Funding Source Purposes

Allowable and unallowable programming are determined not only by the below funding info but <u>also</u>:

- What DHHS contracts with us to do and what the network of providers has agreed to provide (e.g. medical and legal accompaniment you must do it in order to receive your VOCA funds)
- What your agency decides to do and not do (e.g. agency strategic plan, agency work plan, agency priorities, agency leadership decisions, board of directors decisions)
- Other laws and rules regulating non-profits (e.g. IRS says you can't keep your non-profit status and engage in partisan election work)

Always unallowable in our federal funding sources: construction, lobbying, any expenses related to fundraising (including staff time), capital expenses, interest on late payments, interest of lines of credit

Virtually always unallowable: food, dues

Funding	CFDA#	Purpose	Key Unallowable Activities	Notes and Source Docs
Source				
Sexual Assault Services Formula Grant (SASP)	16.017	 Direct intervention and related assistance for victims of sexual assault including: helpline and crisis intervention, medical and CJ accompaniment, short-term individual and group support services, service coordination and information and referral to assist victims and family or household members the development and distribution of materials related to the services described above. 	SART: Only partially unallowable. The FAQs indicate that SART is not allowable; this speaks to SART meetings not accompaniment functions. Accompaniment functions are allowable. But "if an advocate position is funded under a [SASP] subgrant, the advocate's time in attending SART meetings may be covered as part of the advocacy he or she provides." A SASP funded advocate cannot host or coordinate the SART, unless they are funded in another way for that time. However, if it is part of the advocate's role to attend the SART advocating for survivors, their time may be paid with SASP funds. Community/school-based Education: Unallowable with the exception of "the development and distribution of materials related to" SASP allowable services.	Advocacy with incarcerated victims is allowable. Outreach materials must focus on victim services available as opposed to information about all agency services in general. Any materials printed must receive prior approval and include OVW disclaimer. Specific allowable programming may change from year to year based on what is listed in the federal Request for Proposal (RFP) and the programming that DHHS proposes to fund in response to the RFP.

				Special conditions in OVW's contract with DHHS change annually. Additional limitations can be found in the Department of Justice Grants Financial Guide. Federal Statute OVW SASP FAQs OVW Regulations Violence Against Women Reauthorization Act of 2013 Current Year RFP (looking for link)
VOCA Assistance Formula Grant Program (VOCA) also sometimes called the Crime Victims' Assistance Program (CVAP)	16.575	Selected Allowable Direct Services (see rule for complete list): 1. Immediate emotional, psychological, and physical health and safety—Services that respond to immediate needs of crime victims, including, but not limited to: • Crisis intervention services; • Accompanying victims to hospitals for medical examinations; • Hotline counseling; • Safety planning; 2. Personal advocacy and emotional support—Personal advocacy and emotional support, including, but not limited to: • Working with a victim to assess the impact of the crime; • Identification of victim's needs; • Case management; • Management of practical problems created by the victimization;	 Expressly unallowable sub-recipient costs: Prevention programming; Research and studies—Research and studies, except for project evaluation under §94.121(j); Active investigation and prosecution of criminal activities— The active investigation and prosecution of criminal activity, except for the provision of victim assistance services (e.g., emotional support, advocacy, and legal services) to crime victims, under §94.119, during such investigation and prosecution; Capital expenses—Capital improvements; property losses and expenses; real estate purchases; mortgage payments; and construction (except as specifically allowed elsewhere in this subpart). Compensation for victims of crime—Reimbursement of crime victims for expenses incurred as a result of a crime, except as otherwise allowed by other provisions of this subpart; Medical care—Medical care, except as otherwise allowed by other provisions of this subpart; and 	Agency must use volunteers for some of their programming. Total program budget must be supported by 20% match, unless a waiver is in place. Services to incarcerated victims were unallowable under previous rule, but are now allowable. DHHS has designated that certain VOCA allocations can only be used for certain functions: VOCA-CAC, VOCA-Underserved, VOCA-SA. These cannot be used for other programming. Refer to agency allocation package. Additional limitations can be found in the Department of Justice Grants Financial Guide. Federal Statute VOCA Rule 2016 VOCA Rule FAQs

