



Subgrantees' Training Guide



Victims of Crime Act Victim Assistance Grant Program



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NCJ 175717

This document was prepared by Victim Services, supported by grant number OC-95-163, awarded by the Office for Victims of Crime, U.S. Department of Justice. The opinions, findings, and conclusions or recommendations expressed in this document are those of the author(s) and do not necessarily represent the official position or policies of the U.S. Department of Justice.

The Office for Victims of Crime is a component of the Office of Justice Programs, which also includes the Bureau of Justice Assistance, the Bureau of Justice Statistics, the National Institute of Justice, and the Office of Juvenile Justice and Delinquency Prevention.

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Victim Assistance Grant Program





U.S. Department of Justice

Office of Justice Programs

Office for Victims of Crime

Washington, D.C. 20531

September 1999

Dear Colleague:

The purpose of the *Subgrantees' Training Guide (Guide)* is to provide technical assistance to VOCA-funded victim services organizations in 3 areas:

- 1) Developing human resources,
- 2) Managing money and fundraising, and
- 3) Adhering to the VOCA Victim Assistance Grant Guidelines.

Following the sections on developing an organization's human and financial resources, the *Guide* includes a summary of the VOCA Assistance Grant Guidelines. We hope that it will help answer questions you may have about VOCA, the Office for Victims of Crime (OVC), and the Federal Crime Victims Fund, as well as more technical questions about VOCA's eligibility requirements, allowable expenses, and reporting requirements. The booklet ends with a short bibliography listing additional organizational management resources. **Please note that the Office of Justice Programs (OJP) *Financial Guide* prohibits the use of VOCA funds for fundraising, and the VOCA Victim Assistance grant program guidelines prohibit using VOCA funds for other administrative purposes, such as conducting needs assessments and program evaluations.**

Funding for this project was provided by OVC. The original research and writing for the publication was completed by David Migliore, a former administrator of Ohio's Crime Victim Assistance Office. We also sent the publication to several State VOCA administrators and VOCA-funded agency directors for their critical evaluation. While this publication contains no guidance on managing or developing staff, and certainly is not an exhaustive guide to managing an organization's finances, the consensus among the reviewers was that the information contained in the *Guide* would indeed be valuable to VOCA subgrantees.

We hope you will find the *Subgrantees' Training Guide* a helpful addition to your organization's library. We thank you for your outstanding work on behalf of crime victims.

Sincerely,

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ACKNOWLEDGMENTS

We extend our appreciation to the publication editors: Grace Coleman, Jackie McCann Cleland, Marilyn Schwartz, Tina Curatolo, and Fran Callanan. We also thank the publication reviewers: Virginia Beane, VOCA Victim Assistance Program Administrator, Iowa; Becky Sims, Director, Domestic Abuse Family Shelter, Inc., Laurel, Mississippi; Amy Holloway, Executive Director, Interact, Raleigh, North Carolina; Jill McArthur, Victim Advocate, Tallahassee Police Department, Tallahassee, Florida; Margaret Donnelly, former Acting Director of the New York Crime Victims Board; Corrine Pearson, Criminal Justice Counsel, Wilmington, Delaware; and Sharon Boyer, Administrator of the Ohio VOCA victim assistance grant.

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SECTION I:

EVALUATING YOUR ORGANIZATION

Organizational self-evaluation is the first step toward creating and maintaining a successful victim assistance program. Before you can attract people, money, and community support, you should be able to clearly articulate the purpose of your organization, your organization's short- and long-term goals, and what you need to do to meet those goals. A program evaluation should be conducted at least once a year, and it should incorporate feedback from everyone connected with your organization, both internally and externally.

A. A Good Checklist for Self-Evaluation

Before setting goals for your organization, review the major accomplishments your organization has achieved during the last 3 years. Next, state your organization's mission in one or two sentences. Then you will be ready to list your organization's short- and long-term goals. In doing so, consider the following questions:

Organizational Mission/Goals

- Are these goals consistent with your mission?
- Were your goals developed with input from: board, staff, consumers, volunteers, contributors, external consultants, members?
- What internal and external factors could help your organization achieve its goals?
- What factors could hurt?
- Will your goals require a change in financial support, number or type of persons served, services, volunteer support, staff, other?

- Do you have an annual plan that includes program objectives for each service area and a performance schedule?

Community Needs

- What community needs does your organization meet?
- What other organizations, profit and nonprofit, provide the same services?
- How does your organization's performance rating compare to other similar providers?
- What are the demographics of the clients served by your organization, by age, sex, race, disability, income level, language, etc.?
- Within your organization's service area, do all crime victims have access to services, regardless of their age, sex, race, disability, income level, language, etc.?
- Can your organization demonstrate public demand and support for its services?

Services Provided by Your Organization

- What services does your organization provide?
- Within your organization, do paid staff or volunteers deliver services to clients?
- List your organization's strengths and weaknesses in each service area.

Funding Sources

- What are your funding sources (businesses or corporations, service fees, foundations, income generating activities, government, individual donors, religious organizations, federated campaigns, others)?
- What noncash support do you receive (volunteers, services, goods, others)?

B. Victims of Crime Act (VOCA) Restrictions

VOCA funds may not be used to pay for administrative staff expenses or to conduct needs assessments and evaluations. (See p. 24 of this *Guide*.)

As your organization builds its financial resources and community support, remember:

Know your organization: You should be able to clearly state why your organization is needed, who it serves, how it fulfills its mission, and what resources it will need to flourish.

SECTION II:

DEVELOPING HUMAN RESOURCES

People are the key to all resources—money, services, goods, and goodwill. Because most crime victim programs have limited budgets, they need individuals to offer their time and skills free of charge, for a minimal fee, or for payment by a third party. Members of the community can contribute to a nonprofit by serving on its board of directors, volunteering to do administrative tasks, working as interns, or providing expert advice on some aspect of the agency's operations.

A. Board of Directors

The governing board of a nonprofit organization is the board of directors. Some public agencies establish advisory committees with functions similar to a board. In either case, a strong, informed board or advisory committee is critical to an agency's growth and success.

The ideal board comprises skilled, dedicated persons actively involved in your organization or community and sincerely committed to your organization's mission.

1. Developing a Better Board.

- Be creative and practical in your selection of board members. Consider people from all backgrounds.
- List the assets of each board member, such as political influence, financial or legal expertise, and money contacts. Consider the ways in which your organization can benefit from those assets.
- Make a wish list of needed resources: money, people, goods, and services. Ask board members to help secure these resources.

- Orient board members to your organization (its mission, history, accomplishments, and goals) by providing an informational packet that includes a copy of your organization's constitution, by-laws, organizational structure, budget, and other planning documents.
- Limit membership terms to generate fresh ideas and prevent leadership stagnation.
- Offer board members retreats, seminars, site visits, and similar learning experiences to keep them informed about your organization and its needs.
- Tell board members what is expected of them, including board duties and individual assignments (versus *staff* duties and assignments).
- Provide board members with regular updates on important issues, events, and resource needs. Continually ask for board members' guidance and support.
- Consider creating a special *ad hoc* advisory group to supplement your board for special purposes. Honorary celebrity chairpersons are effective in this role.
- Show appreciation. Thank board members with special social events. Recognize outstanding efforts with a special award or presentation.

2. VOCA Restrictions.

VOCA funds may not be used to pay for administrative staff expenses for board members, consultants, and others, unless these expenses are incurred while delivering direct services to victims. (See p. 24 of this *Guide*.)

As your organization builds its financial resources and community support, remember:

Know your organization: In choosing qualified candidates, keep in mind that *every board member should have something to offer—money, time, expertise, or valuable contacts*. You cannot afford inactive board members.

B. Volunteers

Almost every crime victim service program requires the help of dedicated volunteers. In fact, many victim service organizations were initiated by crime victims who volunteered their own time and knowledge to help other victims. Some programs, like local chapters of Mothers Against Drunk Driving, are operated solely by volunteers. Most programs, however, use volunteers to supplement paid staff.

