NEBRASKA COMMISSION ON LAW ENFORCEMENT AND CRIMINAL JUSTICE

VOCA Match Waiver Policy & Procedure

Introduction:

This policy addresses match waivers for the Victims of Crime Act (VOCA) Grant program and the procedure the Nebraska Crime Commission (NCC) uses to determine match waivers as the State Administering Agency (SAA) of VOCA funding. The Office for Victims of Crime's (OVC) match requirements for VOCA expects subrecipient agencies to contribute twenty percent of the total cost of the VOCA-funded project, excluding federally recognized tribes or tribal land projects (28 CFR 94.118). Match requirements can be fulfilled through cash match (i.e. the value of direct funding for the project, salary for program staff not funded by VOCA or other federal funding) or in-kind match (i.e. volunteer hours or donated office space).

NCC Match Waiver Policy Overview:

This policy describes the process for two types of VOCA match waivers – those requested by subrecipients and those initiated by NCC. Match requirements are automatically waived for subrecipients that are federally recognized American Indian or Alaska Native tribes, or projects that operate on tribal lands. All other VOCA subrecipients are encouraged to meet match requirements.

Subrecipients are not penalized for inquiring about, seeking, and/or receiving reasonable and justified match waivers. Match waiver requests may be submitted at the beginning of the subgrant budget period (i.e. at application and/or at the beginning of each subsequent budget period in a multi-year project period). Request submitted at other periods of time should be rare and will be reviewed at the discretion of the VOCA Administrator.

Subrecipient Waiver of Match Request:

NCC encourages applicants and subrecipients to meet VOCA match standards to demonstrate cost-share support of their VOCA funded project and to contribute to sustainability of statewide funding efforts for Nebraska victims of crime. However, unforeseen circumstances can impact an agency's ability to provide direct services and may warrant a waiver of match request.

Such circumstances that NCC may consider include:

- Constraints on local resources (i.e. minimal funding available, limited volunteer capacity, staff recruitment or retention challenges, significant staff turnover);
- Unique/unforeseen situations that impact the normal operations of the subrecipient (i.e. natural disasters, mass violence/victimization events);
- An emergency impacting the subrecipient's ability to contribute match.

If requesting a full or partial waiver of VOCA match, the program's Project Point of Contact must submit a Waiver of Match Request letter for NCC approval, assuring to address all requested information below or the waiver request may be denied.

A match waiver may be requested either concurrently with the subaward application or post-approval should the subgrantee find themselves unable to fulfill the budgeted match requirement.

Waiver of Match Request Letter Methods:

- ***Subaward Application Request:*** Upload a letter on the agency's letter in the Other Documents section of the application in the grant management system.
- ***Post-Award Approval Request:*** upload a letter on the agency's letter in the Other Documents section of the application in the grant management system

All Waiver of Match Request Letters must include the following:

1) Type-written on the program's agency letterhead.
2) Include a brief description of the project and services to be provided by the VOCA project;
3) Clearly indicate/describe the hardship and/or type of circumstances that will hinder the program's ability to provide the required level of match, outline the issues related to the project's lack of resources (i.e. volunteers, other funding, in-kind donations);
4) Address what methods the organization has used to consider all possible options for meeting the match requirements and outline what steps the organization plans to take to meet future match requirements;
5) Address if a match waiver is approved, does the organization anticipate this being a one-time request or are there circumstances that will require a waiver request into subsequent budget years;
6) Explain how the denial of a match waiver would impact the proposed or approved VOCA project;
7) Advise whether or not the program would have to decline all or part of the subaward if a match waiver is not granted; AND
8) Signature from the project's three key personnel: Project Point of Contact, Financial Point of Contact, and the Authorized Official.

Application Submission

- The applicant submits a formal Waiver of Match Request letter and required financial documentation alongside their initial grant application packet inside the electronic grant management system; or
- If submitting a match waiver post-award, address to the assigned NCC Grant Manager and send to the assigned Grant Manager's email address and NCC.Grant@nebraska.gov.

Review of Waiver of Match Request and Final Determination Process:

1) Once received, the Waiver of Match Request letter will be reviewed by the Grant Administrator within 10-business days from receiving the waiver request from the subrecipient, or during grant review when submitted with funding application.