 Identification of resources available to the victim; Provision of information, referrals, advocacy, and follow-up contact for continued services, as needed; and Traditional, cultural, and/or alternative therapy/healing (e.g., art therapy, yoga); 	7. Salaries and expenses of management—Salaries, benefits, fees, furniture, equipment, and other expenses of executive directors, board members, and other administrators. ⁴	
3. Peer-support—Peer-support, including, but not limited to, activities that provide opportunities for victims to meet other victims, share experiences, and provide self-help, information, and emotional support;		
4. Facilitation of participation in criminal justice and other public proceedings arising from the crime— The provision of services and payment of costs that help victims participate in the criminal justice system and in other public proceedings arising from the crime (e.g., juvenile justice hearings, civil commitment proceedings), including, but not limited to:—		
 Advocacy on behalf of a victim; Accompanying a victim to offices and court; Notification to victims regarding key proceeding dates (e.g., trial dates, case disposition, incarceration, and parole hearings); Assistance with Victim Impact Statements; 		

• Assistance in recovering property that was

retained as evidence; and

⁴ Except when providing direct services or staff supervision as outlined elsewhere in the regs.

 Assistance with restitution advocacy on behalf of crime victims.
5. Forensic interviews—Forensic interviews, with the following parameters:
 Results of the interview will be used not only for law enforcement and prosecution purposes, but also for identification of needs such as social services, personal advocacy, case management, substance abuse treatment, and mental health services; Interviews are conducted in the context of a multi-disciplinary investigation and diagnostic team, or in a specialized setting such as a child advocacy center; and The interviewer is trained to conduct forensic interviews appropriate to the developmental age and abilities of children, or the developmental, cognitive, and physical or communication disabilities presented by adults.
6. Transportation—Transportation of victims to receive services and to participate in criminal justice proceedings;
7. Public awareness ¹ —Public awareness and education 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

¹ Printed materials typically require approval from DHHS and may also require language on them related to the funding source used.

provide them with (or refer them to) services and assistance. Selected Allowable costs for activities supporting direct services: 1. Coordination of activities—Coordination activities that facilitate the provision of direct services, include, but are not limited to, State-wide coordination of victim notification systems, crisis response teams, multi-disciplinary teams, coalitions to support and assist victims, and other such programs, and salaries and expenses of such coordinators; 2. Supervision of direct service providers—Payment of salaries and expenses of supervisory staff in a project, when the SAA² determines that such staff are necessary and effectively facilitate the provision of direct services; 3. Multi-system, interagency, multi-disciplinary response to crime victim needs—Activities that support a coordinated and comprehensive response to crime victims needs by direct service providers, including, but not limited to, payment of salaries and expenses of direct service staff serving on child and adult abuse multi-disciplinary investigation and treatment teams, coordination with federal agencies to provide services to victims of federal crimes and/or participation on Statewide or other task forces, work groups, and committees to develop protocols, interagency, and other working agreements;

² SAA = State Administering Agency = Maine DHHS Office of Children and Family Services

4. Contracts for professional services—Contracting for specialized professional services (e.g., psychological/psychiatric consultation, legal services, interpreters), at a rate not to exceed a reasonable market rate, that are not available within the organization;	1	
5. Volunteer trainings—Activities in support of training volunteers on how to provide direct services when such services will be provided primarily by volunteers; and		
6. Restorative justice ³ —Activities in support of opportunities for crime victims to meet with perpetrators, including, but not limited to, tribal community-led meetings and peace-keeping activities, if such meetings are requested or voluntarily agreed to by the victim (who may, at any point, withdraw) and have reasonably anticipated beneficial or therapeutic value to crime victims. SAAs that plan to fund this type of service should closely review the criteria for conducting these meetings and are encouraged to discuss proposals with OVC prior to awarding VOCA funds for this type of activity. At a minimum, the following should be considered:—		
(1) The safety and security of the victim;		
(2) The cost versus the benefit or therapeutic value to the victim;		

