

**SUMMARY OF CENTER QUESTIONS & ANSWERS (Q & A) – FY18 ICASA VOCA FUNDS**

**1. What costs are unallowable with VOCA funds?**

- a. Unallowable costs include:
  - i. Audits (applicable to agencies receiving less than \$750,000 in cumulative federal funds); **NOTE- There are conflicting messages in the technical assistance materials regarding allowability of audit expenses. We are advising all ICASA centers (regardless of whether they fall under the \$750K threshold) that it is allowable to include a proportionate share of audit expenses (based on your prior year’s VOCA allocation in comparison to total organization). As more clarity is gained, we will keep you updated on any changes.**
  - ii. Capital Expenses, including capital improvements, property losses and expenses, real estate purchases, mortgage payments, and most construction.
  - iii. Compensation for victims of crime
  - iv. Crime prevention
  - v. Food and beverage costs
  - vi. Fundraising activities
  - vii. Lobbying and advocacy with respect to legislation, regulations or administrative policy.
  - viii. Most medical costs
  - ix. Tort or criminal defense legal representation
  - x. Active investigation and prosecution of criminal activities
  - xi. Research and studies, except for project evaluation
  - xii. Salaries and expenses for management, unless expressly allowed in the VOCA Final Rule.

**2. *On the Service History and Project Page, under the FY17 Actual column, do we include vacant positions in the direct service FTEs?***

- a. Yes, list vacant positions.

**3. *There are several hospitals in our current service areas that are not receiving medical advocacy. Would this be considered service expansion and is it allowable?***

- a. Yes, it is expansion and allowable.

**4. *Are we able to include ICASA General Revenue, ICASA General Revenue Competitive, and Special Tax as matching funds for our VOCA grant?***

- a. Yes.

5. *We currently have a satellite office. It's not large enough for the additional staff we will hire. We will need to find a larger office. Should we answer "Yes" to question 4?*

- a. Yes.

6. *Are moving costs allowable?*

- a. Yes, VOCA can fund a proportionate share of moving costs based on VOCA funded FTEs at a rate not to exceed a reasonable market rate.

7. *Are the time limits for adjunct services per FTE or per center?*

- a. Per FTE

8. *What are some examples of direct and indirect costs?*

- a. **Direct** Costs that are allowable:

- i. Salaries and wages (Direct Service Personnel, Supervision of DSP and Direct VOCA Administrative Time)
- ii. Fringes (same as above)
- iii. Prorated share of liability insurance
- iv. Contracting specialized professional services (not to exceed a reasonable market rate)
- v. Proportionate share of audit expense
- vi. Rent & Occupancy for program (the prorated costs of rent and utilities; VOCA cannot be used to pay for more than 150 sq. ft. at the market value per VOCA FTE staff position)
- vii. Postage & Copies (specific to VOCA)
- viii. Communication expenses (% of direct FTEs)
- ix. Victim Services (travel, hotel, meals, lock replacement, interpreter)
- x. Travel expenses (direct funded staff)
- xi. Training-related travel (travel, meals, lodging & registrations fees for paid direct-service staff (both VOCA-funded and not)
- xii. Program Materials and Supplies (program direct)
- xiii. Printing and Office (allowable if specific to VOCA)
- xiv. Equipment (100% for VOCA direct service personnel only or % used by direct funded staff)

- b. **Indirect** costs that are allowable:

- i. Operating and maintaining facilities,
- ii. General administration and general expenses, such as salaries and expenses of personnel administration, and accounting
- iii. Office supplies, Office rent (common areas such as reception areas, break rooms, conference rooms). Utilities, Postage.
- iv. Administrative support such as clerical.
- v. Depreciation on buildings and equipment.

**9. What service is “public presentations/outreach” considered since Public Education is not allowed under VOCA?**

- a. Public Awareness - Public awareness and educational presentations (including, but not limited to, the development of presentation materials, brochures, newspaper notices, and public service announcements) in schools, community centers, and other public forums that are designed to inform crime victims of specific rights and services and provide them with (or refer them to) services and assistance. **These services are reported as Awareness Promotion or Social Justice Activism in InfoNet.**

**10. Can VOCA funded staff participate in Sexual Assault Response Teams (SARTS)?**

- a. Yes, VOCA funded staff can participate in SARTS and similar collaborative efforts to represent victim interests, inform members about trauma informed care, rape crisis services, and advocate for sensitive responses to victims.