2) When making a waiver determination, the Grant Administrator should consider:

- How is the grant currently being matched? Consider past ability to provide match. (NOTE– OVC generally expects subrecipients to provide at least the same dollar amount of match it provided during the grant year immediately preceding the budget year of the waiver request, unless a change in circumstances justifies a lower amount.)
- What circumstances exist that impede the organization's ability to partially or fully match the VOCA grant funds requested? (i.e. local resource restraints of a rural community with limited local funding availability or volunteer capacity)
- Consider what practical and/or logical obstacles to providing match may exist (i.e. natural disasters, mass violence incidents, or when public agencies may have limitations on soliciting contributing funds since they do not engage in private fundraising).
- Has there been an increase to the VOCA funding where local funding availability has not increased to the same degree?
- 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? If so, what methods has the organization used to consider all possible options for meeting the match requirements?
- What steps does the organization plan to take in order to be able to meet the match requirement in the future?
- If a match waiver is approved, does the organization anticipate this to be a one-time request or are there circumstances that will require a waiver request into subsequent budget years?
- How would the denial of a match waiver impact the VOCA project?
- Would the program have to decline all or part of the grant award if a match waiver is not granted?

3) The VOCA Grant Administrator or designated staff will review the subrecipient's Waiver of Match Request letter and make an official final determination. Once a determination has been made, a Match Waiver Notification Letter will drafted approving or denying the request.

4) Match Waiver Determination Notification will outline:

- A brief description of the project/services provided by the applicant;
- Justification for Approval or Denial of the waiver;
- The scope of the waiver including the waiver dollar amount, percentage amount, and effective dates; and
- If applicable, a requirement of subrecipient to revise their active SAR in the OVC Performance Measurement Tool (PMT) System within 30-calendar days of the notification.

5) The Grant Manager or designated staff will upload the signed Match Waiver Notification Letter and waiver request letter into the electronic grant management system and send the Match Waiver Notification Letter to the program's Project Point of Contact, Financial Point of Contact, and Authorized Official.

NOTE -- Though a dollar amount is calculated, the Grant Manager's actual amount is a percentage of the applicant's/subgrantee's total project cost. Upon award, the Approved Match Waiver is a fixed percentage that will be applied should the project budget change.

6) The VOCA Grant Administrator or designated staff will submit to OVC a match waiver spreadsheet listing all subrecipient match waivers approved in a federal fiscal year for each relevant federal award no later than 120 days after fiscal year end. This will be submitted to OVC via a Grant Award Modification (GAM) uploaded to JustGrants or in another method as requested by OVC.

NCC-Initiated Waiver of Match:

The Nebraska Crime Commission has the authority to initiate Match Waivers for individual projects, multiple projects, or for all VOCA subrecipients when there is a direct and substantial burden on the subrecipient effectively providing services to victims of crime. NCC-initiated Match Waivers are only to be used when unique circumstances such as the following exist:

- Natural Disasters
- Pandemics or other geographic health crisis
- Mass violence/victimization events
- Internal NCC staff recruitment/retention challenges
- Other events as determined by Nebraska Crime Commission

Procedure:

1) VOCA Grant Administrator and/or NCC Executive Leadership determines if one of the above unique circumstances exists.
2) Notification of the NCC-initiated Match Waiver will be provided to impacted programs via separate Match Waiver Notification Letter.
3) Projects will be notified on an individual basis of the following: Dollar Amount and Percentage of the Total Award that Match is being waived; Waiver effective start and end dates; and requirement of subrecipient to revise their active SAR in the OVC Performance Measurement Tool (PMT) System within 30-calendar days of the notification.
4) NCC Staff will update the budget and save a copy of the NCC Match Waiver Notice in the electronic grant management system.
5) The VOCA Grant Administrator or designated staff will submit to OVC a match waiver spreadsheet listing all subrecipient match waivers approved in a federal fiscal year for each relevant federal award no later than 120 days after fiscal year end. This will be submitted to OVC via a Grant Award Modification (GAM) uploaded to JustGrants or in another method as requested by OVC.

The updates made to the NCC VOCA Match Waiver Policy & Procedure is effective immediately and supersedes all NCC VOCA Match Waiver Policy and Procedure guidance issued prior to November 19, 2026.

Revision Dates	**Revised By:**
May 31, 2024	Marcella Johnson
November 19, 2026	Amy Hoffman



Signature	11/19/26 Date
Amy Hoffman Printed Name	Justice and Youth Programs Director Title