

STOP ALLOWABLE & UNALLOWABLE COSTS

Funded through the U.S. Department of Justice Office on Violence Against Women, the STOP (Services, Training, Officers, and Prosecutors) Violence Against Women Formula Grants are awarded to states to develop and strengthen the criminal justice system's response to violence against women including the crimes of sexual assault, domestic violence, stalking, and dating violence and to support and enhance services for victims.

While victim services should focus on projects and services that primarily serve adult women and girls from age 11 through adulthood, victims of any gender may be served. Funds may also be used to support secondary victims such as children who may have witnessed violence; men, women and children who currently or have been victims of sexual violence who are now in correctional and detention settings; and individuals who have historically been marginalized from mainstream services such as those within the LGBTQI community.

ALLOWABLE COSTS & ACTIVITIES:

DIRECT SERVICES

- 1. Emergency food, shelter, and transportation within the context of victim services enhancing safety of the victim and her/his dependents, including reasonable costs for out of state travel.
- 2. Crisis intervention, short-term individual and group support services, and comprehensive service coordination and supervision to assist victims and family or household members.
- 3. 24-hour hotline services providing crisis intervention services and referral for victims.
- 4. Services for child sexual assault survivors (ages 11 and above only).
- 5. Services for adults who survived child sexual abuse. Stop funds may be used to address child sexual abuse when the victim is now an adult, if the abuse occurred or continued when the victim was aged 11 or older.
- 6. Payment for substance abuse counseling for domestic abuse or sexual assault victims
 - Services must be provided by a counselor whose approved scope of work specifically addresses substance abuse issues for victims of DV/SA.
- 7. Accompaniment and advocacy for victims through medical, civil or criminal justice, immigration, and social support systems.
 - o Including medical facilities, police, and court proceedings
 - May include legal advocacy but no legal advice or representation



- 8. Legal services including but not limited to:
 - o Family law
 - Housing
 - Public benefits
 - Other similar civil matters

ACTIVITIES SUPPORTING DIRECT SERVICES

- **9.** Service Coordination and Training necessary for a coordinated community response to survivors of domestic violence, dating violence, sexual assault and/or stalking.
- 10. Information and referrals to assist the victim and non-offending family or household members.
- **11. Outreach services** informing victims and/or potential victims about available services.
 - Efforts must be population specific and informed by members of the population to be served.

12. Prevention education.

- Strategies, programming, and activities to stop first-time perpetration and first time victimization.
- 13. Community-based, linguistically, and culturally specific services and support mechanisms.
 - Including outreach activities for underserved communities.
- **14.** Publications, including but not limited to:
 - Training materials
 - Victim service directories
 - o Brochures

15. Program evaluation.

DETAILS ON ALLOWABLE COSTS

SERVICE PROVISION:

- 1. Services offered should address victims of domestic violence, dating violence, adult and child sexual assault (if the child survivor is 11 years of age or older), or stalking. Victims of any gender, gender identity, or sexual orientation may be served.
- Services rendered to children do not have to relate to serving an adult parent, if the child is 11-years of age or older. Funds may also be used to provide services to children who have not been assaulted but whose parent is a victim of any of the above listed categories of violence. For example, children who witness violence.



- 3. Services may be provided to victims of the above listed categories of violence within a detention setting (prison, jail, etc.)
- 4. A subgrantee may provide women's only and men's only support groups, but only if it is necessary to the essential operation of the program that these support groups be segregated by sex. If a recipient can establish that sex-specific support groups are necessary to the essential operation of the program, "comparable services" are required to be provided to victims who cannot be served by the sex-specific support groups.

COVERING COSTS FOR VICTIMS:

- Costs associated with the payment of a victim's first month's rent are allowable and preferred over paying a deposit. However, the payment of a deposit is also allowable if an agreement between the funded agency and the landlord identifies the funded program to be reimbursed the deposit at the end of the lease.
- 2. Gift cards are allowable but are limited to allowable costs under STOP, such as the purchase of gas or child care so that the victim can participate in a focus group. Agencies must acquire receipts from the victim documenting that the gift card was only used for the purchase of allowable items. Without receipts, these costs will be deemed unallowable and repayment of these funds will be required.
- 3. It is allowable to provide a stipend to reimburse participants for their costs in attending a focus group, such as gas or childcare. This can be done through actual reimbursement or through a generic gift card in an amount intended to compensate for such costs. Focus groups must be part of the implementation of one of the STOP Program purpose areas, for example a focus group as part of the development of local "policies that enhance best practices for responding to domestic violence, dating violence, sexual assault, and stalking."

