# Response to Questions Submitted After the VOCA and ML Updates Session

Questions from the VOCA and ML Updates Session on 03/05/2025 11:00 AM to 12:00 PM.

#### **Question 1 – Funding**

**Question 1A:** A participant asked what the VOCA funding amount will be for the next fiscal year and how it compares to the current fiscal year's funding.

**GMU Response:** The VOCA award amount for SFY 26 is \$12,900,983, but GMU will only be awarding \$10.5 million to help mitigate potential funding reductions in future years.

The current fiscal year's awarded amount was \$13 million.

**Question 1B:** A participant asked whether the funding strategy will involve cutting everyone's awards proportionally or consolidating funding to fewer agencies.

**GMU Response:** The current strategy is to maintain the same level of funding across agencies. GMU is not prioritizing funding for new agencies or major program changes due to the decreasing availability of funds.

**Question 1C:** A participant asked if there could be a larger conversation about efficiency in funding between VOCA and Marriage License funds, particularly regarding requirements such as 24-hour hotlines.

**GMU Response:** GMU is open to having a discussion in the fall about potential efficiency strategies. A statewide meeting with agency leaders will be planned to discuss service delivery strategies and funding sustainability.

**Question 1D:** A participant asked whether agencies should expect further reductions in funding and how they should budget accordingly.

**GMU Response:** The future of victim services funding remains uncertain, and GMU cannot predict exact changes. The current strategy is to hold back a portion of funds to help offset anticipated reductions in upcoming years.

**Question 1E:** A participant asked about the importance of having ongoing discussions among service providers about program effectiveness, training, and service delivery beyond funding-related conversations.

**GMU Response:** GMU supports the idea of creating more opportunities for agencies to collaborate on service delivery improvements. Future meetings will be planned to facilitate these discussions.

#### **Question 2 – DE&I Initiatives Under the Current Climate**

**Question 2A:** A participant asked whether culturally specific programs would continue receiving support given the current reductions and the impact on DEI initiatives under the administration.

**GMU Response:** There is currently no federal guidance on this issue, and technical assistance providers also do not have an answer. Some states are recognizing diversity-related services under the category of "underserved populations," but there is no official directive on this. The current funding is issued under an existing program instruction, and GMU will continue operations as usual unless new guidance is provided. GMU does not have information on future cultural sensitivity requirements or how executive orders may impact VOCA funding in this area.

#### **Question 3 – NOFO, Funding Amounts, NOFO Announcement Timeline**

**Question 3A:** A participant asked when the VOCA NOFO will be posted and what the turnaround time for agencies to submit applications will be.

**GMU Response:** The VOCA NOFO has been posted on March 14, 2025. GMU aims to provide a 30-day turnaround time for VOCA applications. VOCA Applications are due Tuesday, April 15, 2025, at 5 PM PST.

Question 3B: A participant asked whether there will be funding for FVPSA next year.

**GMU Response:** No ARPA funding will be available. FVPSA funding has not been cut, and GMU has not received any indication that it will be. While all grant programs face potential funding risks, current funding for FVPSA is still available. If there are any changes, GMU will notify agencies as soon as possible.

**Question 3C:** A participant asked whether there are drastic changes to eligibility or funding requirements in the updated VOCA NOFO.

**GMU Response:** There are no major changes to eligibility or funding requirements. The primary changes involve the removal of any elements not explicitly supported by NRS or CFR. GMU leadership has undergone extensive training and review of NRS and CFR requirements to ensure that policies align with legal mandates. Some programming items have been removed, and unnecessary elements have been cut to streamline the application process.

**Question 3D:** A participant asked about the sequencing of funding announcements for Marriage License, VOCA, and FVPSA awards, stating that it is difficult for agencies to accurately complete their applications without knowing their award amounts from other funding sources. They asked whether GMU would ensure that one funding source is announced before the other to aid in application planning.

**GMU Response:** GMU understands the challenge of submitting an application without knowing what the other funding sources award amounts will be. Historically, VOCA has been announced before Marriage License or FVPSA, but this year's timeline is slightly different. GMU aims to provide Marriage License award amounts as soon as possible to help agencies prepare accurate applications. While the timeline may shift, agencies should expect Marriage License awards before the VOCA deadline so they can better align their applications. GMU has simplified processes to expedite funding announcements, and updates will be provided to agencies as soon as award amounts are determined.

**Question 3E:** Some agencies asked for clarification on the VOCA NOFO posting date and whether there will be a 30-day period between the announcement and the submission deadline.

**GMU Response:** VOCA will have a 30-day submission window from the date it is posted, applications are due by April 15. Marriage License applications are due by April 1, as required by statute, and do not follow the same 30-day application submission rule. GMU has released the VOCA NOFO as of March 14, 2025, to allow sufficient time for agencies to prepare their applications. GMU acknowledges that funding amounts for VOCA are decreasing and is committed to maintaining clear communication with agencies throughout the process. GMU shared federal legislative updates in the chat regarding potential funding opportunities that agencies may wish to monitor.

#### **Question 4 – General Questions**

**Question 4A:** For ML: An individual asked whether agencies must have every racial and ethnic group in their county represented on their board, even if a certain group makes up only a very small percentage of the population.

**GMU Response:** Ethnicity is defined by the U.S. Census as Hispanic or Latino, meaning this is the only ethnic categorization considered. Race is defined separately based on U.S. Census Bureau classifications. The Census Bureau provides dashboards showing demographic makeup that agencies can reference for compliance. More information regarding the Census Bureau definitions is found on Page 13 of this document.

