



Issue Date: October 2019  
Revised Date: October 2023

Massachusetts Office for Victim Assistance (MOVA)  
Match Waiver Policy and Procedure

### **Purpose and Scope**

Victims of Crime Act (VOCA) regulations require subrecipients to contribute to the total cost of their 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 reserves the right to use state and/or federal funds to support a grant award and apply this requirement for all subrecipients of all grants administered by MOVA.

Partial and full match waiver requests will be considered and approved by the State Administering Agency (SAA), MOVA. MOVA is authorized to initiate 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 approval is required for any match waiver requested by a subrecipient.

MOVA abides by the [current OVC guidance](#) issued on September 20, 2021.

### **Overview**

Both MOVA initiated match waivers and subrecipient match waiver requests are to be 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

### **Subrecipient Wavier Requests**

Subrecipients requesting a match waiver must do so as instructed by MOVA, for each applicable award. Approval of a match waiver does not extend to other awards. Match waiver requests may be submitted during the application period (as outlined in the applicable Request for Grant Applications (RGA) or at any time during the grant cycle. Match waivers (full or partial) must be justified if requested outside of a national emergency period and mandatory or blanket match waivers are not in effect.

### **MOVA Waivers**

Pursuant to the [VOCA Fix to Sustain the Crime Victims Fund Act of 2021](#), MOVA may automatically waive match requirements for subrecipients during a national pandemic period or other qualifying circumstances. 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.

MOVA may issue a match waiver during the application period or at any other time during the grant cycle. In the event of a 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 match waiver may be stated in the applicable RGA. Subrecipients will have the ability to accept or decline the match waiver. A determination letter inside the award letter and contracting section of eGrants, MOVA's electronic grants management system, will denote MOVA's final approved match waiver percentage and serve as notification of MOVA's decision to issue the match waiver.

### **National Emergency Pandemic Match Waivers**

The VOCA Fix states in part: "Beginning on the date a national emergency is declared under the National Emergencies Act (50 U.S.C. § 1601 et seq.) with respect to a pandemic and ending on the date that is one year after the date of the end of such national emergency, State Administering Agencies shall issue waivers for any matching requirement, in its entirety, for all eligible crime victim assistance programs contracted to provide services at that time." 34 U.S.C. 20103(a)(8).

As a result of this provision, MOVA will honor all match waivers issued during the time of a national emergency until the expiration occurring one year after the end of a national emergency. New subawards or continuations made on or after one year after the end of the national emergency, will no longer qualify for mandatory match waiver. The extended match waiver deadline also applies to subrecipients in receipt of state funds. Match waiver requests falling outside of the national emergency timeframe will be considered under the ordinary match waiver process outlined above.

In times of national emergency, match waivers will be reviewed and acted upon as follows:

- During a national emergency period, MOVA will issue automatic match waivers. Subrecipients may indicate their decision to accept or opt out of the automatic match waiver via the applicable grant application. No further justification beyond the fact that match is subject to mandatory waiver during national emergencies will be required.
- A determination letter inside the award letter and contracting section in eGrants will denote MOVA's final approved match percentage and serve as notification of MOVA's decision to issue the national emergency match waiver. MOVA will honor a subrecipient's decision to opt out of the national emergency match waiver.

### **Additional Requirements**

MOVA shall submit to OVC via upload to JustGrants, Grant Award Modification (GAM) or other method, as requested by OVC, a match waiver spreadsheet listing all subrecipient match waivers approved in a federal fiscal year, for each relevant federal award, no later than 120 days after fiscal year end. Determinations will be entered into the match waiver spreadsheet on a rolling basis, within 90 days of match waiver approval.

Upon approval by OVC, MOVA's Match Waiver Policy will be posted to the [MOVA website](#) for public access. Any revisions to the policy will be updated on MOVA's website.

### **Policy Testing**

A designated staff member on the grants administration team will be responsible for ensuring that the above policy is reviewed, adhered to, and updated. Review will occur on six-month intervals or at the discretion of the Director of Grants Administration or designee.

If the match waiver policy is changed or updated, MOVA will submit a revised policy to OVC within 30 days of change. OVC approval of revised match waiver policy will be obtained prior to use of new policy.

This policy may be updated at any time to reflect and comply with relevant amendments in federal and/or state policies and regulations.

**Approved by: Liam Lowney, Executive Director**

### **Match Waiver Policy Update Table**

Date	Reference	Change	Explanation
June 2020	March 2020 Updates to OVC Match Waiver Approval Process	"Unique circumstances" language added to include flexibility for match waiver approvals outside of application period	Unique circumstances allowed by OVC. See Reference: "March 2020 Updates to OVC Match Waiver Approval Process"
October 2023	OVC September 2020 Policy Update and End of National Emergency	"Unique circumstances" language expanded; clarification of blanket waivers; national emergency pandemic match waivers section added	Under OVC's revised Match Waiver Approval Process, OVC clarified that SAAs may issue blanket match waivers on behalf of all subrecipients with reasonable and adequate justification pursuant to their policies. Guidance on the national emergency pandemic waiver requirement was added in compliance with OVC's revised Match Waiver Approval Process and the VOCA Fix.