DETAILS ON TRAINING:

- 1. Costs associated with the training of officers, court personnel, judges, prosecutors, and victim service advocates who provide specific grant-funded services are allowable. Funds may not be used to provide a generalized statewide training.
- 2. STOP funds may be used to purchase food in some instances. The provision of food and beverages at training events or conferences is governed by the most recent version of the DOJ Financial Guide.

DETAILS ON ADMINISTRATIVE ALLOWABLE COSTS:

 When a grantee receives multiple funding streams, the rent and operational expenses of the agency must be prorated among the different funding sources. In addition, the rent must be reasonable. If the shelter owns its own facility, only related expenses such as utilities and building security may be charged to the grant.



- 2. STOP funds may be used to purchase supplies and equipment necessary to support the program goals. "Equipment" consists of property having a useful life of more than one year and a per unit acquisition cost of \$5,000. "Supplies" are all tangible property less than \$5,000 per unit that will be expended during the project period.
- 3. If a subgrantee has a federally approved indirect cost rate, the state must honor it. If there is no federally approved indirect cost rate, the state must recognize a rate negotiated between the state and the subgrantee (in accordance with 2 CFR 200) or a "de minimus indirect cost rate" of 10% of Modified Total Direct Costs as defined in 2 CFR§200.414.

UNALLOWABLE COSTS & ACTIVITIES:

- **1.** Lobbying e.g. ANDVSA membership dues.
- 2. Research projects.
- 3. Physical modifications to buildings, including minor renovations.
- 4. Vehicle purchases.
- 5. Legal services to defend women who assault, kill, or otherwise injure their abusers.
- 6. Moving expenses (outside of transportation costs to enhance safety as outlined above).
- 7. Vouchers for services such as for housing or counseling.
- 8. Payment of immigration fees for battered immigrant women.

ACTIVITIES THAT COMPROMISE VICTIM SAFETY AND RECOVERY AND UNDERMINE OFFENDER ACCOUNTABILITY

The Office on Violence Against Women does not fund activities that jeopardize victim safety, deter or prevent physical or emotional healing for victims, or allow offenders to escape responsibility for their actions. STOP projects that engage in activities that compromise victim safety and recovery may be eliminated from further funding consideration. Examples of these activities include but are not limited to:

- 1. Procedures or policies that exclude victims from receiving safe shelter, advocacy services, counseling, and other assistance based on their actual or perceived age, immigration status, race, religion, sexual orientation, gender identity, mental health condition, physical health condition, criminal record, work in the sex industry, income or lack of income, or the age and/or gender of their children.
- 2. Procedures or policies that compromise the confidentiality of information and/or privacy of persons receiving services.



- 3. Procedures or policies that fail to include conducting safety planning with victims.
- 4. Project designs, products, services, and/or budgets that fail to account for the unique needs of individuals with disabilities, with limited English proficiency, or who are deaf or hard of hearing, including accessibility for such individuals.
- 5. The use of pre-trial diversion programs in cases of domestic violence, dating violence, sexual assault, or stalking or the automatic placement of offenders in such programs.
- 6. Couples counseling, family counseling, or any other joint victim-offender counseling as a routine or required response to sexual assault, domestic violence, dating violence, or stalking, or in situations in which child sexual abuse is alleged.
- 7. Mediation in cases of domestic violence, dating violence, sexual assault, or stalking, except where the mediation is voluntary for the victim and there is screening for such victimization prior to the start of mediation, there is informed consent on the part of the victim, the mediators have appropriate training on such victimization issues, and the process includes ongoing safety planning for victims and flexibilities such as having the victim and offender physically separated.