**11. Can a person supervising VOCA hotline volunteers have a percentage of VOCA funds be administrative?**

- a. ~~Yes, it would be the percentage of time spent supervising VOCA hotline volunteers. The percentage of time must be documented quarterly on the Time Certifications Report.~~  
**Positions supervising direct service volunteers are considered direct service (not administrative) positions. Volunteer trainer positions that DO NOT supervise direct services provided by volunteers are not allowable with VOCA.**

**12. How do I figure the Modified Total Direct Cost (MTDC) base?**

MTDC = Salaries & Wages, Fringes, Services & Travel, Material & Supplies

| Program A            | VOCA Budget     |
|----------------------|-----------------|
| Salaries & Wages     | \$100,000       |
| Fringe Benefits      | \$50,000        |
| Services & Travel    | \$10,000        |
| Materials & Supplies | <u>\$20,000</u> |
| TOTAL                | \$180,000       |

10% de minimum rate of (MTDC) \$18,000

Combined approved budget should be \$198,000

MTDC excludes costs for equipment, capital expenditures, charges for patient care, rental costs, tuition reimbursement, scholarships, fellowships, and participant support costs (stipends or subsistence allowance, travel allowances, and registration fees paid to or on

behalf of participants or trainees (but not employees) in connection with conferences or training projects).

**13. How definitive do costs for new offices need to be?**

- a. Provide your best estimates for costs. You can make budget revisions later, when actual costs are known.

**14. What are direct costs & indirect costs?**

- a. Direct costs can be identified specifically with a particular final cost objective (i.e., a particular award, service or direct activity). Indirect costs are costs for which benefit to cost objective must be estimated, administrative costs which benefit the whole organization, and may also include facilities and other shared costs. (See also #8 above)

**15. How do I determine direct and indirect printing costs?**

- a. Publication costs for electronic and print media, including distribution, promotion, and general handling are allowable. If these costs are not identifiable with a particular cost objective, they should be allocated as indirect costs to all benefitting activities.

**Additional FAQs- 6.9.17**

**16. Should our amount to maintain services be our previous allocated VOCA amount?**

- a. Yes, this is essentially your “base” funding.

**17. What is the approved hourly rate for contractual clinical supervision?**

- a. The maximum allowable federal rate for contractual services is \$650 for an 8-hour day; prorated hourly amount \$81.25

**18. When filling out service projections, is the needed information for VOCA only, all ICASA sources or total sexual assault program?**

- a. This application is specific to VOCA, so the service data and projections are for VOCA only. Please use service data from 7/1/16 – 5/31/17 on the Excel spreadsheets.

**19. The application narrative (Executive Summary pg. 3) lists time frame for reporting FY17 service data as three quarters (July 1-March 31); the service projections chart lists time frame for reporting FY17 data as 11 months (July 1-May 31). Which time frame should we use?**

- a. Both. Based on the prior application release date, the 9 mos. time frame was the most current. The delays in issuing the application resulted in the ability to collect more current data. Please use three quarters of data on the Executive Summary and 11 mos. of data on the Excel chart.

- 20. Unallowable costs list audit for agencies receiving less than \$750K, but then in allowable direct costs it says we can charge a proportionate share of the audit. Explain?**
- a. ICASA’s current policy (P&P 6-9) states “the proportional share of audit expenses is allowable. The allowable percentage is determined by dividing each VOCA allocation into the center’s total organizational budget. The actual amount allocated must be based on this percentage of the actual audit expense, which means you must use the VOCA amount allocated in FY17 since the year being audited in 2018 will be for 2017. ICASA is retaining the approved current policy for FY18. (See also #1 above)
- 21. In the list of allowable costs the list includes proportionate shares of liability insurance, contractual services, etc. It looks like when we are calculating our “Modified Total Direct Cost Base” we are NOT using the proportionate share of insurance, contractual, etc. Is this correct?**
- a. Yes, this is correct. Some of the allowable direct costs (prorated and proportionate) are not included in the “Modified Total Direct Costs” base. So, when determining your MTDC you are only allowed to use salaries, fringes, services & travel, and materials & supplies.
- 22. For the funds we get as a result of calculating the indirect costs (we have the 10% de minimus), I think we were told on the webinar that budgeted funds for the indirect cost rate (ICR) have to be used for allowable costs also, not for unallowable ones. On our application, do we need to detail what those dollars will be used for?**
- a. You are correct. Unallowable costs are unallowable for both direct and indirect costs per VOCA guidelines. No, you do not need to detail how those dollars will be spent in this application.
- 23. Equipment rental/maintenance is marked out on the budget? Can a prorated portion of VOCA be used for telephone system?**
- a. Yes, you can include a prorated portion of VOCA for the telephone system. Please add under the “Telephone/Page (lease)”
- 24. The Executive Summary for Hours of Service does not include information & referral, significant other consultation, institutional advocacy, awareness promotion/social justice activism or professional training. Do we not put them in there anywhere?**
- a. You need only include the requested data elements on the Executive Summary. When completing the service projections chart, you will include all VOCA funded services.
- 25. Is professional training unallowable with VOCA funds?**
- a. Correct. Professional Training, which has previously been permitted on a very limited basis via agreement between ICASA & ICJIA, is now explicitly disallowed with VOCA funds. Do not project VOCA-funded professional training hours on this grant.

