

Updated STOP FAQs

THURSDAY, NOVEMBER 30TH, 2017

OFFICE ON VIOLENCE AGAINST WOMEN (OVW)

Webinar agenda

- Introduction
- Highlighting changes to STOP FAQs
- Questions?

Note re: section renumbering

Most of our statutes have been renumbered to title 34 U.S. Code.

The STOP Statute is now 34 U.S.C. 10441, 10446-10451

When does this FAQ take effect?

It takes effect with the new regulations- meaning:

- For state grants, with the 2017 awards
- For subgrants with any subgrants that went out after December 29, 2016

Types of Services- Question 6

Can STOP funds support prevention programs?

Added the definition of "prevention" from 28 CFR 90.2(d):

The term "prevention" includes both primary and secondary prevention efforts. "Primary prevention" means strategies, programming, and activities to stop both first-time perpetration and first-time victimization. Primary prevention is stopping domestic violence, dating violence, sexual assault, and stalking before they occur. "Secondary prevention" is identifying risk factors or problems that may lead to future domestic violence, dating violence, sexual assault, or stalking and taking the necessary actions to eliminate the risk factors and the potential problem. "Prevention" is distinguished from "outreach," which has the goal of informing victims and potential victims about available services.

Types of Services – Question 17- new

Question: Can STOP funds support supervised visitation with children in cases involving domestic violence, dating violence, sexual assault, or stalking?

Answer: Yes. They may be funded through the court allocation if funds are awarded to a court, through victim services, or discretionary allocations.

Types of Services – Question 17 continued

Question: How are victims served counted in progress reports regarding supervised visitation?

Answer: Subgrantee would count the victim/parent as a victim served. Other information, such as numbers of custodial and noncustodial parents served, number of children, and number of visits could be reported in the narrative section of the progress report.

Financial Issues- Question 9

If income is generated through grant-funded activities, how should that income be used?

Program income, as defined by 2 CFR 200.80, means gross income earned by the non-federal entity that is directly generated by a supported activity or earned as a result of the federal award during the period of performance. Without prior approval from OVW, program income must be deducted from total allowable costs to determine the net allowable costs.

Financial Issues- Question 9, cont.

If income is generated through grant-funded activities, how should that income be used?

In order to add program income to the OVW award, the recipient must seek approval from its program manager via a budget modification Grant Adjustment Notice (GAN) prior to generating any program income. Any program income added to the federal award must be used to support activities that were approved in the budget and follow the conditions of the OVW award. Any program income approved via budget modification GAN must be reported in the recipient's quarterly Federal Financial Report SF-425 in accordance with the addition alternative. If the program income amount changes (increases or decreases) during the project period, it must be approved via a budget modification GAN by the end of the project period. If the budget modification is not submitted and approved, it could result in audit findings for the recipient.

Financial Issues- Question 9, cont.

Note new special condition language:

In order to add program income to a subaward, subrecipients must seek approval from the recipient prior to generating any program income. Any program income added to a subaward must be used to support activities that were approved in the budget and follow the conditions of the subaward agreement. Any program income approved by the recipient must be reported by the subrecipient to the recipient so that it is reported on the quarterly Federal Financial Report (SF-425) in accordance with the addition alternative. If the program income amount changes (increases or decreases) during the project period, the recipient must provide approval by the end of the project period. Failure to comply with these requirements may result in audit findings for both the recipient and the subrecipient.

Financial issues- question 13- use of admin funds

- Salaries
- Training
- Monitoring'
- Reporting
- Evaluation
- Audits
- Technology
- Memberships (but not lobbying)
- Publications and materials
- Strategic planning
- Coordination and collaboration
- General program improvements

Financial Issues – Question 14

Question: Can administrative funds support personnel who work on other federal or state grant programs in addition to STOP?

Answer: Yes, but the funding should be pro-rated according to the percentage of the time that the person works on STOP. For example, if a person works half of the time on STOP and the other half on a state program, then STOP could support half of the costs (salary and fringe) of that person

Financial Issues – Question 24

Question: Can STOP funds be used to “backfill” a position without violating the non-supplanting requirement? For example, if a police department wants to start a domestic violence unit with an experienced detective and then replace their previous position.

Answer: Yes. The key to determining whether this is unallowable supplanting is whether the violence against women capacity of the department increased or stayed the same.

Financial Issues – Question 24 continued

➤ The key to determining whether this is unallowable supplanting is whether the violence against women capacity of the department increased or stayed the same.

Example: If the city had been paying for the domestic violence detective, and now they are using STOP for that position and the funds that were previously paying for the position are now used for a traffic officer, then supplanting would have occurred because the domestic violence capacity of the department stayed the same.

Financial Issues – Question 25

Question: Can STOP funds be used to support the purchase of standard issued law enforcement items, such as uniforms, safety vests, shields, weapons, bullets, and armory?

Answer: No. STOP funds can only be used to purchase equipment specifically for the purpose of responding to or investigating DV, SA, dating violence, and stalking (e.g., cameras for documenting injuries)

Subgrant Management Issues – Question 2

Question: Can a state put a special condition on its subawards prohibiting activities that compromise victim safety?

Answer: Yes. STOP grant funds may not be used to support activities that compromise victim safety and recovery. States must ensure that subgrantees comply with this requirement and may do so by including a special condition regarding victim safety on subawards.

Subgrant Management Issues – Question 7

Question: Can a state use pass-through administration, such as using state domestic violence and sexual assault coalitions to make subgrant determinations and administer funding?

Answer: Yes. However:

- o States cannot use more than the 10% limit for administrative funds.
- o Reporting of activities at the subgrantee level must be equivalent to what would be provided if the state were directly overseeing the subawards.
- o An effective system of monitoring subawards is used.
- o States must report on the work of the pass-through entity as requested by OVW.

VAWA 2013 – Question 16

Question: What does “most significant” underserved populations and culturally specific populations mean?

Answer: The meaning of “most significant” will be different for each state. States must document in their implementation plan how they determined which underserved and culturally specific populations to include.

- States should consider demographic information about the state population (and also what groups may be missing from common sources of demographic information, such as U.S. Census data) and barriers to service, including historical lack of access to services for each population

VAWA 2013 – Question 19

Question: What does it mean to “meaningfully” consult with tribes and population-specific and culturally specific organizations?

Answer: The tribe or organization must have a genuine opportunity to shape the direction of the plan.

Questions?

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