1. Recruiting Volunteers.

- Seek volunteers among your organization's contributors, employees, clients, vendors, neighbors, family, and friends.
- Make lists of potential sources of volunteers:
 - *Professionals*: such as attorneys, doctors, artists, accountants, corporate retirees.
 - *Schools*: from primary to college level. Consider instructors, students, parent groups, alumni associations.
 - *Civic groups*: Kiwanis, Rotary, AARP, Junior League, auxiliary members.
 - *Local businesses*: from small businesses to large corporations.
 - *Government*: Federal, State, county, or local government personnel, such as police/fire/emergency department staff.
 - *Other*: staff of foundations or other nonprofits, members of local clergy and churches, local entertainers, and media personalities.

- Continue to list within lists until you get to individual names.
- Plan a recruitment strategy, including personal visits, phone calls, letters, newsletter articles, posters, brochures, and public service announcements.
- Participate in agency/community fairs by setting up an information table.

2. Running a Great Volunteer Program.

- Ask your staff how much and what kind of volunteer assistance they need.
- Develop volunteer job descriptions and training procedures.
- Ensure that your organization has desk space, computer equipment, a telephone, and other supplies that volunteers will need to do their work.
- Orient all volunteers to your organization.
- Train volunteers to do their assigned tasks.
- Provide volunteers with ongoing supervision and encouragement.
- Provide volunteers with ongoing supervision and encouragement. (Some ideas are worth repeating.)
- Treat volunteers as if they are paid staff—assign real responsibilities and hold them accountable.
- Regularly inform volunteers about expenses that may be tax deductible such as mileage, parking fees and tolls, and donated money and goods.
- Smile through the “no-shows” and “simply socializers.” The pluses of a good volunteer program really do outweigh the minuses.
- Show appreciation in every way possible: coffee and donuts, thank you notes, newsletter features, recognition dinners, special awards.

As your organization builds its financial resources and community support, remember:

Have fun: Include time for fun in your planning. Though most people participate for the cause, they are more likely to help again if they had a good time.

C. Interns

Interns can be a wonderful resource for nonprofit organizations. Students nearing graduation from high school, college, or graduate school offer their time and skills at no charge or for a stipend, and in return gain valuable on-the-job experience. Some educational institutions give students academic credits for their intern experience. The duration of an internship usually is limited to the length of a school term or summer break, from 2 to 4 months.

Some nonprofits complain that interns require too much management, and once trained, they leave. Other organizations, including corporations and foundations, use interns effectively, occasionally retaining their services on a permanent basis. Most organizations find that interns' contributions far outweigh the effort it takes to manage an intern program. In addition, today's interns will be tomorrow's professionals, who will be more knowledgeable and supportive of your organization as a result of their internships.

1. *Creating a Successful Intern Program.*

- Develop job descriptions listing specific projects and tasks and describing the professional experience the interns will gain.
- Contact local colleges, institutes, technical schools, and job advisory services several months in advance of the time that you will want the interns to begin working.
- Meet with the school's intern program manager and prospective interns. Discuss individual requirements, goals, time schedules, and payment (if a paid position).

- Be frank when describing job duties to prospective interns. If the position requires administrative, as well as substantive work, say so. Letting interns know what to expect minimizes the chance that they will disappoint you by dropping out of the program.
- Assign specific projects to interns rather than general duties. Specific projects or tasks are easier for interns to manage and ultimately more rewarding for the intern to complete. Assigning projects also makes it easier for staff to evaluate an intern's work.
- Provide ongoing supervision, guidance, and evaluation. Provide constructive feedback that emphasizes the intern's strengths. An internship should be a positive learning experience.
- Ask interns to evaluate your intern program. Learn how to do it better the next time.
- If dissatisfied with a school's intern program, try another. A new adviser may make the difference. Don't be afraid to ask for skills and terms that work best for you.

As your organization builds its financial resources and community support, remember to:

Learn to share: Invite staff, your board of directors, volunteers, and interns to contribute their ideas, experiences, and solutions to problems. Listen and be willing to implement good ideas.

D. Consultants

A "consultant" is anyone with skills or knowledge that can benefit your organization. After reviewing every aspect of your organization's operations—facilities, staff training, marketing, fundraising—seek consultants who can help you improve. Consultants may offer short- or long-term assistance to an organization. Some consultants may agree to donate their services; however, when you do pay for services, request a nonprofit or government discount.

1. Seeking the Aid of a Consultant.

- Contact special interest groups such as professional organizations, unions, and retired executives that have skills and knowledge needed by your organization. For example, ask an electrician to donate electrical plans for a building project, or an accountant to help modernize your organization's bookkeeping system, or a computer programmer to help your organization meet its technology needs.
- If a prospect is too busy or otherwise unavailable, request a referral. Keep asking until you get what your organization needs.
- In working with consultants, be flexible and considerate. Even a brief consultation by phone can be extremely effective for short-term solutions.

Example: The National Executive Service Corps is a national network of retired executives. They offer professional expertise in business, finance, communications, and advanced technologies to nonprofit

organizations at no charge or on a sliding fee scale based on ability to pay. Their mailing address is 120 Wall Street, New York, NY 10005; phone number, 212-269-1234.

2. VOCA Restrictions.

VOCA funds may not be used to pay for salaries, fees, and administrative expenses associated with administrators, board members, directors, consultants, coordinators, and other individuals, unless these expenses are incurred while providing direct services to crime victims. (See p. 24 of this *Guide*.)

As your organization builds its financial resources and community support, remember:

Ask for what your organization needs: Most people will not know you need their help unless you ask, and ask again. Ask members of your community to contribute their time, skills, and knowledge to increase and improve the services your organization is able to deliver.

SECTION III:

MANAGING MONEY, FUNDRAISING, AND COMMUNITY SUPPORT

A. Internal Money Management

The road to an organization's financial health begins with an honest evaluation of its financial situation. Sound money management also reassures potential donors that you'll use their money wisely. In assessing your organization's fundraising needs, begin by asking yourself the following questions:

- Has your organization cut unnecessary expenses?
- Have you tried sharing costs with other organizations?
- Are you making money with the money you have?

1. Money-Saving Suggestions.

- Salaries and benefits are a major cost. Enforce productivity standards and conduct employee evaluations at least annually. Use volunteers at every opportunity.
- Avoid duplication of efforts and documents. Make sure that staff responsibilities do not overlap. Share records and route paperwork.
- Get accounts receivable off your desk and into the bank.
- Avoid penalties and late charges. Pay taxes and bills on time.
- Make a payment schedule and stick to it.
- Conduct a lease versus purchase study when considering equipment acquisitions.
- Maintain facilities and equipment. Deferred maintenance is expensive.
- Review insurance coverage and costs annually. Get new bids at least every 3 years.

- Investigate ways to share costs with other nonprofit organizations. Possibilities include jointly purchased goods, equipment, and services; shared office space, equipment, and services; and group purchase of medical and other insurance.
- Ask everyone closely associated with your organization to suggest ways to cut costs.
- Institute a money-saving suggestion box and award a monthly prize for the best idea.
- If your organization's financial situation is critical, ask a management expert to consult with you about the best ways to tackle financial problems both in the short run and the long term.

2. Financial Planning/Investment Tips.

- Seek the advice of a financial investment professional.
- Determine the agency's cash needs for the next 12 months.
- Compare the checking account programs offered by local financial institutions. Beware of the hidden service charges associated with interest-bearing accounts.
- Get to know your banker and other financial experts. Their free advice can be invaluable. Consolidate all necessary operating funds into one checking account, and possibly a second account for payroll. Whether you have one or more checking accounts, payroll should always be accounted for separately. Track separate fund accounts through separate bookkeeping entries.

- If your organization has substantial discretionary cash on hand, consider investing it in a *Money Market Account* that offers fund liquidity and higher earnings than interest-bearing checking accounts. (This suggestion is not applicable to Federal grant monies.)
- If your organization can operate without a portion of its funds for 6–12 months, consider investing in a *Certificate of Deposit (CD)* or other fixed-term, fixed-rate investment. (This suggestion is not applicable to Federal grant funds.)
- If your organization’s cash assets are sizable, consider long-term investments such as stocks, bonds, and real estate.
- When selecting a Chief Financial Officer or Controller, do not assume that hiring a certified public accountant (CPA) will guarantee knowledge of your organization’s financial needs. Hire someone who has demonstrated success in managing the finances of an organization similar to yours.
- Your accounting system must be able to separately account for and report on the obligations, expenditures, and receipts associated with each grant the organization manages.
- Establish formal written accounting policies and procedures, including travel and procurement. In designing these organizational policies and procedures, consider using Federal travel and procurement regulations as the baseline standard.