**26. Can you clarify what a budget justification looks like?**

- a. Budget justification is the same type of content as “budget narrative” in prior ICASA applications. Basically, it is brief narrative explanation of the budgeted expenses.

**27. Can we pay for newspaper notices and brochures for “public presentations/outreach”?**

- a. You can purchase program supplies & printing for public presentations/outreach; however, newspaper notices for vacant positions is not permitted with VOCA.

**28. Can we pay for advertising for vacant VOCA positions?**

- a. No. Advertising staff vacancies is unallowable with VOCA funds.

**29. We have a short list of service innovations and enhancements that involve technology. Examples include Short Message Services (texting) for hotlines, tablets/laptops for VOCA-funded staff, data and outcomes management software, app development to support medical advocacy, etc. Are these examples allowable with VOCA funds?**

- a. Yes, procuring automated systems and technology that supports delivery of direct services to victims is allowable provided that it does not conflict with ICASA’s position or policies on use of technology to provide direct services. (For example, ICASA’s Governing Body decided against ICASA’s participation in RAINN’s online hotline.) VOCA funds can support only a prorated share of items not used exclusively for victim-related activities.

**Additional FAQs- 6.12.17**

**30. You mentioned rent is based on square footage. What is the calculation based on one month’s rent?**

- a. Monthly rent \$5,000  
 Square Footage 3,000  
 $\$5,000/3,000 = \$1.67$  per square foot  
 6.25 VOCA Funded FTE’s (FY18)  
 $150 \text{ square feet} * 6.25 \text{ FTE’s} = 937.50 \text{ square feet}$   
 $937.50 \text{ square feet} * \$1.76 = \$1,650$

**31. What amounts can be allocated for liability and audit?**

- a. Centers may allocate a proportionate share of audit expenses (based on prior year’s VOCA allocation in comparison to total organization).
- b. Professional liability is based on the percentage of staff time allocated to VOCA.
- c. Property liability is a proportionate share in comparison to the total organization.

**32. What amounts can be allocated for office expenses?**

- a. For FY18, office supplies up to \$50 per month per VOCA funded FTE is allowable.

**33. In the NOFO on page 5 under Intent of Funds, services listed are 24-hour crisis response, medical advocacy, criminal/civil justice advocacy, personal advocacy/case management, counseling and info and referral. Are significant other consultation, institutional advocacy, awareness, and/or professional training not funded. If not why are we able to project those hours in the Service History and Projections Form.**

- a. Centers can project direct service hours for SOC, IA and AP/SJA as these are allowable with VOCA funds. However, professional training is now unallowable with VOCA funds. Unfortunately, we learned this after preparing the chart– that’s why the line is still open on the Excel chart.

**34. If Prevention Educators spend their school year doing Prevention and their summer doing VOCA activities and we determine a 75/25 split is appropriate for projections, does the costs of the increased salary need to be divided proportionately between the 2 funding streams? Or can VOCA absorb the increase regardless of FTEs and projections?**

- a. Yes, VOCA can absorb the increase, though if VOCA pays a higher percentage of the salary, the FTEs and projections must be commensurate with the VOCA %. For example, if you have an Educator/Advocate position with a base salary of \$25,000 and you want to raise the base salary 10% to \$27,500, you can do so. However, if there aren’t sufficient funds to proportionately increase the VAWA & VOCA amounts, you can increase the VOCA %. However, you will need to adjust the VOCA FTE/projections accordingly; e.g., adjusted position might be 72%/28% instead of 75%/25%.