(3) The procedures for ensuring that participation of the victim and offenders are voluntary and that the

nature of the meeting is clear;

³ Requires prior approval from DHHS

		(4) The provision of appropriate support and accompaniment for the victim;(5) Appropriate debriefing opportunities for the victim after the meeting; and(6) The credentials of the facilitators.		
Rape Prevention and Education Program (RPE)	93.136	The overarching purpose of the Rape Prevention and Education (RPE) program is to prevent sexual violence perpetration and victimization. This NOFO, CE#19-1902 Rape Prevention and Education: Using the Best Available Evidence for Sexual Violence Prevention, aims to reduce the risk factors and increase the protective factors associated with sexual violence perpetration and victimization, in addition to the eventual reduction of SV victimization rates. State programming is determined by state's five year RPE plan which is created by DHHS in consultation with MECASA and other partners. The state's selected strategy is: Statewide implementation of the Children's Safety Partnership, a public-private initiative to ensure every public elementary school in Maine develops a policy for child sexual abuse prevention and response, trains every member of its personnel, and every child receives prevention programming. Prevention programming must be part of the written school health education curriculum; follows an appropriate scope and sequence (developmentally appropriate); and aligned to the Maine School Learning Results (which include	 Funding Restrictions as outlined by the NOFO: Recipients may not use funds for research Generally, recipients may not use funds to purchase furniture or equipment. Any such proposed spending must be clearly identified in the budget. Funds may not be used to provide direct counseling, treatment, or advocacy services to victims or perpetrators of sexual violence (with the exception of hotlines) Funds may not be used for media or awareness campaigns that exclusively promote awareness of where to receive victim services. 	Programming must be primary prevention focused and utilize the public health approach and social-ecological model. Link to (Notice of Funding Opportunity) NOFO Link to general RPE site through CDC but specific links re: FAQ/at a glance guide are broken. 2020 Maine State Action Plan (2019 – 2024)

		comprehensive sexuality education from pre-K-grade 12).		
Social Services Block Grant (SSBG)	93.667	The Social Services Block Grant (SSBG) is a flexible funding source that allows States and Territories to tailor social service programming to their population's needs. Through the SSBG States provide essential social services that help achieve a myriad of goals to reduce dependency and promote self-sufficiency; protect children and adults from neglect, abuse and exploitation; and help individuals who are unable to take care of themselves to stay in their homes or to find the best institutional arrangements. Services funded by the SSBG must be directed at one or more of five broad statutory goals: Achieving or maintaining economic self-support to prevent, reduce, or eliminate dependency Achieving or maintaining self-sufficiency, including reduction or prevention of dependency Preventing or remedying neglect, abuse, or exploitations of children and adults unable to protect their own interest or preserving, rehabilitating, or reuniting families Preventing or reducing inappropriate institutional care by providing for	Anything not expressly funded through the DHHS contract.	SSBG Rules Additional Federal Guidance

⁵ https://www.acf.hhs.gov/ocs/programs/ssbg

		community-based care, home-based care, or other forms of less intensive care • Securing referral or admission for institutional care when other forms of care are not appropriate or providing services to individuals in institutions Funded programming is determined by the ME DHHS on an annual basis. FY 2020 State Plan indicates the service objective is to, "provide advocacy and support to victims of human trafficking, domestic, dating, and/or sexual violence and their affected family members." For additional detail on scope of programming see DHHS/MECASA contract. SSBG has been treated as the most flexible of the federal funding sources contained in the DHHS/MECASA contract and is used to fill in programming gaps and fund basic agency operations.		
Temporary Assistance for Needy Families (TANF)	93.558	 TANF has four goals: provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage; prevent and reduce the incidence of out of wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; 	Anything not listed in the Public Consulting Group (PCG) justification (see left-hand column).	In order for states to receive TANF, other dollars must also be expended on these programs. This state-spending requirement is called the "maintenance of effort" (MOE) requirement and essentially functions like a match. It is the reason why centers must report on volunteer time associated with