3. VOCA Restrictions.

The Office for Victims of Crime prohibits grant recipients from investing grant funds. Noncompliance with this or other grant conditions can result in losing grant funds and can jeopardize future funding from the granting agency (as set forth in the Office of Justice Programs (OJP) *Financial Guide*, Part III, Chapter 1). Other grantors may allow grantees to invest grant monies. Be sure to understand and follow the grant conditions set by the granting organization.

B. Other Income-Producing Ideas

In addition to charging for services, other income-generating possibilities include the manufacture and sale of products and the sale of products purchased for resale, such as cookies, greeting cards, art and wildlife posters and calendars, and community and celebrity cookbooks. Although the risks can be great (over half of all new commercial businesses fail in their first year and nonprofits have an even higher rate of failure), many nonprofits are finding creative ways to turn their skills into successful money-making enterprises.

1. Before Undertaking a Business Venture.

- Define the type of business your organization will sponsor, as well as the market, growth potential, and competition.
- Talk to other nonprofits about the challenges and benefits of their business ventures.
- Develop a business plan. Include preliminary budgets, funding sources, projected cash flow, and projected profit/loss for the first 3 years.
- Get financial and tax advice from experts such as an attorney, accountant, banker, IRS specialist, and representatives of the Small Business Administration.
- Identify the staff who will be involved in the income-producing projects, for what percentage of their time, and at what cost to your organization. Make sure the business doesn’t detract from your victim services.

Example: By teaching persons with disabilities to refurbish donated household goods, Goodwill Industries fulfills its primary purpose of rehabilitating individuals while generating income from selling the items in its retail stores. Goodwill also earns funds by contracting with local businesses to assemble, collate, and package a variety of manufactured goods in its sheltered workshops.

C. Fundraising

Most victim assistance programs must do some fundraising, either by hiring a fundraising consultant or by using in-house staff. Whichever means you choose, remember that individual giving accounts for nearly 90 percent of all charitable contributions in America, so it should be a mainstay of support for your organization.

1. VOCA Restrictions.

VOCA funds may not be used to pay for fundraising or administrative staff expenses. (See p. 24 of this *Guide*.)

2. Tips for Hiring a Fundraising Consultant.

If you hire a fundraiser, make sure he or she has the skills to help your organization. If the consultant is knowledgeable about victim services, the learning curve will be shorter; however, fundraising skills are easily transferable, so do not be too concerned if your consultant has not worked for an agency exactly like yours. Other tips include the following:

- Oral agreements may be difficult to enforce, so put the contract into writing. Do not accept a preprinted contract; the contract should reflect your organization's needs and your expectations.
- Fundraising consultants may be paid for their services by a flat fee, commission, or a percentage of the funds raised.
- Your organization's legal counsel should participate in contract negotiations with the fundraising consultant and review the contract to ensure that it protects your agency's rights.
- Craft the contract to discourage the consultant from increasing his/her compensation at the expense of building relationships with long-term supporters. Shortcuts that harm these relationships will ultimately undermine your fundraising program.

3. Starting an In-House Fundraising Program.

Most organizations manage in-house fundraising because they have learned that internal programs establish stronger ties with the community. Below are suggestions to improve your organization's fundraising efforts.

- First ask your board members for donations; others will follow their lead.
- Develop a list of prospective donors from volunteers, clients, employees, local businesses, unions, retirees, civic groups, professional associations, government agencies, schools, religious organizations, media outlets, political organizations, neighbors, family and friends, meeting sign-up sheets, phone books, and special interest directories.
- Consult *The Coles Directory* for phone numbers listed by neighborhoods and the most recent *Census of Population* for neighborhoods listed by income levels. These references are available at most public libraries.
- Analyze the demographics of the target population. Don't waste money targeting the wrong parties or using methods that will be ineffective with a given population.
- Recruit volunteers for your organization's fundraising projects.
- Inform everyone who has contact with your organization about your fundraising needs through followup letters, thank you notes, new program announcements, achievement awards, and research findings.
- Keep a record of each person your organization solicits for future reference, according to whether he or she is a current giver, former giver, or new contact.
- Maintain a database record of contacts to track donor history and generate mailing labels more easily.

- Continually measure your costs in time and money against funds raised. Allow time for success but know when the return is not worth the effort.

4. Ways to Solicit Donations.

a. Door-to-Door Canvasses: The more direct and personal a fundraising method is, the more effective it is. This puts door-to-door canvassing at the top of the list. Your organization must be willing to dedicate plenty of time, possibly year-round, for planning and managing a successful door-to-door campaign. Although most of the gifts will be small, they will be numerous, and people remember the causes they support, regardless of the amount they donate.

Door-to-Door Canvassing Tips

- Abide by local rules regulating the solicitation of charitable donations, such as providing volunteers with solicitation permits and identification.
- Provide an orientation for volunteers and equip them with a solicitation script, fact sheets describing your organization and how the donated monies will be used, and pens and blank paper to record any questions or complaints that your office can respond to later.
- Remember that people give more readily to neighbors than to strangers, so your efforts should be concentrated in areas where your solicitation team is known.
- For efficiency and profitability, concentrate door-to-door sales or solicitations in high-density, middle-income neighborhoods.
- Challenge local schools, colleges, or community groups to compete for a prize for collecting the most money.
- Thank contributors and give receipts.

b. Special Events: Special events offer more than just money—they offer community visibility and new donor prospects. Auctions, bingo, celebrity

events, dances, excursions, flea markets, and galas are a few of the countless options available to your organization. It is necessary to do thorough research before undertaking any special event. You also will need dedicated volunteers and at least minimal funds for operating and promotional costs.

Organizing Special Events

- Recruit volunteers for a central planning committee. A year in advance is not too soon to start on major events.
- Develop a budget and planning schedule and stick to them.
- Keep detailed records of contacts, expenses, and receipts.
- Allow plenty of time for planning and developing community support. Too many great ideas fail due to poor organization.
- Be creative. Choose an event that relates to your work or takes advantage of current events.
- Seek broad-based community support. Ask students, businesses, employee groups, and civic organizations to serve as sponsors, participants, or underwriters.
- Annualize your most successful event. Turn it into a major fundraiser.
- Ask community groups to sponsor special events for you.
- Publicize events through members, volunteers, and the general public. Use posters, flyers, bulletin board notices, and announcements in newsletters, employee and civic group publications, school public address systems, radio, television, cable TV stations, local papers, and other standard promotional methods. Ask for *pro bono* service from advertising and public relations firms.

c. Canisters: Canisters increase the organization's visibility and remind discretionary spenders of your cause and need. The Salvation Army Christmas pot

and collection boxes placed near cash registers are examples of canisters.

d. Phone-a-Thons and Telethons: Phone-a-thon costs are relatively small, and results are usually profitable. Some businesses are willing to donate office space, telephones, and other needed equipment. This method requires good organization and a firm commitment of volunteer time. Volunteers phone potential givers, and respondents who pledge a gift are mailed a thank you letter and invoice for the amount pledged. Volunteers make followup calls to remind donors who do not honor their pledges within a specified time period.

A telethon is a televised phone-a-thon. Rather than phoning prospects, volunteers wait for viewers to call them following regular on-air appeals, usually by celebrity guests. Before organizing a telethon, be aware that it will require tremendous time and resources. Television time must be donated or purchased, and celebrities must be booked. Most telethons raise a majority of their pledges ahead of time and use the event to announce the gifts, thereby gaining visibility and attracting new prospects.

e. Payroll Deductions: Some employers give their staff the option of making charitable donations via payroll deductions. Many employers collect for only one charity, so the selection process can be very competitive. Still, it might be worth the effort to try to implement a payroll deduction program. The United Way is the best known payroll deduction federation. Contact your local United Way for more details.