**35. Do conferences with VOCA need to be approved?**

- a. Yes, all conference funded with VOCA need prior ICASA approval. To date, conference have had to specifically include sexual assault topics (by name); however, beginning in FY18, ICASA will be able to approve conference attendance for related issues (e.g., general trauma, abuse) as well.

**36. Can you define the line item “copies/duplicating”?**

- a. The center can combine the costs of paper, toner, and copying for sexual assault program. Then apply a prorated portion to VOCA based on VOCA funded FTEs. Printing costs would be report separately under Supplies on the printing item line.

**Additional Q&A 6-13-17**

**37. Is it best to keep our responses on the application in the little spaces allotted for narratives or can we go over? Is there a page limit on the document or a size limit on the response?**

- a. Yes, use the little spaces please. You may adjust space on the same page, but ensure responses do not roll over to the next page. Save the lengthiest responses for the full-

page prompts on pages 4-5 & 9. Pages can be added to the budget narrative, but otherwise use only the space provided on each page. Please use at least 10pt font.

**38. Are we correct that the training event we are hosting about sexual assault where we have invited law enforcement, medical staff and social service agencies could have a speaker paid for by VOCA?**

- a. Yes, that is correct. You will need to operate within the federal guidelines for paying contractual speaker fees. Max = \$650 for 8 hours or \$81.25 per hour.

**39. What line item of the budget would these items fall under:**

- a. Director’s Liability - (prorated amount) **Contractual Services**  
 Building Maintenance / Repair - (proportionate amount) **Contractual Services**  
 Printed Materials (brochures educating on VOCA funded services) - **Supplies/Printing**  
 Computer for New VOCA Funded Staff – **Equipment** if unit price exceeds \$500;  
**Supplies** if less than \$500.

**40. We would like to propose funds for child care. It’s not treatment, just babysitting. Do people who would like to do this must be 40-hour trained?**

- a. Since child care is not considered a direct service, staff who provides child care would not be required to have 40-hour training. However, centers are strongly encouraged to 40-hour train everyone on your sexual assault program staff because disclosures made to non-40 hour trained staff would not be covered by the rape crisis privilege. You would also have to restrict access to any confidential communications for staff not 40-hour trained- they could not even assist with answering the phone/hotline for the center.

**41. My understanding from GATA webinars, and it was also stated in the ICADV NOFO, that nonprofits can supplant. This NOFO seems to direct strongly against supplanting. What’s up?**

- a. Supplanting is (still) explicitly disallowed in the updated VOCA guidelines. (See page 15 on the side-by-side comparison). We are not sure where this originated, but it is not our understanding and appears counter to the VOCA guidelines; therefore, such an exception is not included in the ICASA NOFO. ICASA staff has contacted the ICJIA for clarity and will provide updates as available. As a reminder, it is NOT considered supplanting to use federal funds to pay for positions previously paid with funds that have been lost or are otherwise no longer available.

**42. I was wondering if there is any chance that draft allocations might be available before the VOCA applications are due? We have staff who could be paid with VAWA Satellite, SASP, or VOCA Advocacy/Counseling, and we really don’t want to leave money on the table in the VOCA application if Satellite/SASP numbers will decrease from FY17 levels.**

- a. We know that the current (ever-fluctuating) timelines we are all working under make planning very difficult. Once we finalize the VOCA NOFO/application, ICASA staff's primary focus will be on the other (non-VOCA) ICASA allocations. We have preliminary amounts to work with for all sources except GRF. The preliminary due date is August 2; however, we do not yet have dates for the TA workshop, applications issue date, etc. As you begin to plan for FY18, it's reasonable to use FY17 amounts for all non-VOCA sources except GRF which remains unknown. We expect (hope) to receive GRF, but can't confirm amounts, timelines, etc.

***43. What costs are "services" in calculating MTDC under "services & transportation"***

- a. Services are Direct Victim Services, which are usually budgeted under "Other". These include costs such as interpreter, cab vouchers/bus tokens/gas cards, transportation of victim.
- b. Transportation includes direct VOCA funded travel, training travel, lodging, and conference registration.