



**RHODE ISLAND DEPARTMENT OF PUBLIC SAFETY
PUBLIC SAFETY GRANT ADMINISTRATION OFFICE**

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VOCA MATCH WAIVER POLICY

The Rhode Island Public Safety Grant Administration Office's (PSGAO) VOCA Match Waiver Policy was developed pursuant to Office for Victims of Crime (OVC)'s guidance and in compliance with 28 C.F.R. 94.118(b)(3). The following policy which will be implemented after Office for Victims of Crime (OVC) approval. If this policy changes the PSGAO will submit within 30 days of the change a GAN requesting OVC review of the revised VOCA Match Waiver policy before implementation of the revised policy. Under unique circumstances the PSGAO may revise this policy with prior consultation with the OVC Grant Manager and will submit the revised policy by the end of the fiscal year, or upon request by the Grant Manager.

Where possible, the PSGAO will encourage VOCA sub-recipients to meet matching requirements. VOCA staff will continue to provide appropriate monitoring of compliance with matching requirements throughout the subaward period.

Match waivers, both in full and in part, are required to be justified by the time the VOCA subgrant is awarded. Under unique circumstances (including but not limited to an event such as a natural disaster or public health crisis) the PSGAO may offer additional opportunities to request match waivers as needed.

The applicant requesting a match waiver must answer the following questions to be considered:

1. How is the grant currently being matched?
2. What extenuating circumstances exist that impede the organization's ability to partially or fully match the VOCA grant funds requested?
3. 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?
4. What methods has the organization used to consider all possible options for meeting the match requirements?
5. What steps does the organization plan to take in order to be able to meet the match requirement in the future?
6. 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?
7. How would the denial of a match waiver impact the VOCA project?
8. Would the program have to decline all or part of the grant award if a match waiver is not granted?
9. Please list the sources of financial support available to the sub-recipient program outside of VOCA.

Match waivers, whether partial or full, must be well justified by the applicant. VOCA staff will review these answers during the application review process and/or during the designated waiver review period and will make a recommendation to the Administrative Manager prior to beginning of the issuance of a grant award or within 30 days of receipt of a request from a sub-recipient. VOCA staff and the Administrative Manager will determine whether to grant a partial or full match waiver.

VOCA Staff will consider the following when deciding whether to approve a match waiver request:

1. Practical and/or logistical obstacles to providing match (i.e. public agencies that do not engage in private fundraising and may have limitations on soliciting contributing funds);

2. Local resource constraints (i.e. rural community with limited local funding availability or volunteer capacity);
3. Increases to VOCA funding where local funding availability has not increased to the same degree;
4. Past ability to provide match – PSGAO 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.

Once the grant is awarded and a match waiver is approved, a match waiver determination notice will be emailed to the subrecipient with instructions to keep a copy in their grant file. A new award document will be issued, if necessary. The match waiver determination notice will contain the following:

1. A brief description of the project/services provided by subrecipient;
2. The justification (consistent with the considerations under the applicable waiver guidance);
3. The scope of the waiver, and waiver amount (unless specified otherwise by the PSGAO, the waiver amount should create an equivalent match waiver percentage to be applied should the project budget change); and
4. The PSGAO approval of the waiver request for the reasons set out in the determination.
5. The signature of the Administrative Manager.

Waivers will only be applicable for the duration of the subrecipient's project (i.e. not in perpetuity).

VOCA staff will submit the match waiver determinations to OVC via a Program Office Approval GAN in GMS, within 90 days following the end of the fiscal year. Determinations will be submitted, in bulk whenever feasible, to the appropriate federal award that is being used to fund the subgrant containing the match waiver. The PSGAO will submit the match waivers via a match waiver spreadsheet, showing all active waivers approved in a federal fiscal year based on final actual grant expenditures, no later than 90 days after the fiscal year end.

Prior OVC approval will not be required for any match waiver requested unless the request is made within 30 days of the subaward end or after that date. Any request for a match waiver, or modification of a match waiver, within or after 30 days of the subaward end date will be forwarded promptly to OVC. The PSGAO anticipates any match waiver requested by a subrecipient in this circumstance would only be granted in cases of emergency or other unique circumstances.

The PSGAO agrees to apply the approved match waiver percentage in (or derived from) the original waiver request to a subrecipient's modified budget to determine the new match waiver dollar amount.



Michael Hogan, Administrative Manager

9/4/2020
Date