In payroll deduction programs, member organizations agree to limit individual fundraising in favor of group solicitation. The federation handles all solicitation, collection, and allocation, reserving a percentage of funds raised for administrative expenses. Member agencies are allotted money by citizen review committees based on various criteria, including community need. Both employers and members save on administrative costs. However, membership is not guaranteed. Some federations have been criticized for being slow to add new organizations. Allocations

are not always sufficient to make up for restrictions on individual fundraising. Still, federations continue to be a mainstay of individual donations.

f. Direct Mail: Direct mail is an excellent way to reach large numbers of people. The process is straightforward—develop a mailing list, prepare a letter soliciting donations, and mail the letter bulk rate. Although it sounds easy, direct mail is expensive, involving considerable overhead costs for paper, printing, postage, and staff time. It also has a low rate of return—on average, only 1 percent of those mailed respond with a donation.

Some organizations have determined that hiring a direct mail company is the most efficient way to reach new donors, but most have established their own in-house programs. There are many excellent books you might consult for practical suggestions on creating or improving your direct mail efforts. You might also ask another nonprofit organization to share its experiences.

g. Matching Gifts: Many companies encourage employee support of nonprofits through matching gifts programs where employers match worker contributions, such as \$2 for every \$1 employee donation, up to a specified maximum. In addition to cash gifts, some employers match the cash value of employee donations of real estate, art, bequests, and life insurance. A few match payroll deductions. Some companies contribute to organizations where their employees volunteer time based on a dollar/hour formula. Contact employers directly to initiate a program, expand an existing program to include your organization, or encourage an increase in the company's giving ratios.

Starting a Matching Gifts Program

- Obtain a list of companies with matching gift programs from the Council for the Advancement and Support of Education (CASE), 11 Dupont Circle, Washington, DC 20036.
- Create a list of your community's matching gift companies. Distribute to potential donors.

- Promote matching gifts through your organization's newsletters, direct mail, and phone-a-thon campaigns.
- Acknowledge gifts from both the donor and the matching donor.
- Keep accurate records of gifts pledged and received.
- Send thank you notes for pledges and gentle reminders if the matching gift is not received within a reasonable time period.

h. Annual Giving: Every program needs a core of loyal supporters, including individuals, foundations, and private companies, that can be counted on to make a donation every year.

Organizing an Annual Campaign

- Set fundraising goals and collection deadlines that reflect your organization's annual budget.
- Review individual donor records to determine whether and how much to increase pledge request amounts in the upcoming year.
- At the same time each year, send annual contributors a personal letter from the agency's executive director or the board chairperson requesting a pledge for a specified amount.
- Once donors make their pledges, your organization should send an acknowledgment as quickly as possible. Prepare thank you letters in advance so your board president or executive director can sign and perhaps add a personal note.
- Consider honoring very substantial gifts with a special award or event.
- Throughout the year, keep your donors informed about the organization's activities and the need for their continuing support via newsletters, annual reports, progress reports, invitations to special events, phone calls, and personal visits.
- Add new prospects to your list regularly.

i. Memorials and Tributes: Many nonprofits benefit from the custom of honoring a friend or

loved one with a memorial (deceased) or tribute (living). Although not a major source of support, these gifts provide unrestricted income and increased community visibility.

Tips for Memorial and Tribute Gifts

- Solicit memorial and tribute donations indirectly through reminders in newsletters and other regular communications with members and friends, as well as in informational or fundraising brochures.
- Suggest occasions for making tribute gifts such as birthdays, anniversaries, and retirements.
- Consider publishing memorials and tributes in newsletters or annual contributor reports.
- Recognize major memorial gifts by naming a special fund, room, or section of a building in honor of the person memorialized.
- Send acknowledgments to both the contributor and the person or family of the person in whose name the gift has been made.

j. Planned Giving: Planned giving, or deferred giving, is the making of charitable gifts through wills, trusts, gift annuities, life insurance, securities, and real estate. This type of program encourages increased giving in the present *and* the future, thereby decreasing vulnerability to changing economic trends.

A comprehensive planned giving program requires expertise in estate planning, law, taxes, and investments. However, a planned giving program can be initiated on a small scale by your organization's executive director and volunteers with expertise in financial planning. In time, with support from a strong board of directors, you can have a full-scale program. Any planned giving program will take from 3 to 5 years to show significant results.

Types of Planned Gifts

Listed below are a number of different types of planned gifts. Each offers special advantages based on tax laws and donor needs.

- **Bequests:** A gift made to a charity through a donor's will.
- **Life Insurance:** A nonprofit can be an assignee of annual policy dividends, annuity payments, maturing endowments, and cash surrenders.
- **Charitable Trusts:** Money or property given in a trust to a charitable organization in return for tax benefits and a fixed dollar or percentage income for the donor's lifetime, or as otherwise specified.
- **Charitable Gift Annuities:** Cash or securities given for a fixed amount of annual income and tax benefits.
- **Life Estate Contract:** Real estate donated in return for tax advantages and the lifetime use of the property by the donor.
- **Securities:** Stocks and bonds donated outright in favor of reduced taxes.
- Periodically contact local life underwriters and estate attorneys. Remind them of your willingness and ability to assist clients with their estate planning needs.
- Once an individual becomes a planned giver, maintain regular communication. Recognize special contributors through an annual dinner or other social event.
- Publicize significant gifts through news releases, with donor permission.
- Cultivate associations with planned giving experts such as attorneys, financial trust officers, investment brokers, CPAs, tax specialists, and insurance underwriters. Most of these professionals will be happy to share general information with your organization.

Organizing a Planned Giving Program

- Begin with research. Get all the facts and figures and sell the idea to your board of directors.
- Survey your organization's current contributors to establish a donor profile. Most planned givers come from the top 3 percent of regular donors, but small contributors may be rich in property or securities. Develop a marketing plan and solicit accordingly.
- Offer will and estate planning workshops. If individualized attention seems appropriate, suggest personal consultations with an attorney.
- Promote planned giving among your organization's financial supporters by providing information in your newsletters and annual reports about will and estate planning, changes in tax laws, and the availability of will and estate planning workshops.
- Solicit regular contributors—your prime prospects—through direct mail pieces, special fundraising newsletters and brochures, telephone calls, and personal visits.
- k. Endowments and Foundations:** Some programs take planned giving one step further and establish their own endowment or foundation. All contributions are pooled into a single fund and invested, ensuring permanent interest income. Donors enjoy knowing they are helping to perpetuate a favorite charity, and organizations gain important protection against destabilizing variations in other sources of funding. The creation of an endowment or foundation involves complex legal and financial issues, requiring the guidance of professionals.
- l. Types of Grants:** Common types of grants include the following:
 - **Capital:** Funding for land acquisition, building construction, and large equipment purchases.
 - **Challenge or matching:** Funding awarded only if the nonprofit raises a matching amount.
 - **Emergency:** Grants that assist nonprofits experiencing unexpected or temporary financial problems.
 - **Endowment:** Investment funds that provide regular income to the recipient organization.
 - **General support or unrestricted:** Funds that may be used for a broad range of organization needs, including general operations.

- **Research:** Grants for medical, educational, and other types of research activities.
- **Seed:** Startup funding for a new program or organization.
- **Technical assistance:** Grants awarded for technical training of staff, such as computer operations.

m. Sources of Grants: Grants are made by foundations; corporations; and government, civic service, and religious organizations. Brief descriptions are provided below.

i. Foundations. Created for the purpose of establishing or maintaining charitable, educational, religious, and social activities for the common good, these nonprofits include independent or family foundations, company foundations, community foundations, and operating foundations. For more information on foundations, contact The Foundation Center, 79 Fifth Avenue, New York, NY 10106; phone: 212-620-4230; Web site: <http://www.fdncenter.org>.

ii. Corporations. Not all corporations have company foundations to channel their charitable giving. Even those with foundations often reserve part of their gift dollars for direct giving. Although the grant-making process differs from company to company, usually a company will have a contributions committee composed of the chief executive officer and other senior management. Some corporations give preference to charities in which their employees are actively involved. Contact companies directly and ask for application criteria and deadlines.

iii. Government Agencies. Many Federal, State, and local government agencies make grants available to nonprofit organizations. To obtain application information, you might begin by inquiring at your local library, then contact the agencies directly by telephone or via the Internet to request an application.

