivers in section D below.

If a match is required, you will:

- Apply MOVA grant fund requirements and restrictions to match funds
- Treat only allowable costs as match costs
- Maintain records showing the source and amount of your match
- Ensure and document that all cash match funds are from non-federal sources
- Account for all in-kind services involving personnel (such as interns or volunteers) the same way as funded personnel
- Use a rate of up to \$18 per hour for volunteers and interns you use as an in-kind match
- Not include fringe costs for volunteers and interns
- Count material contributions as a match on a cash accounting basis. These are things like furniture, equipment, office space, and supplies. You must count them during the performance period they're received in and not on a depreciation or accrual basis.
- Provide proof of the value of donated professional services you use as match. The donor must provide documents proving the value of their services, and we must approve the services on the approved budget.

D. Match waivers

Through our [match waiver policy](#), we can issue waivers for most grants. Typically, we communicate this in the grant application, but we can issue a match waiver at any point in a performance period.

If we don't issue a match waiver, we will consider full or partial match waiver requests during the grant application or performance periods. Ideally, this is done up to 30 days before the end of the performance period. We may consider post-award requests with proper justification.

MOVA must approve any match waiver request, and the waivers only apply during the performance period in your contract. There is no penalty for accepting or requesting a match waiver.

Match waiver requests must be justified and used for unique circumstances, such as:

- Natural disasters
- Pandemics or other geographic health crises
- Mass violence or victimization events
- Resource constraints (e.g., employee retention challenges or limited funding availability)
- Other circumstances we identify

If you would like to make a match waiver request during the performance period, contact your program coordinator to learn what information you need to provide in your request.

¹²We've done this since Congress passed the [VOCA Fix to Sustain the Crime Victims Fund Act of 2021](#).

E. Supplanting

You can supplement state and local funding with your MOVA grant but you can't "supplant" it. This means you can't use your MOVA grant to pay for costs you already have other state or local funding to pay for.

These examples explain the difference:

- *Supplementing*: The state gives you funds to hire 2 new forensic interviewers, and you also receive a MOVA grants to hire 3 new forensic interviewers. At the end of the year, you have hired 2 new forensic interviewers with state funds and 3 new forensic interviewers with MOVA funds. Under this scenario, there is no supplanting violation because you used the MOVA funds to supplement (rather than to supplant) the hiring of the new forensic interviewers.
- *Supplanting*: The state gives you funds to hire 2 new forensic interviewers, and you also receive a MOVA grant to hire 3 new forensic interviewers. At the end of the year, you have hired 3 new forensic interviewers with your MOVA grant and none with state funds. Under this scenario, it may be considered a supplanting violation because you used the MOVA funds to supplant (rather than to supplement) the hiring of new forensic interviewers.

F. Audits

You must comply with all audit policies from the State and the Federal Office of Management and Budget (OMB) and the Office of the Chief Financial Officer (OCFO).¹³ These include an annual single audit when grantees spend at least \$1,000,000 per year under federal grants. Pro-rated single audit costs for grantees that meet this federal audit thresholds may be charged to the grant.

Financial audits for grantees that do not meet the federal audit thresholds are encouraged; however, independent audit costs may not be charged to the grant.

G. Cash on hand

The money you receive from us should be used within 10 days of receiving it. For example, you need brochures for your MOVA-funded services. You order them and submit the vendor's \$100 invoice to us for reimbursement. If you:

- Already paid the vendor, the \$100 is an expended cost and you keep the reimbursement
- Haven't paid the vendor, the reimbursement is an "incurred cost" and you must pay the vendor within 10 calendar days

You can ask us to reimburse you for:

- *Incurred costs* – costs that have happened but haven't been paid
- *Expended costs* – costs that have happened and have been paid

Payroll costs have similar guidelines. You can include payroll in your request to us once the employee has put in the time. If you haven't paid the employee by the time we reimburse you, you must pay them within 10 days.

