

VOCA Match Waiver Policy & Procedure

Revised 2.29.2024

Effective 10.1.24

Introduction:

The State of Michigan's VOCA Match Waiver Policy was developed pursuant to Office for Victims of Crime (OVC)'s communication dated June 27, 2019 and in compliance with 28 C.F.R. 94.118(b)(3). The following is Michigan's VOCA Grant Match Waiver Policy.

Where possible, the Michigan Department of Health and Human Services (MDHHS) Division of Victim Services (DVS) will encourage VOCA sub-recipients to meet matching requirements. DVS VOCA staff will continue to provide appropriate monitoring of compliance with matching requirements throughout the subaward period.

Match requirements are automatically waived for subrecipients that are federally recognized American Indian or Alaska Native tribes, or projects that operate on tribal lands.

Match Waiver Policy Overview:

This match waiver policy will be posted on the DVS website. There are two standard types of match waivers:

(A) Waivers initiated by DVS, (p.2) and

(B) Waivers requested by subrecipient if DVS does not initiative a waiver (p.3)

Grantees will be informed annually whether, DVS has initiated a waiver or whether grantees will be required to individually request a waiver. Subrecipients are not penalized for inquiring about, seeking, and/or receiving reasonable and justified match waivers. Waivers are only applicable for the duration of the subaward and are not in perpetuity.

A. Waivers Initiated By DVS

The Michigan Division of Victim Services can initiate Match Waivers either on an individual project, multi-project, or a waiver for a class(es) of subrecipients. DVS-initiated Match Waivers will be used when unique circumstances such as the following exist.

- Natural Disasters
- Pandemics or other geographic health crisis
- Mass violence/victimization events
- Other events as determined by DVS Grants & Contracting Director.

Subrecipients may decline the waiver and voluntarily provide match.

Procedure:

1. DVS Grants & Contracting Director determines that one of the above unique circumstances exists.
2. Continuation Grants:
 - a. Match waiver notices will include (i) match determination, (ii) justification, (iii) calculation for the amount waived, and (iv) effective dates.
 - b. Subrecipients will be notified during the annual allocation process via:
 - i. EGrAMS.
 - ii. Email.
3. RFPs will include documentation that a DVS initiated match waiver is in effect.
4. Grantees wishing to decline match waiver and voluntarily provide match must notify DVS.
5. The DVS Grants & Contracting Director or designee will update the SAR in the Performance Measurement Tool (PMT) System within 45 days to reflect the Match Waiver and make any other adjustments within 30 days.
6. The DVS Grants & Contracting Director or designee will submit to OVC a match waiver spreadsheet (using the revised OVC template) listing all subrecipient match waivers approved in a federal fiscal year for each relevant federal award by no later than 120 days after fiscal year end. This will be submitted to OVC via a Grant Award Modification (GAM) uploaded to JustGrants or in another method as requested by OVC.

B. Waivers Requested by Subrecipient (only necessary if DVS has not initiated a waiver)

Subrecipients may submit full or partial match waiver requests using the procedure below.

Procedure:

1. Match Waiver Request Form can be found on the DVS website, or may be requested via email to MDHHS-DVS@michigan.gov. The Match Waiver Request Form requires the following information:
 - a. How is the grant currently being matched?
 - b. What extenuating circumstances exist that impede the organization's ability to partially or fully match the VOCA grant funds requested?
 - c. Has the organization considered all possible options for meeting the match with in-kind and cash sources that are not being used as match on another federal grant?
 - d. What methods has the organization used to consider all possible options for meeting the match requirements?
 - e. What steps does the organization plan to take in order to be able to meet the match requirement in the future?
 - f. If a match waiver is approved, does the organization anticipate this is a one-time request or are there extenuating circumstances that will require a waiver request next year?
 - g. How would the denial of a match waiver impact the VOCA project?
 - h. Would the program have to decline all or part of the grant award if a match waiver is not granted?
 - i. Please list the sources of financial support available to the sub-recipient program outside of the Crime Victims Fund.
2. Match waivers, whether partial or full, must be well justified by the applicant. DVS Grants & Contracting Director or designee will review requests and notify subrecipients of the match waiver determination within 30 days of receipt of a request from a subrecipient.
3. DVS Grants & Contracting Director or designee will consider the following when making match waiver determinations:
 - a. Practical and/or logistical obstacles to providing match (e.g., public agencies that do not engage in private fundraising and may have limitations on soliciting contributing funds);
 - b. Local resource constraints (e.g., rural community with limited local funding availability or volunteer capacity);
 - c. Increases to VOCA funding where local funding availability has not increased to the same degree;
 - d. Past ability to provide match – DVS and OVC generally expects sub-recipients to provide at least the same dollar amount of match it provided during the grant year immediately preceding the year of the waiver request unless a change in circumstances justifies a lower amount.

4. Once a match waiver determination is made by the DVS Grants & Contracting Director or designee, the determination notice will be emailed to the subrecipient and uploaded to the Organizational Information in DVSGMS. The approved match waiver will contain the following:
 - a. A brief description of the project/services provided by subrecipient;
 - b. The justification (consistent with the considerations under the applicable waiver guidance);
 - c. The scope of the waiver, and waiver amount and the DVS match waiver determination.
5. Waivers will only be applicable for the period identified on the match waiver determination notice.
6. The DVS Grants & Contracting Director or designee will submit to OVC a match waiver spreadsheet (using the revised OVC template) listing all subrecipient match waivers approved in a federal fiscal year for each relevant federal award by no later than 120 days after fiscal year end. This will be submitted to OVC via a Grant Award Modification (GAM) uploaded to JustGrants or in another method as requested by OVC.