Notification about Federal grant funding is posted in the *Federal Register*, which is available at public libraries. There are two key sites for accessing the *Federal Register* via the Internet: <http://ocd.usda.gov/nofa.htm>. This site allows searching by keywords and by Federal agency. The site that displays the *Federal Register* in its entirety is http://www.access.gpo.gov/su_docs/aces/aces140.html.

iv. Community Organizations. Civic, service, and religious organizations are good prospects for small grants for ongoing programs or special projects. Contact usually is made through the local president or other leader, though some requests may be channeled through State or national officials. Many victim assistance programs receive grants from community organizations.

n. The Grant-Seeking Process:

- Learn as much as possible about grants and grant makers to increase your opportunities for success. Sources of information include your local library, chamber of commerce, business and organization directories, the Yellow Pages, and government development and programs offices.
- Regularly review grant publications and periodicals, which can be found in public libraries.
 - *The Foundation Directory* lists foundations according to grant categories, such as capital, general operating, and research and special interest, such as art, education, and health.
 - *The Foundation Index Bimonthly* provides updates on current giving.
 - *The Federal Register* and other government publications announce available grants and application requirements.
- Request annual reports and funding guidelines from local and national corporations. Review

interests and requirements. Note special restrictions and application deadlines and procedures.

- List prospects and prioritize. Make an informal inquiry, by letter, phone, or both, to the top prospects. Briefly describe your program and need. Offer to send a formal funding proposal.
- Schedule a preliminary meeting to discuss your proposal.
- Enhance your credibility and chances for success by being realistic about the amount of funding you request.
- Report any outstanding grant proposals to funders; they will appreciate receiving this information.
- Be aware that some grant makers expect to be consulted in the early stages of project planning. This is particularly true of major project sponsors.
- If at first you don't succeed, go to the next grant maker on the list.
- Do not limit yourself to local funding sources. If your proposal is unique or of national significance, apply for funds from national grant makers.
- Send proposals only to grant makers expressing an interest in the project. Usually grant applications exceed available funds; repeated submissions of inappropriate requests may cause reviewers to pass over future proposals.
- Consider sharing a grant with another nonprofit. Innovative joint programs are gaining community and corporate support by working together. Get to know the decision makers and let them get to know you.

o. The Grant Proposal: Follow the grant maker's guidelines as you prepare your request. Grant makers want to know how their money will benefit the community and their special interests. Keep your organization's proposal brief and to the point. If you have an emotional story to tell, do it in the appendix or in a follow-up visit. **Submit the proposal by the deadline set by the grantor.**

As your organization builds its financial resources and community support, remember:

Know potential funders: You and your staff should know your current and potential funders, why they give, and what they expect in return.

Although criteria vary, most grant makers expect a proposal to include the following:

- Cover letter.
- Proposal summary (Abstract)—limit to one page; include the amount requested, total budget, project purpose, and expected results.
- Introduction to your organization's history, purpose, goals and objectives, accomplishments, service area, and population served.
- Statement of problem or need.
- Project goals and objectives.
- Staffing requirements, including job descriptions, résumés of existing staff, and recruitment and training plans.
- Implementation method and schedule.
- Strategy for evaluating project at reasonable intervals and at grant's end.
- Itemized budget, including program and operating costs, and other sources of funding.
- Future funding plans.
- Appendix, including tax-exempt letter, list of members on the board of directors, annual report, résumés of project staff, current operating budget, audited financial statement, funding sources (cash and in-kind), and letters documenting community support.

Proposals that do not respond to the granting agency's Request for Proposals (RFP) should be submitted as concept papers.

p. “Top 10” Grant-Writing Tips:

- 1) Read the solicitation carefully.
- 2) Follow the instructions, including the recommended format, such as the organization of the application package; narrative content and length; and required paper size, font, spacing, etc.
- 3) Complete all forms; leave no blanks; obtain official signatures.
- 4) Develop a program narrative that defines the problem, specifies proposed actions, states how actions will solve the problem, describes evaluation criteria, and includes source information for factual citations.
- 5) Use clear English. Avoid acronyms, unless defined, and avoid technical jargon.
- 6) Develop a budget that contains the costs of the proposal, not of the organization. Costs should be reasonable, necessary, allowable, and accurately calculated.
- 7) Ask questions; don’t guess! Call the granting agency’s contact person with questions about the grant application process.
- 8) Use pictures, graphs, and charts (if allowable and practicable).
- 9) Use independent readers to review and comment on your proposal before submitting it for consideration.
- 10) Submit your proposal on time.

q. Remain Active in the Grant Process:

Submitting the proposal is not the end of the process. Enhance your chances of being awarded a grant by “following up.”

“Following Up” Your Grant Proposal

- A day or two after submitting a proposal, call to confirm its arrival. Offer additional materials in support of the project. Arrange a personal visit to the grant maker for further discussion. Invite the grant maker to visit the site of the proposed project.
- Many corporations and foundations allow their board of directors or contributions committee to make grant decisions. Learn when the decision committee is meeting and call the day before to see if you can provide any additional information.
- Grant decisions can take from a few weeks to more than a year. Plan accordingly, and be patient, but persistent, in checking the progress of your organization’s proposal.
- If awarded the grant, send a thank you letter and submit regular progress reports on the project.
- Acknowledge rejections with a thank you letter.
- Keep detailed records of all grant activities, including contacts and payments, in accordance with the requirements of the grant-making organizations supporting your program.

As your organization builds its financial resources and community support, remember:

Balance creativity and efficiency. *Great ideas supported by thorough planning rarely fail!*

SECTION IV:

VOCA, OVC, AND SUBGRANTEE GUIDELINES

A. VOCA, Crime Victims Fund, and OVC Background

The Victims of Crime Act of 1984 (VOCA, 42 U.S.C. 10601 *et seq.*) authorizes Federal financial compensation for victims of crime and financial support for State and local agencies that provide services to crime victims. Legislators concluded that the needs of crime victims could be adequately met only if the private sector and the Federal, State, and local governments shared the responsibility of providing assistance to victims. To meet these goals, VOCA established the Crime Victims Fund and the Office for Victims of Crime (OVC) within the U.S. Department of Justice.

The Crime Victims Fund is a U.S. Treasury account generated entirely by the fines and penalties levied against criminals convicted of Federal crimes. The Fund finances the VOCA Victim Assistance and Compensation Grant Programs.

OVC works with international, national, State, military, and tribal victim assistance and criminal justice agencies, as well as other professional organizations, to promote fundamental rights and comprehensive services for crime victims. OVC is responsible for administering the Crime Victims Fund and overseeing the Federal administration of VOCA grant programs.

Each State, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands (hereafter referred to as a State) receive an annual VOCA victim assistance grant. In all, VOCA victim assistance funds support more than 3,000 local victim services, such as domestic violence shelters, child advocacy centers, and rape treatment programs.

Time Limit To Use Funds! Funds are available for expenditures only during the grant period specified by each State's VOCA Assistance Grant Administrator and in accordance with VOCA. Funds not used by the end of a State's grant period cannot be carried over by the local subgrant recipient and must be returned to the Fund. In a given year, no more than \$500,000 can be returned to the Fund from the States. Amounts in excess of \$500,000 shall be returned to the Treasury. Therefore, Administrators are encouraged to closely monitor the expenditures of VOCA funds at the local recipient level and to reallocate unexpended funds before the end of the grant period so that *all* funds can be used for crime victim services.

B. OVC Training Programs and Resources

1. OVC Training and Technical Assistance Center.

The OVC Training and Technical Assistance Center (TTAC) helps improve services to crime victims by providing, at no cost to State agencies, skilled trainers to conduct workshops and seminars, and experienced professionals to give on-site technical assistance. For further information, call 800-627-6872. Topics covered by TTAC include:

- The Trauma of Victimization.
- Crisis Response Team Training.
- Stress Management for Care Givers.
- Crime Victim Compensation Programs.
- Legal Rights of Victims.
- Advocacy for Victims in the Criminal Justice System.

- Domestic Violence.
- Sexual Assault and Abuse.

2. OVC Resource Center.

A component of the National Criminal Justice Reference Service (NCJRS), the OVC Resource Center (OVCRC) maintains a library of publications and videotapes published by the following agencies:

- National Institute of Justice.
- Office of Juvenile Justice and Delinquency Prevention.
- Office for Victims of Crime.
- Bureau of Justice Statistics.
- Bureau of Justice Assistance.
- Office of National Drug Control Policy.

