



KANSAS GOVERNOR'S GRANTS PROGRAM VICTIMS OF CRIME ACT MATCH WAIVER POLICY

The policy of the Kansas Governor's Grants Program (KGGP) is to encourage Victims of Crime Act (VOCA) Subgrantees to meet match requirements. The KGGP staff provide appropriate monitoring of compliance with matching requirements throughout each grant period.

Match waivers, full and partial, are required to be justified either at the time the VOCA grant application is submitted or during the grant project period if the Subgrantee is unable to sustain the match requirement. A match waiver request, in full or in part, by the VOCA applicant must provide written responses to the following questions before a match waiver will be considered:

1. How is the match currently being provided?
2. What extenuating circumstances exist impeding 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 Subgrantee 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 requirements 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 organization's VOCA grant project and would it require the organization to decline all or part of the grant award if a waiver is not granted?

The Analyst reviews the responses during the application review process or during the grant project period. The Analyst prepares the Match Waiver Determination Form and forwards the Determination Form and the Subgrantee's responses to the above questions to the Administrator. The Analyst's recommendation is included on the Determination Form and the Administrator makes the final approval for the match waiver.

Match waivers, whether in full or in part, must be well justified by the applicant or Subgrantee. The Analyst and Administrator 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. Efforts by Subgrantee to explore and secure both cash and in-kind match sources; and
5. Past ability to provide match: The KGGP and the Federal Office for Victims of Crime (OVC) generally expects Subgrantees 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.

The Match Waiver Determination Form will contain the following:

1. A brief description of the project/services provided by the Subgrantee;
2. The match waiver decision;
3. The justification for the decision (consistent with the considerations under the applicable waiver guidance);
4. If approved, the scope of the waiver, and waiver amount (unless specified otherwise by the KGGP, the waiver amount should create an equivalent match waiver percentage to be applied should the project budget change); and
5. The signature of the Administrator and the Analyst.

Waivers will only be applicable for one grant award period. A waiver request must be submitted with each VOCA grant application or grant award.

Current Grant Award Request

After the match waiver is considered and the Determination Form is signed, the Analyst will proceed as follows based on the decision.

Denied match waiver requests:

1. The Analyst will send an email (following attachment A template) to the Subgrantee containing the match waiver request determination to deny and a brief explanation; and
2. The Analyst will forward the signed Determination Form, any accompanying documentation, and a copy of the email correspondence to the Financial Officer.

Approved match waiver requests:

1. The Analyst will send an email (following attachment B template) to the Subgrantee containing the following information:
 - a. The scope of the waiver, and waiver amount; and
 - b. Requirement of the Subgrantee to submit a revised budget in the Grant Portal; and

2. The Analyst will forward the signed Determination Form, any accompanying documentation, and a copy of the email correspondence to the Financial Officer.

Pending Application Request

The approval notification of an applicant's match waiver request will be incorporated into the grant award documents, specifically the Grant Assurances will reflect the reduced match amount based on the scope and amount of the waiver. The Analyst will forward the signed Determination Form and any accompanying documentation to the Financial Officer prior to the distribution of award notices. An applicant's match waiver request will only be considered if the applicant is awarded a grant.

Financial Officer's Procedures

The Financial Officer will update the required spreadsheets, Blackbaud Grantmaking, and grant file, and will file the waiver documentation in the Subgrantee folder behind the Grant Assurances. The Financial Officer will submit the match waiver determinations to OVC via a Program Office Approval Grant Adjustment Notice in the Grant Management System, within 30 days of approval. Determinations will be submitted, in bulk, to the appropriate federal award that is being used to fund the subgrant containing the match waiver.

The Financial Officer will submit the match waiver spreadsheet using the OVC template, showing all active waivers approved in a federal fiscal year, no later than 120 days after the fiscal year end.

OVC Approval

Prior OVC approval will be required for any match waiver requested by a Subgrantee within 30 days before the subaward project end date, or after that date. The KGGP anticipates this would only occur in the event of an emergency.

National Emergency Pandemic Match Waiver

In compliance with the federal statute effective July 22, 2021, referred to as “The VOCA Fix” (34 U.S.C. 20103), and the corresponding guidance published by OVC on September 20, 2021, the KGGP will issue waivers for any unmet matching requirement, in its entirety, for eligible VOCA Subgrantees beginning August 1, 2021, and through a date that is one year after the end of the national emergency pandemic. The national emergency pandemic match waiver policy will apply whenever a national emergency is declared under the National Emergencies Act with respect to a pandemic and end on the date that is one year after the end of the national emergency.

The KGGP will provide a self-initiated automatic match waiver for all current Subgrantees effective August 1, 2021, and for new subgrant awards issued on or after August 1, 2021, during the national emergency pandemic period. For VOCA subgrant awards open and active on August 1, 2021, the Financial Officer will send an email communication within 10 business days of the publication of the OVC guidance, to VOCA Subgrantees with the following information: 1) Amount of match

being waived; 2) Justification for the waiver is due to the national emergency pandemic; and 3) Instructions about revising the agency's budget. During the remainder of the national emergency pandemic period this information will be included in the award documentation. Subgrantees will have the option to decline the automatic match waiver.

The Financial Officer will report the match waiver information to OVC no later than 120 days following the close of the federal fiscal year.

At the conclusion of a national emergency pandemic period, the KGGP will honor all match waivers granted during that period until the end of the VOCA subaward period for which match was waived. VOCA subawards made after the end of that period will no longer qualify for an automatic match waiver and any match waiver requests for those subawards will be considered and processed under the ordinary match waiver process outlined above.

Public Notification

In compliance with The VOCA Fix, this policy is publicly available on the KGGP website and in the VOCA solicitations.



Policy Approved by KGGP Administrator

Policy Adopted on March 25, 2020

Revised on June 5, 2020

Revised on August 12, 2020

Revised on September 27, 2021

Attachment A
Denied Match Waiver Requests

Subject: Match Waiver Request for <List All Grant Project Numbers>

<Primary Contact>

<Organization Name>

<Organization Address>

RE: <Grant Project Number>

Dear <Primary Contact Prefix & Last Name>:

The agency's Match Waiver Request, received by the Kansas Governor's Grants Program (KGGP) on <Date(s)>, has been denied. After careful consideration, the KGGP has determined the justification provided to document the agency's inability to meet match requirements was insufficient to warrant a match waiver at this time. In summary, <insert brief summary of the "Justification for Decision" response on the Match Waiver Determination Form>.

Do not hesitate to contact me if you have any questions or if I can be of further assistance.

Sincerely,

Attachment B
Approved Match Waiver Requests

Subject: Match Waiver Request for <List All Grant Project Numbers>

<Primary Contact>
<Organization Name>
<Organization Address>

RE: <Grant Project Number>

Dear <Primary Contact Prefix & Last Name>:

The agency's Match Waiver Request, received by the Kansas Governor's Grants Program (KGGP) on <Date(s)>, has been approved. After careful consideration, the KGGP has determined the justification provided to document the agency's inability to meet match requirements was sufficient to warrant a match waiver reducing the required grant project match to <match percentage share of project>. No later than <Date(s)>, please revise the budget in the Grant Portal to reallocate <\$xxx> of match dollars to a new line item in the Other Budget Category titled "*Waived Match*." The Subgrantee understands the funds reallocated to the "*Waived Match*" line item will not be reported on the monthly Financial Status Reports and may be left as an unexpended balance at the end of the grant project period. Prior to submitting the budget revision, please upload a copy of this email to the Attachments tab in lieu of the required budget revision Justification Letter.

Do not hesitate to contact me if you have any questions or if I can be of further assistance.

Sincerely,