4. encourage the formation and maintenance of two-parent families.⁶

In 2016, the Maine Dept. of Health and Human Services removed some state funds, VOCA, and SSBG funds from sexual assault support center contracts and replaced them with TANF. Subsequently, DHHS contracted with PCG, who indicated the following programming provided through sexual assault support centers and children's advocacy centers was allowable⁷:

Helpline

States can use TANF funds to "...identify and service children in needy families who are at risk of abuse or neglect...", including directing funding towards specific problems.⁸ The sexual assault hotline is used to identify and screen children who are victims of sexual abuse. If necessary, the hotline staff provides referrals to other allowable services, including counseling and the children's advocacy center. Receiving services allows parents to gain greater self-sufficiency, which allows for children to be cared for safely in their own homes, and ensures abused children receive the services necessary to remain in their homes, thus fulfilling TANF purpose 1. Additionally, ACF9 has identified services for domestic violence including those to, "...screen and identify victims; develop safety and service plans;

helpline – as ME DHHS uses it toward their MOE.

CAC: DHHS contract limits TANF to work with MaineCare eligible children (excluding Katie Beckett).

Agency allocation package indicates how much TANF may be expended in each of the three "allowable" categories.

TANF Statute
TANF Rules

⁶ Social Security Act § 401, 42 U.S.C. § 601(a).

⁷ "Sexual Assault Claims Overview" June 6, 2017 memo from Public Consulting Group to the Maine Department of Health and Human Services.

⁸ Helping Families Achieve Self-Sufficiency: A guide to Funding Services for Children and Families through the TANF Program, Administration for Children and Families, page 22. Accessed at: http://files.eric.ed.gov/fulltext/ED449307.pdf.

⁹ This footnote is not from the original memo – ACF = federal Administration for Children and Families which oversees TANF

provide appropriate counseling, referrals and other related services..."¹⁰ as allowable uses of TANF. The definition of domestic violence provided by the Office on Violence against Women (OVW), part of the Department of Justice, includes: "Sexual Abuse: Coercing or attempting to coerce any sexual contact or behavior without consent. Sexual abuse includes, but is certainly not limited to, marital rape, attacks on sexual parts of the body, forcing sex after physical violence has occurred, or treating one in a sexually demeaning manner."¹¹ As sexual assault in some circumstances is included in the definition of domestic violence, the sexual assault helpline in Maine screens and identifies potential domestic violence victims, which is an allowable use of TANF.

School-Based Education

ACF allows for the use of TANF funds on educational activity: "States may use Federal TANF funds to pay for pre-kindergarten, kindergarten, or other educational costs under purpose 3 or purpose 4, if these activities are not part of a State's general free education system." School-Based Sexual Assault education teaches children to interact with others in a healthy manner, communicate well, have higher self-esteem, identify and develop healthy relationships, and recognize and avoid abuse. Purpose 3 and 4 of TANF are to:

 Prevent and reduce the incidence of out-ofwedlock pregnancies

¹⁰ Helping Families Achieve Self-Sufficiency: A guide to Funding Services for Children and Families through the TANF Program, Administration for Children and Families, page 20. Accessed at: http://files.eric.ed.gov/fulltext/ED449307.pdf.

¹¹ https://www.justice.gov/ovw/domestic-violence

¹² TANF-ACF-PI-2005-01 (Domestic Violence Awareness Month: Opportunities and TANF Resources For Prevention and Action). Accessed at: https://www.acf.hhs.gov/ofa/resource/tanf-acf-im-2014-03.

Encourage the formation and maintenance of two parent families.

 Page 1 based education clearly mosts those

School based education clearly meets these purposes, by helping children to develop the skills that will lead to healthy relationships, and thus two-parent families, and reduce out of wedlock pregnancies.