You can reach the staff of the OVC Resource Center at 800–627–6872. They will be happy to give you more information about using OVCRC’s many services.

C. Autonomy of the States in Subgranting VOCA Funds

The primary purposes of the VOCA victim assistance grant program are to provide high-quality, direct assistance to crime victims; to assist crime victims as soon as possible after the crime occurs to reduce the severity of the psychological consequences of the crime; to improve the victim’s willingness to cooperate with the criminal justice process; and to restore the victim’s faith in the criminal justice system.

To this end, VOCA requires each State to designate a State agency to develop a strategy for responding to the needs of crime victims and to administer the funds accordingly. The State agency is responsible for selecting the service organizations that will receive funding and the level and length of time to continue funding. The State is also responsible for establishing its own policies and procedures for administering the funds,

including developing the application, award, and appeals processes, and implementing effective grant monitoring protocols.

The following pages detail the **minimum** criteria set forth in VOCA and OVC’s Program Guidelines. However, VOCA State Administrators may establish additional criteria to serve the crime victims within a given State most effectively and to satisfy State requirements. For information about the application process and program guidelines in your State, consult with your VOCA State Administrator.

D. Program Eligibility Requirements for Subgrantees

Each subgrantee organization receiving VOCA funds must meet the following requirements:

1. Public or Nonprofit Organization.

Subgrantee organizations must be operated by a public or nonprofit organization, or a combination of such organizations.

2. Record of Effective Services.

Organizations must demonstrate a record of providing effective services to crime victims. Criteria include: community support, a history of providing direct services in a cost-effective manner, and financial resources other than the VOCA grant.

3. New Programs.

Programs that have not yet demonstrated a record of providing services may still be eligible to receive VOCA funding if they can demonstrate that 25–50 percent of their financial support comes from non-Federal sources. The purpose of requiring organizations to have a variety of funding sources besides Federal funding is to ensure their financial stability. The VOCA State Administrator establishes the base level of non-Federal support within the 25–50 percent range and is responsible for determining that the program meets that required level of support.

4. Project Match.

Project match may be in the form of either cash or in-kind contributions as stipulated by the VOCA State Administrator. Cash contributions refer to an applicant's cash outlay, including non-Federal money contributions from public agencies and institutions and private organizations and individuals. In-kind contributions refer to the value of noncash contributions such as donations of expendable equipment, office supplies, workshop or classroom materials, and work space, or the monetary value of time contributed by professionals, technical personnel, and other skilled and unskilled labor if the services they provide are an integral part of a funded project.

a. VOCA Requires 20-Percent Match: As a condition to receive VOCA funds, OVC requires all subgrantees to provide matching contributions of 20 percent (cash or in-kind) of the total cost of each VOCA project (VOCA grant plus match), which must be derived from non-Federal sources, except as provided in Part III, Chapter 3 of the OJP *Financial Guide*. (See p. 25 of this text for more information.) In some States the project match may be significantly higher than the 20-percent minimum required by OVC, so be sure to consult with your VOCA State Administrator to verify your State's match requirements. Organizations are encouraged not to match in excess of the amount required by your State Administrator so as not to unnecessarily restrict resources that could be used for other purposes.

b. Match Exceptions: OVC sets a lower match requirement for Native American Tribal Governments and most U.S. Territories, as described below.

- **Native Americans:** For VOCA subgrantees that are Native American tribes or organizations located on reservations, the match is 5 percent of the total VOCA project (VOCA grant plus match). A Native American tribe or organization is described as any tribe, band, nation, or other organized group or community that is eligible for the special programs and services provided by the United States to Native Americans because of their status as Native Americans. A reservation is

defined as a tract of land set aside for use of, and occupancy by, Native Americans.

- **Most U.S. Territories:** Local VOCA subgrantees located in all territories and possessions of the United States, except Puerto Rico, are not required to match the VOCA funds.

c. Match Use Restrictions: All funds designated as match are restricted to the same uses as the VOCA victim assistance funds and must be expended within the grant period. Match must be provided on a project-by-project basis. Any deviation from this policy must be approved by OVC.

d. Assessing Match Value: The value placed on donated services must be consistent with the rate of compensation paid for similar work in the subgrantee's organization. If the required skills are not found in the subgrantee's organization, the rate of compensation must be consistent with the labor market. In either case, fringe benefits may be included in the valuation. The value placed on lent or donated equipment may not exceed its fair market value. The value of donated space may not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in privately owned buildings in the same locality.

e. Calculating Project Match: If the VOCA award is \$30,000, the 20-percent match is computed by dividing the amount of the award by 0.80 and subtracting the amount of the award from the figure obtained. Thus, an organization that receives a \$30,000 VOCA award would be required to provide \$7,500 in match ($\$30,000/0.80 = \$37,500$, less the \$30,000 award amount, for a match totaling \$7,500).

f. Match Documentation: Local programs that receive VOCA funds must maintain records that clearly show the source, the amount, and the period during which the match was allocated. The basis for determining the value of personal services, materials, equipment, and space must be documented. Volunteer services must be documented and, to the extent feasible, supported by the same methods used by the subgrantee for its own paid employees.

All matching contributions must be:

- Verifiable from the applicant's records.
- Not included as a contribution for any other Federal funds.
- Necessary and reasonable to accomplish the project's goals.
- Allowable charges.
- Not paid by the applicant from Federal funds received under another assistance agreement.
- Included in the budget approved by the VOCA State Administrator.
- In accordance with all other Federal and State requirements.

5. Volunteers.

Organizations must use volunteers unless there is compelling reason to waive this requirement and a waiver is granted by the VOCA State Administrator. A "compelling reason" may be a statutory or contractual provision concerning liability or confidentiality of counselor/victim information, which bars using volunteers for certain positions, or the inability to recruit and maintain volunteers after a sustained and determined effort.

6. Community Efforts To Aid Crime Victims.

Organizations must promote, within the community, coordinated public and private efforts to aid crime victims to ensure continuity of support to the victim and to avoid duplication of effort. Promoting coordination of efforts may include having service providers serve on Federal, State, local, or Native American task forces, commissions, working groups, or multidisciplinary teams. Coordination efforts may also include developing written agreements that contribute to improving services to crime victims. Coordination activities qualify an organization to receive VOCA victim assistance funds, but they cannot be supported with VOCA funds.

7. Crime Victim Compensation Benefits.

VOCA-funded organizations must help victims apply for compensation benefits. Assistance may include identifying and notifying crime victims of the availability of compensation, assisting them with completing application forms, obtaining documentation needed to process claims, or checking claim status.

8. Compliance With Federal Rules Regulating Grants.

Subgrantees must comply with the applicable provisions of VOCA, OVC Program Guidelines, VOCA Victim Assistance Program Guidelines, and the OJP *Financial Guide*. (See p. 25 of this text for more information.)

9. Maintain Civil Rights Information.

Organizations must maintain statutorily required civil rights statistics on the victims they served by race, national origin, sex, age, and disability, within the timetable established by the VOCA State Administrator. Subrecipients must also permit reasonable access to books, documents, papers, and records to determine whether the recipient is complying with applicable civil rights laws. This requirement is waived for services such as telephone counseling where soliciting the information may be inappropriate or offensive to the victim.

10. Compliance With State Criteria.

Subrecipients must abide by any additional eligibility or service criteria established by the VOCA State Administrator, including submitting statistical and programmatic information on the use and benefits of VOCA funds.

11. Services to Victims of Federal Crimes.

Subgrantees must provide services to victims of Federal crimes on the same basis as victims of State and local crimes.

12. No Charge to Victims for VOCA-Funded Services.

Any deviation from this provision requires prior approval from the VOCA State Administrator. Prior to requesting approval to generate income, VOCA subgrantees should carefully weigh the following considerations:

a. Charitable Intent of the Program: The purpose of the VOCA victim assistance grant program is to provide services to all crime victims, regardless of their ability to pay for services, availability of insurance, or other third-party payment resources. It is not the intent of VOCA to exacerbate the emotional, physical, and financial impact of the crime by asking the victim to pay for services.

b. Accountability for Program Income: All VOCA grant recipients must have the capability to track program income in accordance with Federal financial accounting requirements. All VOCA-funded program and match income restricted to the same uses as the VOCA funds. Tracking VOCA-funded program income and ensuring that it is used only to make additional services available to crime victims can be difficult. For example, VOCA funds often support only a portion of a counselor's time. Accounting for VOCA program income generated by this counselor involves careful record keeping by the counselor, the grant recipient organization, and by the VOCA State Administrator.

