



STATE OF ARKANSAS
**Department of Finance
and Administration**

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VOCA Match Waiver Policy

The policy of the Arkansas Department of Finance and Administration – Office of Intergovernmental Services (DFA-IGS) is to encourage VOCA subrecipients to meet matching requirements. Sources of project match shall be derived from non-federal sources, except as provided in the DOJ Financial Guide. Examples of match may include, but are not limited to: cash, volunteered professional or personal services, materials/equipment, space and facilities, and non-VOCA funded victim assistance activities. DFA-IGS VOCA grant staff provides technical assistance and monitoring of compliance with matching requirements throughout the subaward period.

Every VOCA-funded agency has the right to request a match waiver; however, a match waiver request should only be requested in extenuating circumstances. Requesting a match waiver should be the last resort for any VOCA-funded agency. The VOCA-funded agency considering a match waiver request should work with DFA-IGS staff to identify all possible avenues for match funding before submitting a request for a match waiver. If after a review of all possible match funding opportunities it is determined that the match amount cannot be met, then and only then will the agency be encouraged to submit a match waiver request.

I. VOCA Waiver Request

Match waiver requests, both in full and in part, are normally required before the VOCA grant period start date. However, special consideration will be made during the grant period for “unique circumstances”, such as a mass violence incident, natural disaster, or other federally or state-declared epidemic or pandemic. Should a match waiver be requested, the VOCA applicant must answer the following questions before a match waiver will be considered.

- 1) How is the grant currently being matched?
- 2) What extenuating circumstance(s) exist that impede the organization’s ability to partially or fully match the VOCA grant funds requested? (Explain in great detail.)
- 3) Has the organization considered all possible options for meeting the match with in-kind and cash sources that are not being used as a match on another federal grant? Please give a detailed description.
- 4) Aside from working with DFA-IGS, what other methods have the organization used to consider all possible options for meeting the match requirements?
- 5) What steps does the organization plan to take to meet the match requirement in the future?
- 6) If a match waiver is approved, does the organization anticipate that this is a one-time request or will there be extenuating circumstances that will require a waiver request next year? Why?
- 7) How would the denial of a match waiver impact the VOCA-funded project? Why?
- 8) Would the program have to decline all or part of the grant award if a match waiver is not granted?
- 9) What percentage of match can the program currently meet?

Requests should be submitted to the Victim Justice Assistance (VJA) Grants Manager on letterhead and signed by the highest-ranking official of the applicant organization. DFA-IGS staff will review the request during the application review process and make recommendations before awarding grant funds. DFA-IGS will determine whether to grant a partial or full match waiver with the review and recommendation of the Office of Victims of Crime (OVC) Program Manager and/or VJA Advisory Board.

II. DFA-IGS Considerations

Match waivers, whether partial or full, must be well justified by the applicant. DFA-IGS will consider the following when deciding whether or not to approve a match waiver request.

1. 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);
2. Local resource constraints;
3. Increases to VOCA funding where local funding availability has not increased to the same degree;
4. Past ability to provide match. DFA-IGS and OVC generally expect subrecipients 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 only exception to this rule will be the grant year proceeding the end of the COVID-19 National Pandemic VOCA Match Waiver.

III. Waiver Notification

Once the grant is awarded and a match waiver is approved, a Match Waiver Determination Form will be placed in the applicant's file. The Match Waiver Determination Form will contain the following:

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

Waivers will only be applicable for the duration of the subrecipient's project and not in perpetuity.

DFA-IGS will submit each match waiver to OVC within 30 days after its approval.

DFA-IGS will also submit a match waiver spreadsheet, using the OVC template, showing all active waivers approved in a subgrant period, no later than 90 days after the end of the fiscal year.

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

DFA-IGS 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.

All match waivers must be approved and signed by DFA-IGS's Assistant Administrator.