



# FEDERAL SEXUAL ASSAULT SERVICES GRANT PROGRAM (SASP)

KANSAS GOVERNOR'S GRANTS PROGRAM  
GRANT ASSURANCES TRAINING

FEBRUARY 2024



# SASP Assurances

**PRESENTED BY**  
ERICA HAAS, ATTORNEY

# Victim Safety

- Safety is the guiding principle that underlies the SASP grant programs.
- Subgrantees' goals and services are required to reflect victim safety.

# Confidentiality

- Policies and procedures are in place to ensure confidentiality of records of individuals receiving SASP-funded services.
- Disclosure of personally identifying information - signed informed time-limited written release
  - Statute
  - Court Order
- Follow all state and federal laws pertaining to confidentiality
  - [34 U.S.C. 12291 \(b\)\(2\)](#)

# Dissemination of Crime Victims' Rights Information

- Subgrantees are required to provide crime victims' rights information to crime victims.
  - Statutory rights of crime victims
  - Crime victim compensation
- SASP-funded staff and volunteers shall receive information and training on crime victim compensation and on all applicable laws pertaining to crime victims' rights.

# Direct Intervention/Allowable Activities

- The purpose of SASP is to provide direct intervention to victims of sexual violence.

| Allowable activities  | Unallowable activities  |
|---|---|
| <ul style="list-style-type: none"><li>• 24-hour crisis line services</li><li>• Medical and criminal justice/civil legal accompaniment</li><li>• Advocacy</li><li>• Short-term individual and group support counseling</li></ul> | <ul style="list-style-type: none"><li>• Prevention education efforts</li><li>• Projects focused on training allied professionals and/or communities</li><li>• The establishment or maintenance of Sexual Assault Response Teams</li></ul> |

# SASP Direct Victim Assistance

- “Direct Assistance to Victims” funds are only for the immediate health and safety of sexual assault victims.
- Written documentation to support the use of these funds for this purpose must be maintained.
- No direct payments to victims or a dependent of any victim.
- Gift cards cannot be provided directly to victims as a substitute for cash.

# Compromising Victim Safety

Subgrantees shall not use grants project funds to support activities that may compromise victim safety and recovery or undermine offender accountability, such as:

- Procedures/policies that exclude victims from receiving services based on actual or perceived sex, age, immigration status, race, religion, sexual orientation, gender identity, mental/physical health condition, criminal record, work in the sex industry, or age/sex of children;
- Procedures/policies that compromise confidentiality;
- Procedures/policies that impose requirements on victims to receive services;
- Procedures/policies that fail to ensure staff conduct safety planning with victims; and
- Project design and budgets that fail to account for access needs of participants with disabilities, limited English proficiency, or are Deaf.



# Workplace-Related Incidents

Subgrantee must have a policy in place within 270 days of the date of the award to address workplace-related incidents of:

- Sexual misconduct;
- Domestic violence; and
- Dating violence.

\*Hereinafter referred to as “violence.”

The Subgrantee shall refer to [Policy for Response to Workplace-Related Incidents](#) for details of this condition.

# Workplace-Related Incidents

The policy must address the following:

- Allegations of workplace-related incidents of violence by an employee, volunteer, consultant, or contractor;
- Workplace supports for employees, volunteers, consultants, or contractors who are victims of violence; and
- Adjudications that will result in an employee, volunteer, contractor, or consultant being prohibited from occupying positions that could undermine the ability of the subgrantee to carry out the grant funded project.

# Workplace-Related Incidents

## Special Condition

- Submit the agency's Workplace Related Incidents policy
- A checklist is available on the KGGP website. [Workplace-Related Incidents Checklist](#)
- Additional resource:

[Workplaces Respond - Resources for OVW Grantees](#)

# Program Income

- Subgrantees are not allowed to generate program income unless written approval is first received from KGGP

# Copyright

- The Office on Violence Against Women reserves a royalty-free, nonexclusive, and irrevocable license to reproduce, publish, or otherwise use and to authorize others to use, in whole or in part, for Federal Government purposes:
  - Any work subject to copyright developed under a SASP subgrant; and
  - Any work subject to copyright for which ownership was purchased with support of a SASP subgrant.
- Written approval required before using SASP funds to purchase ownership/license to use a copyrighted work; or incorporating any copyrighted work into a new work developed under this award.

