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Match Waiver Policy Implementation Date: March 1, 2020

The policy of the Vermont Center for Crime Victim Services (CCVS) is to encourage subrecipients to meet matching requirements. The Center's grant management staff provides appropriate monitoring of compliance with matching requirements throughout the subaward period.

Match waivers, both in full and in part, are required to be justified at the time the grant application is submitted. Should a match waiver be requested in full or in part, the applicant must answer the following questions before a match waiver will 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 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 steps does the organization plan to take in order to be able to meet the match requirement in the future?
- 5. 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?
- 6. How would the denial of a match waiver impact the project?

The financial and grant managers review the answers during the application review process and make a recommendation to CCVS Center Executive Director prior to awarding grant funds. The Center's Executive Director determines whether to grant a partial or full match waiver.

Match waivers, whether partial or full, must be well justified by the applicant. The Executive Director 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 (*e.g.*, rural community with limited local funding availability or volunteer capacity);



- 3. Increases to federal funding where local funding availability has not increased to the same degree;
- 4. Past ability to provide match CCVS 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.

Once the grant is awarded and a match waiver is approved, a match waiver determination notice will be generated and will be uploaded to the subgrantees' file. 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 CCVS, the waiver amount should create an equivalent match waiver percentage to be applied should the project budget change); and
- 4. CCVS 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 award period (i.e. not in perpetuity)

The Center for Crime Victim Services will submit the match waiver determinations to our funders via a Program Office Approval GAN in GMS, 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 Center will submit the match waiver spreadsheet, using the template/s required by the funding source, showing all active waivers approved in a federal fiscal year, no later than 90 days after the fiscal year end.

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

The Center 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 CCVS Executive Director.

This Match Waiver Policy has been adopted this 1st day of March, 2020.

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Chris Fenno, Executive Director