¹³ [2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)

H. Organization income and free services

Generating income from funded personnel time is not allowed. All funded services must be provided for free to participants. The participant's income or financial resources can't be used to decide if they can receive services.

VII. Financial Policies for State Agencies

A. Interdepartmental Service Agreements (ISAs)

State agencies receiving grants from MOVA enter into an Interdepartmental Service Agreement, also known as an ISA. An ISA is a formal agreement between state agencies or departments to provide resources and support each other's operations. State agencies will sign ISAs at the start of the performance period.

B. MMARS expense classification

State agencies will abide by the Massachusetts Comptroller's policy and use the Massachusetts Management and Reporting System (MMARS), Labor Cost Management (LCM), and Commonwealth Information Warehouse for reporting. You must use the right grant payment code to get payments through MMARS. Your ISA Attachment B will tell you what codes to use in MMARS for your grant.

All grant activity must:

- Be coded to the appropriate grant budget line
- Include the object classes specified in Attachment B of the ISA
- Align with the approved grant budget

See the [Comptroller's Expenditure Classification Handbook](#) for more information on using object classes.

C. Reconciliation and reporting

State agencies must reconcile grant-funded expenses monthly. Use:

- A Commonwealth Information Warehouse query (detail expenditures, object classes, acceptance date, fiscal year and program code); and/or
- The MMARS Reimbursement Grant Budget Screen (BQ88*)

If you use the wrong program code for the current fiscal year's spending, correct it as soon as possible.

To correct this type of error, you must process:

- A LARQ for payroll corrections on Labor Cost Management (LCM)
- An EX for corrections on MMARS

Notify MOVA before making any corrections to the grant.

For more information about grant reconciliation and reporting, visit the [Comptroller's Intranet Site](#).

D. Federal audit protocol

All state agencies must comply with the State Comptroller's policy and [protocols for audits, audit follow-up, and department initiated audit activity](#) when federal authorities notify them to perform an audit.

Federal regulations require federal auditors to build on work already done in the Statewide Single Audit.

E. Uniform Financial Report (UFR) for Commonwealth vendors

If required by [808 CMR 1.00](#), you must file one of these:

- Uniform Financial Statements and Independent Auditor's Report (UFR)
- UFR cover page and exceptions/exemption documentation or
- An [alternate report](#), as directed by the Operational Services Division (OSD)

F. Budget transfers

State agencies with ISAs must be sure they're spending funds correctly. Attachment C of the ISA identifies the source of the funds and when you'll get them.

In MMARS, you'll see your grant program budget on table BQ88. Your yearly budget for MOVA programs is on table BQ89.

Payroll Expenditure Report Corrections (referred to as PRADJ or EX in LCM) and other adjustments across fiscal years or federal grant awards aren't allowed without MOVA's prior approval. You can submit an updated Attachment B to your program coordinator for review and approval.

If ISA Attachment B budget lines include compensation to regular employees (object class AA) supported by the ISA, they must also include the DD (D09) object class. This must cover mandated chargebacks for:

- Employee pension
- Health insurance and terminal leave
- Unemployment compensation insurance premiums
- Universal health insurance contributions
- Employer share of Medicare tax

Expenses may trigger indirect costs. These indirect costs are included in the ISA and the approved budget. State agencies must provide us with an indirect rate letter from the Comptroller's office. State agencies can only use program-related expenses or indirect chargebacks as matching sources – per the Massachusetts Management, Accounting, and Reporting System (MMARS) and Comptroller policy.

VIII. Reporting

You must submit all required reports to us to comply with the terms of your MOVA grants. Be sure to submit them on time and according to the instructions for each.

We can revise reporting deadlines and processes at any time. If we make changes, we'll post them on our [funding and grants administration website](#) and email them to you. We also can waive or revise reporting requirements for new grant recipients during the initial performance period.

Direct all questions about reporting to your MOVA program coordinator.