13. Confidentiality of Personal Information.

Organizations must maintain the confidentiality of client-counselor information, as required by State and Federal law.

14. Confidentiality of Research Information.

Except as otherwise provided by Federal law, no recipient of monies under VOCA shall use or reveal any research or statistical information furnished under this program for any purpose other than the purpose for which such information was obtained in accordance with VOCA. Such information shall be

immune from legal process and shall not, without the consent of the person furnishing such information, be admitted as evidence or used for any purpose in any action, suit, or other judicial, legislative, or administrative proceeding. Section 1407(d) of VOCA at 42 U.S.C. 10604.

These confidentiality provisions do not override or repeal any existing laws governing the disclosure of information that helps crime victims. For example, these provisions would not act to override or repeal State law regarding the mandatory reporting of suspected child abuse. The confidentiality provisions also should not be interpreted to thwart the legitimate informational needs of public agencies, such as a domestic violence shelter responding to a law enforcement inquiry during a missing person investigation that the person is safe in the shelter. Similarly, the provisions do not prohibit victim service projects from providing Federal or State agencies with information about whether Federal and State funds are being used in accordance with funding agreements.

E. Allowable Services, Activities, and Costs

1. Direct Services.

VOCA victim assistance funds may be used to purchase the following services and activities:

a. Services That Meet the Immediate Needs of Victims: Services that respond to the immediate emotional and physical needs (excluding medical care) of crime victims, such as crisis intervention, accompaniment to hospitals for medical examinations, hotline counseling, emergency food, clothing, transportation, and shelter (including emergency, short-term nursing home shelter for elder abuse victims for whom no other safe, short-term residence is available), and other emergency services that are intended to restore the victim's sense of security. This includes services that offer an immediate measure of safety to crime victims, such as boarding up broken windows and replacing or repairing locks. Also allowable is emergency legal assistance such as filing restraining orders and

obtaining emergency custody or visitation rights when such actions are directly connected to family violence cases and are taken to ensure the health and safety of the victim.

b. Psychological Services: Services and activities that assist the primary and secondary victims of crime in understanding the dynamics of victimization and in stabilizing their lives after a victimization, such as counseling, group treatment, and therapy. “Therapy” refers to intensive psychological or psychiatric treatment for individuals, couples, and family members to provide emotional support in crises arising from the occurrence of crime and the evaluation of mental health needs.

c. Legal Services: Including advocacy on behalf of crime victims; accompaniment to criminal justice offices and court; transportation to court; child care to enable a victim to attend court; notification of victims regarding trial dates, case disposition information, and parole consideration procedures; and assistance with victim impact statements. Projects devoted to restitution advocacy on behalf of specific crime victims are also allowable. VOCA funds cannot be used to pay for non-emergency legal representation, such as divorces or civil restitution recovery efforts.

d. Forensic Examinations for Sexual Assault Victims: May be paid for by VOCA funds only if (1) other funding sources, such as State compensation, private insurance, or public benefits, are unavailable or insufficient and (2) such exams conform with State evidentiary collection requirements.

e. Necessary and Essential Operating Costs: Costs that are necessary and essential to providing direct services to victims, such as prorated costs of rent, telephone service, transportation costs for victims to receive services, emergency transportation costs that enable a victim to participate in the criminal justice system, and local travel expenses for service providers.

f. Addressing Immediate Practical Problems:

Services that assist crime victims with managing practical problems created by the victimization, such as acting on behalf of the victim with other service providers, creditors, or employers; assisting the victim to recover property that is retained as evidence; assisting in filing for compensation benefits; and helping to apply for public assistance.

g. Personnel Costs: Costs that are directly related to providing direct services such as staff salaries and benefits, malpractice insurance, advertising to recruit VOCA-funded personnel, and training paid and volunteer staff.

h. Meetings With Perpetrators: Opportunities for crime victims to meet with perpetrators, if such meetings are requested or voluntarily agreed to by the victim and have possible beneficial or therapeutic value to the victim. Proposals to fund this type of service are closely reviewed by VOCA State Administrators to ensure (1) the safety and security of the victim; (2) the benefit or therapeutic value to the victim; (3) the procedures for ensuring that participation of the victim and offender are voluntary and that everyone understands the nature of the meeting; (4) appropriate support and accompaniment for the victim; (5) appropriate “debriefing” opportunities for the victim after the meeting or panel; (6) the credentials of the facilitators; and (7) the opportunity for a crime victim to withdraw from the process at any time. VOCA assistance funds cannot be used for victim-offender meetings that serve to replace criminal justice proceedings.

2. Indirect Services.

The services and activities discussed in this section, though not direct crime victim services, are often necessary to ensure that quality direct services are provided. Before these costs can be supported with VOCA funds, the VOCA State Administrator and the applicant must agree that: (1) direct services to crime victims cannot be offered without VOCA support of these expenses; (2) the subgrant agency

has no other source of support for them; and (3) only limited amounts of VOCA funds will be used for these purposes. For example:

a. Skills Training for Staff: VOCA funds designated for training are to be used exclusively for developing the skills of direct service providers, including paid staff and volunteers, so they can offer quality services to crime victims.

VOCA funds can be used for training both VOCA-funded and non-VOCA-funded service providers who work within a VOCA recipient organization. But VOCA funds cannot be used for management and administrative training of executive directors, board members, and other individuals who do not provide direct services.

b. Training Materials: VOCA funds can be used to purchase materials such as books, training manuals, and videos for direct service providers, and can support the costs of a trainer for in-service staff development.

c. Training-Related Travel: VOCA funds can cover costs such as travel, meals, lodging, and registration fees to attend training within the State or a similar geographic area. This limitation encourages VOCA grant recipients to look first for available training within their immediate geographical area, so travel costs will be minimal. However, when needed training is unavailable close by, VOCA State Administrators may authorize VOCA funds to support training outside the geographical area.

d. Equipment and Furniture: VOCA funds may be used to buy furniture and equipment that provide or enhance direct services to crime victims. VOCA funds cannot support the entire cost of an item that is not used exclusively for victim-related activities, but can support a prorated share of such an item.

Examples of allowable costs may include beepers; typewriters and word processors; camcorders and VCRs for interviewing children; two-way mirrors; and equipment and furniture for shelters, work spaces, victim waiting rooms, and children's play areas.

The costs of furniture, braille equipment or TTY/TTD machines for the deaf, or minor building alterations that make victims services more accessible to persons with disabilities are allowable. Refer to Part III, Chapter 6 of the OJP *Financial Guide* for further guidance. (See p. 25 of this text for more information.)

e. Purchasing or Leasing Vehicles: VOCA grant recipients may use VOCA funds to purchase or lease vehicles if they can demonstrate to the VOCA State Administrator that such an expenditure is essential to delivering services to crime victims. The VOCA State Administrator must give *prior* approval for all such purchases.

f. Advanced Technologies: Computers may sometimes increase a VOCA grant recipient's ability to reach and serve crime victims. For example, automated victim notification systems have dramatically improved the efficiency of victim notification and have enhanced victim security.

VOCA grant recipients must describe to the State how the computer equipment will enhance services to crime victims; how it will be integrated into or enhance the recipient's current system; the cost of installation; the cost of staff training in using the computer equipment; the ongoing operational costs, such as maintenance agreements and supplies; and how these additional costs will be supported. Property insurance is also an allowable expense as long as VOCA funds support a prorated share of the insurance payments.