Children's Advocacy Center (CAC)

ACF specifically allows for the funding of child welfare services. States can use TANF funds to "...identify and service children in needy families who are at risk of abuse or neglect...", including directing funding towards specific problems. 14 Children's Advocacy Centers are a national service delivery model. Centers are, "a child-focused, facility-based program in which representatives from many disciplines, including law enforcement, child protection, prosecution, mental health, medical and victim advocacy, and child advocacy work together to conduct interviews and make team decisions about investigation, treatment, management and prosecution of child sexual abuse cases."15 Sexual Assault CAC advocates work directly with families and other providers to assist children in overcoming past trauma, prevent future trauma, and keep children safe. This directly fulfils purpose 1 by allowing children to be cared safely in their own home.

¹³ Social Security Act § 401, 42 U.S.C. § 601(a). Accessed at: https://www.ssa.gov/OP_Home/ssact/title04/0401.htm.

¹⁴ Helping Families Achieve Self-Sufficiency: A guide to Funding Services for Children and Families through the TANF Program, Administration for Children and Families, page 22. Accessed at: http://files.eric.ed.gov/fulltext/ED449307.pdf.

¹⁵ http://www.cacmaine.org/what-are-cacs/

Preventative	93.991	The PHHS Block Grant Program allows states,	Any programming which is not included in the state plan.	Total set-aside allocation to Maine
Health and		territories, and tribes to:		< \$30k.
Human				PHHSBG Statute
Services Block		 Address emerging health issues and gaps 		Most recently publicly available
Grant		Decrease premature death and disabilities		state plan.
(PHHSBG)		by focusing on the leading preventable risk factors		
		 Work to achieve health equity and eliminate health disparities by addressing the social determinants of health Support local programs to achieve healthy communities Establish data and surveillance systems to 		
		monitor the health status of targeted populations 16		
		Block Grant includes specific set-aside dollars for		
		"providing services to victims of sex offenses and		
		prevention of sex offenses"		
		Maine programming is determined by annual state		
		plan which is developed by the ME CDC and which		
		funds a very small portion of middle/high school school-based prevention work.		
Rural Sexual	16.589	OVW Discretionary Grant Program Allowable	Anything outside of the scope of the grant as proposed and	Any materials printed must receive
Assault,		activities driven by approved grant application. For	approved by OVW.	prior approval and include OVW
Domestic		FYs 20-22 purpose is to retain/hire and support		disclaimer.
Violence,		dedicated sexual assault specific rural advocates in		Note other contract special
Dating		each of Maine's three most rural regions (Downeast		conditions.
Violence, and		and Aroostook, the Highlands, and the Midcoast) in		Additional limitations can be found
Stalking		order to:		in the Department of Justice Grants
Assistance		increase the accessibility of sexual assault		Financial Guide.
		services;		

¹⁶ https://www.cdc.gov/phhsblockgrant/about.htm

Program (OVW-Rural)		 increase the awareness of sexual violence services and effective response and referrals for survivors of sexual violence among allied providers; and increase the awareness of sexual violence, its impacts, and resources for prevention and response within the general public. Specific deliverables can be found in your OVW-Rural contract with MECASA. 	Fact Sheet on all OVW Grant Programs OVW Regulations Violence Against Women Reauthorization Act of 2013
State General Funds	N/A	Can be used for both prevention and intervention. One of the very few flexible funds. Includes legacy "level II" funding which requires, among other things, that providers engage with someone to provide clinical supervision. As a result of the flexible nature of these funds, they best used to fill in programming gaps and fund basic agency operations.	One of the few sources for cash match. Should be allocated with that in mind.

In order to receive the above funds from DHHS, all sexual assault support centers must provide the following services:

I. DELIVERABLES

The Provider shall perform all services and maintain all standards and requirements for services provided under this Agreement in accordance with the below:

Sexual Assault Support Centers (SASCs)

1. Eligibility

a. Victims shall be offered appropriate services on a voluntary basis, and at no cost.