A. Subgrant Award Report (SAR)

This report specifies the purpose and intent of the grant. You'll complete it within the first quarter of the performance period. You'll also make changes to it if needed during the performance period.

We'll provide more information about the SAR after we contract with you.

B. Outcome Measurement Tool (OMT)

You'll use the [Outcome Measurement Tool \(OMT\)](#) to report performance data to us each quarter. The report will include *only* data related to:

- Services and activities supported by grant funds (and match funds, if any)
- Participants served by grant-funded staff (and any staff or volunteers used as match, if applicable)

Data on services provided or participants served by other staff who are not MOVA grant funded should not be included. You must have policies and/or documented processes to explain how you track, report, and validate performance data.

If we partly fund services or staff, you need an accurate method for tracking the time for each and allocating it to the grant. For example, if 50% of an employee's time is grant-funded, you report only services provided and participants served during that time in OMT.

OMT data must be submitted via eGrants according to the following dates:

Reporting Period (RP)	Due Date	Notes
RP 1: July 1 through September 30	October 31	All participants are reported as "new"
RP 2: October 1 through December 31	January 31	
RP 3: January 1 through March 31	April 30	
RP 4: April 1 through June 30	July 31	Complete "annual" narrative questions

Reporting Amendments

We can request additional, revised reports if you add or remove staff retroactively to your grant budget.

APPENDIX A: SAFEPLAN Programmatic Requirements

SAFEPLAN (Safety Assistance For Every Person Leaving Abuse Now) is MOVA's statewide court-based advocacy program. SAFEPLAN organizations must follow all MOVA's policies and procedures as well as additional requirements.

- **SAFEPLAN host organizations** are organizations that receive MOVA funding to run SAFEPLAN programs
- **SAFEPLAN advocates/staff** are the people who provide SAFEPLAN services
- **SAFEPLAN services** are the activities paid for with SAFEPLAN grant funds

A. About SAFEPLAN

SAFEPLAN advocates are stationed in certain district, probate and family courts throughout the state. They work with court personnel, district attorneys' offices and other criminal, legal, and social service agencies. They:

- Help people who have experienced domestic violence, sexual assault and stalking and who are considering a 209A restraining order or a 258E harassment prevention order
- Are specially trained and certified by MOVA to offer services, including:
 - Crisis intervention
 - Assistance with [protective order applications](#) and in-court support
 - Individualized safety planning
 - Referrals to critical resources
 - Education on options available
 - Support and advocacy services

Only trained and certified SAFEPLAN staff may provide direct services to program participants. Staff include advocates, interns or volunteers employed by a SAFEPLAN host organization.

B. Court Coverage Agreement (CCA) and scheduling

We and the host organization must agree on coverage for each court. This agreement is called a Court Coverage Agreement (CCA). You must update it whenever there are changes to staff or court coverage assignments. The approved CCA remains on file at MOVA.

The CCA includes:

- The schedules and court assignments for each advocate, volunteer and intern
- Their full names
- What to do if the assigned advocate can't be in court

Advocates may be assigned to one or more courts, or they can fill in as needed at any court in their region. They can't provide any job duties outside the scope of their SAFEPLAN services on MOVA-funded time.

To fulfill SAFEPLAN requirements, you must:

- Ensure court coverage including when an advocate is absent as planned or for an emergency
- Notify the courts of the coverage plan
- Provide a copy of the CCA to the presiding justice, clerk magistrate and/or registrar at each court the advocate serves

Holiday coverage

Each organization will follow its holiday policy, but advocates should be available and in court on days when courts are open. If your organization is closed but the court is open, you must have a backup plan to ensure that victims can access services. For example, you could:

- Request the clerk's office provide your hotline number for those who are seeking a protective order
- Provide contact information to the clerk's office for an on-call supervisor to speak with the victim
- Work with the District Attorney's Office to arrange coverage.

Each organization must submit its holiday policy upon request.