# Computer Networks

- Funds must not be used to maintain or establish a computer network unless such network blocks viewing, downloading, and exchanging of pornography.
- Does not limit the use of funds for carrying out criminal investigations, prosecution, or adjudication activities.

# Civil Rights and Nondiscrimination

VAWA Reauthorization Act of 2013:

No person in the United States shall, on the basis of actual or perceived race, color, religion, national origin, sex, gender identity (as defined in 18 U.S.C. §249(c)(4)), sexual orientation, or disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with funds made available under [VAWA], and any other program or activity funded in whole or in part with funds appropriated for grants, cooperative agreements, and other assistance administered by the Office on Violence Against Women.

# Civil Rights and Nondiscrimination

VAWA Reauthorization Act of 2013 (*continued*):

If sex segregation or sex-specific programming is necessary to the essential operation of a program, nothing in this paragraph shall prevent any such program or activity from consideration of an individual's sex.

In such circumstances, Subgrantees may meet the requirements of this paragraph by providing comparable services to individuals who cannot be provided with the sex-segregated or sex-specific programming.

*The Office for Civil Rights (OCR) has posted FAQs on the VAWA nondiscrimination provision at: [OCR VAWA Nondiscrimination Provision FAQs](#)*



# Civil Rights and Nondiscrimination

VAWA Reauthorization Act of 2013 (*continued*):

- Sex-Segregated Programming
  - When males and females receive services in separate settings
- Sex-Specific Programming
  - When a recipient designs programming differently for males and females

Beneficiaries choose the appropriate program based upon gender identity

# Civil Rights and Nondiscrimination

VAWA Reauthorization Act of 2013 (*continued*):

- Necessary to the Essential Operation of a Program --Fact-specific inquiry, consider:
  - Nature of the services
  - Consequences to beneficiaries of making sex-segregated or sex-specific
  - Literature on efficacy
  - Impact on transgender clients

Reasons may not be trivial, based solely on convenience, or rooted in stereotypes

# Civil Rights and Nondiscrimination

VAWA Reauthorization Act of 2013 (*continued*):

- Comparable Services
- Fact specific inquiry, consider:
  - Nature, quality, and duration of the service;
  - Relative benefits of different therapeutic modalities; and
  - Geographic location.

# Civil Rights and Nondiscrimination

VAWA Reauthorization Act of 2013 (*continued*):

- What is Gender Identity?
  - “Actual or perceived gender-related characteristics”  
(from Matthew Shepard – James Bird Hate Crime Prevention Act)
  - A person’s internal view of the individual’s gender
  - May or may not correspond to sex assigned at birth

# Civil Rights and Nondiscrimination

VAWA Reauthorization Act of 2013 (*continued*):

- Serving Transgender Clients
  - Assign clients to service which corresponds to the gender with which the client identifies
  - Consider transgender victim's health and safety in making housing assignments
  - Transgender client's own views regarding personal safety deserve serious consideration
  - Do not isolate or segregate
  - Do not make burdensome demands for identity documents
  - Do not inquire into surgery or other medical interventions

# KGGP Website

Visit the KGGP website at  
[www.grants.ks.gov](http://www.grants.ks.gov)  
for information on grant management.

- Grant Opportunities
- Resources – Managing a Grant Award\*
- Resources – Civil Rights Information
- Kansas Academy for Victim Assistance (KAVA)



**Kansas Governor's Grants Program**

**[kggp@ks.gov](mailto:kggp@ks.gov)**

**Voice: 785-291-3205**

**Fax: 785-291-3204**

**Primary Contact: KGGP Analyst contact information in  
grant award notice**

**[SASP Grant Assurances Training Link](#)**