At minimum, subgrantees must maintain property records with the following information: a description of the property and the serial number or other identifying number; identification of the title holder; the acquisition date; the cost and the percentage of VOCA funds supporting the purchase; the location, use, and condition of the property; and any disposition data, including the date of disposal and sale price. See the OJP *Financial Guide*. (See p. 25 of this text for more information.)

g. Contracts for Professional Services: It may be necessary for grant recipients to use a portion of the

VOCA grant to contract for specialized services. Examples of these services include assistance in filing restraining orders or establishing emergency custody/visitation rights; forensic examinations on sexual assault victims to the extent that other funding sources are unavailable or insufficient; emergency psychological or psychiatric services; or sign and interpretation for the deaf or for crime victims whose primary language is not English. Grant recipients are prohibited from using a majority of VOCA funds for contracted services.

h. Operating Costs: Examples of allowable operating costs include supplies; equipment use fees, when supported by usage logs; printing, photocopying, and postage; brochures that describe available services; and books and other victim-related resources. VOCA funds may also be used to support administrative time to maintain the mandatory time and attendance sheets, programmatic documentation, reports, statistics, crime victims' records, and the prorated share of audit costs.

i. Supervision of Direct Service Providers: VOCA funds may be used for supervision of direct service providers when the State Administrator determines that such supervision is necessary. For example, the State Administrator may determine that using VOCA funds to support a coordinator of volunteers or interns is a cost-effective way of serving more crime victims.

j. Repair or Replacement of Essential Items: VOCA funds may be used for repair or replacement of items that contribute to maintaining a healthy and safe environment for crime victims, such as a furnace in a shelter. In the event that a vehicle is purchased with VOCA funds, related items like routine maintenance and repair costs and automobile insurance are allowable.

In order for VOCA funds to support these types of expenses, the applicant must provide assurance that (1) the building or vehicle is owned, not rented or leased, by the subrecipient organization; (2) all other sources of funding have been exhausted; (3) there is no available option for providing the service in another location; (4) the cost of the repair or

replacement is reasonable considering the value of the building or vehicle; and (5) the cost of the repair or replacement is prorated among all sources of income.

k. Public Presentations: VOCA funds may be used to support presentations that are made in schools, community centers, or other public forums. These presentations must be designed to help crime victims identify their own victimization and provide services to those victims who request assistance. The costs related to such programs, including presentation materials, brochures, and newspaper notices, can be supported by VOCA funds.

3. Unallowable Services, Activities, and Costs.

The following is a partial list of services, activities, and costs that *cannot* be supported with VOCA victim assistance grant funds:

a. Lobbying and Administrative Advocacy: VOCA funds cannot support victim legislation or administrative reform, whether conducted directly or indirectly.

b. Perpetrator Rehabilitation and Counseling: Subgrantees cannot use VOCA funds to offer rehabilitation services to offenders. Likewise, VOCA funds *cannot* support services to incarcerated individuals, even when the service pertains to the victimization of that individual.

c. Needs Assessments, Surveys, Evaluations, and Studies: VOCA funds cannot pay for efforts to study crime victim issues.

d. Prosecution Activities: VOCA funds cannot pay for activities that are directed at prosecuting an offender or improving the criminal justice system. These activities include witness notification, expert testimony at trials, and victim witness protection costs and subsequent lodging and meal expenses.

e. Fundraising Activities.

f. Indirect Organizational Costs: Costs of liability insurance on buildings, capital improvements, security and bodyguards, property losses and

expenses, real estate purchases, mortgage payments, and construction may not be supported with VOCA funds.

g. Reimbursement: Reimbursing crime victims for expenses incurred as a result of a crime, such as insurance deductibles, replacement of stolen property, funeral expenses, lost wages, and medical bills, is not allowed.

h. Most Medical Costs: VOCA funds cannot pay for non-emergency nursing home care, home health care costs, dental care, hospital care, and other medical costs resulting from a victimization, except for forensic medical examinations for sexual assault victims.

i. Relocation Expenses: VOCA funds cannot support relocation expenses for crime victims, such as moving expenses, security deposits for housing, ongoing rent, and mortgage payments. However, VOCA funds may be used to support staff time in locating resources to assist victims with these expenses.

j. Administrative Staff Expenses: Salaries, fees, and reimbursable expenses associated with administrators, board members, directors, consultants, coordinators, and other individuals are not supported by VOCA funds unless these expenses are incurred while providing direct services to crime victims.

k. Development of Protocols, Interagency Agreements, and Other Working Agreements: Though these activities benefit crime victims, they are considered examples of the types of activities that grant recipients should undertake as part of their role as victim services organizations, which in turn qualifies them as VOCA subrecipients.

l. Costs of Sending Individual Crime Victims to Conferences.

m. Activities Exclusively Related to Crime Prevention.

F. Financial Requirements

1. Office of Justice Programs Financial Guide.

All organizations that receive VOCA victim assistance funds must adhere to the financial and administrative provisions set forth in the OJP *Financial Guide* as implemented by the State Administrative Agencies. Please contact your VOCA State Administrator to obtain a copy of the OJP *Financial Guide*. The current edition also is available via OJP's Web site at <http://www.ojp.usdoj.gov/FinGuide/>.

2. On-Site Monitoring Plan.

Various Federal Government agencies and most VOCA State Administrators have implemented on-site monitoring plans in which VOCA subgrant recipients are visited periodically by staff from these agencies. Under the monitoring plan, staff may visit grant recipients and review documents such as (1) financial records and audit reports; (2) policies and procedures governing organization and VOCA funds; (3) programmatic records of victim services; and (4) timekeeping records and other supporting documentation for costs supported by VOCA grants.

G. Reporting Requirements

1. Bookkeeping.

VOCA grant recipients are required to maintain appropriate programmatic and financial records that clearly and fully disclose the amount and disposition of VOCA funds and the appropriate project match. This means that a designated person within the grant recipient organization must be a knowledgeable and experienced bookkeeper or accountant. With the guidance provided by VOCA State Administrators, there is usually no great difficulty in complying with VOCA's basic reporting requirements. VOCA State Administrators usually require grant recipients to submit monthly or quarterly financial and performance reports.

2. Financial Reports.

Financial reports are submitted on a form or in a format designated by the VOCA State Administrator that accurately describes how VOCA funds and project match have been used during the reporting period. A final report must be submitted at the end of the grant period so that the grant can be closed-out.

3. Performance Reports.

Performance reports are submitted to VOCA State Administrators quarterly, semi-annually, or annually on a form or in a format prescribed by the

Administrator. Programs receiving VOCA funds are asked to provide the following information in their performance reports:

- Type of agency receiving funds.
- The number and type of victims served.
- Description of VOCA-funded staff's duties.
- Description of efforts to coordinate services.
- Description of efforts to help victims apply for crime victim compensation benefits.
- Program evaluation results, case histories, victim satisfaction surveys, and anecdotal information.

SECTION V:

BIBLIOGRAPHY AND SOURCES

Bibliography

Discover Total Resources, Mellon Bank Corporation, 1985, p. 43. (Free copies of this publication can be obtained from Mellon Bank Corporation, One Mellon Bank Center, Pittsburgh, PA 15258. 412-234-6266.)

Gross, Marvin V. and William Warsharver. *Financial and Accounting Guide for Nonprofit Organizations*. New York: Ronald Press Publications, 1983 Revised Third Edition, p. 564.

Rosso, Harry A. and Associates. *Achieving Excellence in Fund Raising*. San Francisco: Jossey-Bass Publishers, 1991, p. 319.

Reading Sources

Covey, Stephen R. *First Things First: A Principle-Centered Approach to Time and Life Management*. New York: Simon & Schuster, 1994.

Covey, Stephen R. *The 7 Habits of Highly Effective People: Restoring the Character Ethic*. New York: Simon & Schuster, 1989.

Federal Register, published daily, Monday through Friday, by the Office of the Federal Register, National Archives and Records Service, General Services Administration, Washington, DC 20408.

Flanagan, Joan. *The Grass Roots Fund-raising Book*. Chicago: Contemporary Books, Inc.

Foundation Grants Index Bimonthly, The Foundation Center, 79 Fifth Avenue, Box CE, New York, NY 10003.

Other Sources

Council for Advancement and Support of Education (CASE), 11 Dupont Circle, Washington, DC 20036.

Foundation for Center Cooperating Collection in your area. Contact the Foundation Center, 79 Fifth Avenue, New York, NY 10106.

National Executive Service Corps, 120 Wall Street, New York, NY 10005.

Working Assets Money Fund, 230 California Street, San Francisco, CA 94111.

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OVC

Subgrantees' Training Guide Victims of Crime Act Victim Assistance Grant Program

For copies of this guide and/or additional information, please contact:

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Refer to publication number: **NCJ 175717**