C. Allowable SAFEPLAN services

SAFEPLAN advocates can offer victims the following crucial benefits:

- **Immediate support:** Victims often require immediate help and a comforting presence during their civil legal proceedings. Advocates provide timely and effective support.
- **Trust building:** Advocates establish trust and rapport with victims through 1:1 support. Victims are more likely to talk about their experiences and needs with someone they trust.
- **Referrals and resources:** Advocates can connect victims with essential resources. They are physically present and access real-time information and court-based resources, such as clerks, the district attorney and probation offices.
- **Education and empowerment:** Victims benefit from in-person discussions. They can ask questions, seek clarification and learn about their options and rights.
- **Advocacy and emotional support:** Advocates can provide immediate emotional support and advocacy for victims. This ensures that the victims' voices are heard, and they feel safe during court proceedings.

D. Unallowable SAFEPLAN activities

SAFEPLAN host organizations and advocates can not offer the following activities or services:

- **Legal counsel:** Advocates are not lawyers and can't give legal advice or speak for victims in court. The advocate only informs program participants of their legal rights and options. The advocate can provide referrals for legal services as appropriate. However, participants must choose their course of action.
- **SAFEPLAN services for friends, acquaintances or relatives:** Advocates must tell participants they can't help them if they are friends, acquaintances or relatives. A backup advocate, organization staff member, volunteer or intern should provide services to those participants.
- **Translation and interpretation:** Courts must provide court-certified interpreters and translators for all proceedings. SAFEPLAN advocates who are multi-lingual:
 - Are encouraged to provide services in the participant's primary language if they can
 - May help people they know, but only as an interpreter or translator for services another advocate provides.
 - Must not, under any circumstances, provide interpretation or translation services –

- During court proceedings
- For defendants
- **Mediation services:** These services aren't allowed under a SAFEPLAN grant, even when a judge or court staff asks for them. If this happens, the advocate must:
 - Politely tell the judge that SAFEPLAN program policies and procedures prohibit mediation,
 - Suggest an alternative, such as waiting until the parties have lawyers and
 - Ask for time to contact their supervisor
- **Escorting program participants:** Advocates can't be with a participant anywhere but in the courthouse. SAFEPLAN Advocates may not escort participants to their homes, vehicles, or to other public places.
- **Affidavits:** Advocates must not write these statements for participants. If a participant can't write, let the clerk's office know and ask for permission for the participant to make a verbal statement for the record. For participant with limited English proficiency, advocates should urge them to write the affidavit in their native language and ask the clerk's office for a certified court interpreter to translate it.
- **Photos:** Advocates must not take pictures of victims' injuries or any other evidence. You must follow all confidentiality laws, regulations, and policies when considering keeping photographs or other records that may be used as evidence in a criminal case.
- **Services related to criminal cases:** Advocates must not provide services related to a criminal matter. Advocates must refer SAFEPLAN participants to the victim witness assistance program of the District Attorney's Office for all criminal matters. The advocate should coordinate with this DA's victim witness advocate to provide services.
- **Counseling services:** An advocate must not provide counseling or therapy to SAFEPLAN participants, even if they have a counseling degree or license. Advocates can refer SAFEPLAN participants to a community-based organization that provides those services.
- **Media:** Advocates must not make any comments to the media without prior approval from us. This includes comments about the SAFEPLAN program, participants or cases.

E. Direct service supervision

You must provide a supervisor for the advocate and any volunteers or interns providing direct services. The supervisor must:

- Meet the requirements of a "direct service supervisor of a domestic violence victims' program" under state law.¹⁴
- Meet state requirements¹⁵ for confidentiality if they supervise advocates for dual agencies (domestic violence and sexual assault) if applicable.

Client confidentiality is at risk when supervision doesn't meet these legal requirements.