2. Staff and Volunteers

- a. Successfully complete the Sexual Violence Service Provider/Advocate forty (40) hour statewide training curriculum.
- b. Successfully complete any additional job specific training required by the Provider.
- c. Access to continuing education, including local, State, and national training to support skill development and best practices.
- d. Comply with the VOCA and VAWA privacy regulations as defined in 42 USC §13925, and §94.115.
- e. Comply with any reporting to the Department, pursuant to 22 M.R.S.A. §§ 3477 and 4011, if SASC staff has reasonable cause to suspect that a child or adult has been or is likely to be abused or neglected.

3. **Services**

a. **Advocacy**

Includes, but not is limited to:

- i. Crisis Intervention;
- ii. Referrals to community services and resources, such as law enforcement, civil legal services, medical providers, dental providers, substance and available therapeutic support services;
- iii. Accompaniment to events or proceedings, such as criminal or civil court proceedings and interviews or meetings with law enforcement or civil legal services;
- iv. Assistance applying for State and/or federally funded benefits;
- v. Assistance applying for the Address Confidentiality Program;
- vi. Assistance in completing an application for the Victims' Compensation Program; and
- vii. Assistance completing and filing Complaints for Protection from Abuse.

b. Sexual Assault Crisis and Support Line

- i. Twenty-four (24) hour access through toll-free phone contact with immediate response or a return call within fifteen (15) minutes of the original contact.
- ii. Access for Victims with limited English proficiency or who are hearing impaired.
- iii. Victim anonymity.

c. Support Groups

i. Have at least two (2) participants, not including the facilitator.

- ii. Provide information and resources regarding Sexual Violence and Sex Trafficking and Sexual Exploitation.
- iii. Provide information to decrease isolation of Victims by building peer and community support systems.
- iv. Be held in safe, accessible locations.
- v. Assistance with access to childcare.
- vi. Develop and maintain coping skills.
- vii. Provide information and education on the Dynamics of Sexual Violence and impact of Sexual Violence-related Trauma.
- viii. Provide education on life skills (e.g. decision-making, parenting, goal setting, etc.), where appropriate.

d. Prevention Education

- i. Community-based
 - 1) Increase the knowledge of the community regarding Sexual Violence and Sex Trafficking and Sexual Exploitation.
 - 2) Using various methods, including community campaigns, social media, TV/radio interviews, special events, and distribution of posters, brochures, and other materials, disseminate information regarding best practices in the response to and the prevention of Sexual Violence and Sex Trafficking and Sexual Exploitation.
 - 3) Establish policies, protocols, procedures, Memoranda of Understanding, training or awareness programs, public policy, or other efforts to ensure more effective and informed community response to Sexual Violence and Sex Trafficking and Sexual Exploitation.

i. School-based

- 1) Increase the knowledge of school-aged children regarding Sexual Violence and Sex Trafficking and Sexual Exploitation, through age appropriate curricula.
- 2) Communicate strategies that promote Protective Factors associated with healthy relationships; reduce Risk Factors associated with Sexual Violence and Sex Trafficking and Sexual Exploitation.
- 3) Promote Protective Factors and reduce Risk Factors within the community by delivering primary prevention programming, as appropriate within their defined geographic areas to youth, youth serving organizations, parents, community organizations, coalitions, and communities statewide.

e. Children's Advocacy Center (CACs) Services

- i. Coordinate and facilitate Forensic Interviewing by one (1) or more individuals trained in methods consistent with National Children's Alliance Accreditation standards, for all children referred to the CAC.
- ii. Offer Family Advocacy services to Non-offending caregivers.
- iii. Ensure the coordination of MDTs, including ongoing case review, system improvement, and assessing and meeting training needs of team members (through local training or connecting with statewide or other resources).
- iv. Maintain accreditation or actively work toward accreditation with the National Children's Alliance.
- v. Attend Maine Network of CAC meetings.
- vi. CAC Accreditation: SASCs that are funded to provide Forensic Interviews and associated Family Advocacy must be nationally accredited or associate members of the accrediting body and actively working toward national accreditation (this is a required for all Children's Advocacy Center services).