¹⁴ [M.G.L. c.233 § 20K](#)

¹⁵ [M.G.L. c.233 § 20J](#)

F. Direct service management

You're responsible for the day-to-day SAFEPLAN functions at the courts where you are contracted to provide services. These duties include, but aren't limited to:

- Administrative tasks
- Case support and guidance
- Direct service supervision
- Serving as a liaison with court personnel, District Attorney's Office staff and MOVA

You must notify us of any changes to court policies and practices that may impact service provision in those locations.

G. In-person court-based services

Due to the sensitive nature of the services and to best support victims, SAFEPLAN advocates must prioritize in-person interactions at their assigned courts. Face-to-face engagement builds rapport and fosters a sense of trust and security.

You must request exemptions to this in-person court requirement. In cases where we approve remote or hybrid services, the Court Coverage Agreement must detail this agreement and schedule.

H. Collaboration and coordination

We expect you to have experience working with the community and other service agencies. You'll build and maintain relationships with the local District Attorney's Office, court personnel and other allied partners to maximize service delivery and create a respectful, collaborative process for cross-referrals.

We encourage you to network and engage with the community. However, these activities should only take place when court coverage is in place. Allowable activities include but aren't limited to attendance and participation at:

- Roundtable and task force meetings regarding direct service provision
- High-risk team meetings
- Training, workshops or conferences

I. Office space for advocates

You must provide reasonable office space and equipment (such as a cellular phone) for SAFEPLAN staff who don't have designated space at the courthouse. Advocates should use the space to:

- Store confidential files in a locked area (if needed)
- Provide follow-up services (such as phone calls)

J. Communications

SAFEPLAN services must be named and advertised as 'SAFEPLAN' and cannot be referred to by another name. See Funding Source Acknowledgement for more information.

K. Confidentiality and official record keeping

Participant communication obtained by a SAFEPLAN advocate is confidential and privileged.¹⁶ Advocates

¹⁶ See [M.G.L. c.233 § 20K](#) and [M.G.L. c.233 § 20J](#) (if applicable)

must adhere to your confidentiality policies. As part of the SAFEPLAN Certification requirements, advocates must complete [M.G.L. c.233 § 20K](#) and [M.G.L. c.233 § 20J](#) as applicable to your organization.

Participant files and court subpoenas

You must keep confidential SAFEPLAN files. You are the official keeper of these records if they are subpoenaed for a legal case. As the record keeper, you must:

- Assert the domestic violence or sexual assault counselor privilege when it's challenged and not been waived
- Inform us immediately if an advocate or confidential records are the subject of a subpoena or court order in a civil or criminal case
- Keep records in a way that assures participant confidentiality
- Have a policy for destroying records. We require you to keep SAFEPLAN documents for at least 7 years.

Advocates must notify you when they receive a subpoena or court order. They must not act on them alone. You must notify us and handle each case based on your organization's policies.

Protective orders

Advocates helping sexual assault victims obtain a protective order must meet all of the requirements required by law to ensure confidentiality.¹⁷ If the advocate does not meet these requirements, they should explain the limits of confidentiality to the participant and can only help with:

- Filing protective order paperwork
- Addressing immediate safety concerns
- Making appropriate referrals to sexual assault counselors or agencies

L. SAFEPLAN training and certification

All SAFEPLAN advocates must meet the statutory requirements for "domestic violence victims' counselor." While only required for dual domestic and sexual assault organizations, we strongly encourage that all advocates also meet the statutory requirements for a "sexual assault counselor."

Certification criteria

Full- and part-time advocates, volunteers and interns must complete the following successfully to earn SAFEPLAN certification:

- At least 25 hours of legally required domestic violence training¹⁸
- If at a dual domestic and sexual violence organization,
- at least 35 hours of legal required sexual assault training¹⁹
- Any additional training required by your organization
- SAFEPLAN Certification Training
- At least 20 hours shadowing a certified advocate in court

SAFEPLAN Certification training

All staff who provide direct SAFEPLAN services must complete this training as scheduled by MOVA. This includes senior advocates, advocates, volunteers and interns. How it works:

¹⁷ [M.G.L. c.233 § 20J](#)

¹⁸ [M.G.L. c.233 § 20K](#)

¹⁹ [M.G.L. c.233 § 20J](#)

- The organization gets a “SAFEPLAN Certification – Advocate Status Form” for each new person
- The staff member has one year from the day they’re hired to complete the training
- You complete the form and send it to us when they’ve finished training and shadowing
- They receive their certification to provide services under organization supervision
- You maintain training records for all staff

Senior advocates

You must have one assigned senior SAFEPLAN advocate to provide staff oversight, coordination and be a liaison with MOVA. This advocate must meet the certification requirements above *and*:

- Have a minimum of 2 years of experience as a SAFEPLAN advocate

There are case-by-case situations where senior SAFEPLAN requirements may vary. You should discuss these with MOVA and request approval. Some examples include:

- There is only one SAFEPLAN advocate at your organization
- There is reason for multiple senior advocates to be providing oversight and coordination
- There are no SAFEPLAN advocates that have over 2 years of experience as a SAFEPLAN advocate

Ongoing certification

Full- and part-time advocates must meet these criteria to keep their certification:

- Be employed at a SAFEPLAN host organization
- Have regularly scheduled one-to-one direct service supervision by the organization
- Provide court-based services at least 12 hours per year
- Attendance at quarterly regional meetings and continuing education series hosted by MOVA
 - Advocates are expected to attend these meetings except under extraordinary circumstances. You must let us know if an advocate can’t attend a required meeting. We will address attendance on a case-by-case basis.

Meeting victims needs

Consider local cultural and linguistic needs when hiring staff or contracting for services.

APPENDIX B: Policies and Procedures Update Table

Date	Change	Explanation
6/13/2022	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 Appendix C and created separate document (Allowable and Unallowable cost examples).	Updates apply to FY23-current awards.
6/5/2023	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-current awards.
7/1/2024	Clarification of requirements of consultants and sub-contracts, funding attribution statement examples included, clarification of equipment and inventory tracking requirements, data pro-rating guidance included, policy regarding bonuses to funded employees added.	Updates apply to FY25-current awards.
7/1/2025	MOVA partnered with LanguageLine Solutions to convert existing grants manual into plain, accessible language. Honoring revisions to 2 CFR Part 200 effective October 1, 2024, thresholds increased: de minimus for indirect costs may be increased from 10% to 15%; threshold for tracking equipment increased from \$5,000 to \$10,000; single audit requirement increased from \$750,000 to \$1,000,000	CFR updates apply to FY25 and FY26 awards. All others apply only to FY26 awards.

APPENDIX C: Definitions

Organization- A non-profit or state agency that receives the grant funds from MOVA mentioned in this document.

Contract- We use the Commonwealth Standard Contract form to distribute grants. It's a legal agreement between MOVA and the grantee.

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

Culturally Specific- Primarily directed toward racial and ethnic minority groups. This term is based on the definition from the Public Health Services Act (Section 1707(g)) 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.

Indirect Cost- Costs that are not directly tied to a specific project activity.

Interdepartmental Service Agreement (ISA) - Agreement form utilized between two state agencies in Massachusetts.

Massachusetts Management, Accounting, and Reporting System (MMARS)- The official accounting system used by the Commonwealth of Massachusetts Comptroller.

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

Outcome Measurement Tool (OMT)- MOVA’s data collection tool used to evaluate funded services by measuring outcomes and service effectiveness, and to ensure that we are effectively awarding funding to support the needs of victims/survivors

Sub-Contract- An agreement between an organization and a third party to provide some or all of the needed services, or operates a program on behalf of a contractor.

Grantee- The recipient of grant funding from MOVA.

Sub Award Report (SAR) – Office for Justice Programs (OJP) required grantee report which includes financial detail of organizations that receive federal funding from MOVA. 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 seven members, including two District Attorneys, four public/survivor members, and chaired by the Attorney General.