Use the "Search" bar on the top left to search for your county, the dashboard links below has been preconfigured for the state of Nevada and with the characteristic specifics.

US Census Bureau Racial and Ethnic Dashboard: <u>DP05: ACS Demographic - Census Bureau Table</u> US Census Bureau Social Characteristics Dashboard: <u>DP02: Social - Census Bureau Table</u> US Census Bureau Economic Characteristics Dashboard: <u>DP03: Economic - Census Bureau Table</u>

To assist in our review, **please submit your organizational chart to GMU, detailing the racial, ethnic, social, and economic composition of your board.** GMU will review the information and provide feedback accordingly.

**Question 4B:** For ML: Another representative asked how to quantify board composition in relation to the county's racial, ethnic, economic, and social makeup, particularly in cases where a board has a limited number of members and ensuring an exact match may not be feasible.

**GMU Response:** After submitting your application with the organizational chart, with board members included, detailing the **racial**, **ethnic**, **social**, **and economic composition of your board**. GMU will analyze the information and offer guidance based on the data provided.

**Question 4C:** An individual requested confirmation that the current Marriage License NOFO funding distribution structure aligns with the previously agreed-upon scoring matrix from last year.

**GMU Response:** GMU confirms that the previously agreed upon weight-scoring matrix for service numbers, from SFY 2025, is the method that GMU will use to determine the funding allocation between two applicants in counties whose population is over 100,000.

#### **Question 5 – 15% Non-Governmental Funding Requirement for Marriage License**

**Question 5A:** An individual asked for clarification on how GMU is calculating funding sources, specifically in relation to government funding, private contributions, and investment income.

**GMU Response:** NRS <u>217.420 (3)</u> states that organizations applying for this funding must: "Receive at least 15 percent of its money from sources other than the Federal Government, the State, any local government or other public body or their instrumentalities. Any goods or services which are contributed to the organization may be assigned their reasonable monetary value for the purpose of complying with the requirement of this subsection." To verify if an applicant meets this requirement, GMU is requiring all applicants to submit a copy of their most recent IRS From 990 (Return of Organization Exempt from Income Tax).

**Question 5B:** An individual asked what the term "instrumentalities" means in the context of NRS 217.420 (3) and how it affects funding eligibility.

**GMU Response:** The IRS (Internal Revenue Service) describes instrumentalities as entities created or controlled by federal, state, or local governments. This includes special districts, public governing bodies, or public agencies. An agency who receives any form of funding from any form of governmental entity will fall under the instrumentalities definition and will be included in the final calculation. IRS Instrumentalities Definition: <u>https://www.irs.gov/pub/irs-tege/eotopice90.pdf</u>

**Question 5C:** An individual asked whether receiving income from investments counts toward the 15% nongovernmental funding requirement.

GMU Response: GMU will quantify this requirement on the IRS Form 990.

## Response to Questions Submitted After the Aid for Victims of Domestic Violence and Sexual Violence, Marriage License Policy and NOFO Review Session and before the VOCA and ML Updates Session

As of 03/05/2025 9:00 AM

#### **Question 1 - ML Policy 2026**

**Question 1A:** On page 3 of 13 – Under 'Purpose' – There is no mention of 'public agencies' in the NRS. Why was this added to the purpose statement? In fact, under your own eligibility section you have that it is just for 'nonprofit corporations'.

**GMU Response:** GMU has re-evaluated the wording and confirms that non-profit agencies are the only eligible entities for this funding. This was a previously stated definition provided to the GMU. GMU has now clarified the langue of the purpose statement to remove "public agencies" and clarify this is for non-profit agencies.

**Question 1B:** On page 3 of 13 – Under 'Purpose' – Why have you decided that ML funding is 'exclusively for shelter and shelter-related services? I have concerns with the use of the word 'exclusively'. My reading of NRS 217.420 is very different. Under section 7.a. I believe that the intent of the wording is simply that a nonprofit be able to provide shelter to victims on any day, at any hour, except in counties under 100,000 population or if they provide services exclusively to victims of sexual violence.

**GMU Response:** GMU has changed the purpose statement to better reflect the requirements in the NRS. GMU has refined the statement to better align with NRS 217.420(7)(a)-(f). The new purpose statement now reads: "Funding is **for activities and services as defined in** NRS 217.420(7)(a)-(f).

**Question 1C;** On page 3 of 13 – Under 'Purpose' – Again, section 7 of NRS 217.420 includes many services. Shelter is the first, but 7.b-f include all the other important services that you many want to include in the purpose statement.

**GMU Response:** GMU has reviewed historical definitions of the NRS and funding precedence. GMU will continue to intend to fund for those services related to the ones as listed in NRS 217.420 (7) (a) – (f).

#### Question 2 – ML NOFO

**Question 2A:** Regarding the quarterly reports, in the past we have reported on 100% of our service numbers, but you are now asking that our quarterly reports reflect only data for ML funding. One of the challenges with this is that we use ML funding for administrative staff, so how does this relate to service numbers? In addition, this will impact our application and how we identify goals, projected services, etc. DCFS agreed that all services could be reported because all agencies applying for ML already have a mission to provide services to domestic violence (and SA) survivors and their children.

**GMU Response:** The service numbers will now be reported on a year-to-date basis. Year-to-date reports will now ask for funded agencies to provide total number of individuals and services provided across ML, VOCA, FVPSA, and VAWA funding sources and to provide total number of services provided specifically for Marriage License. GMU will provide reporting training and continuing discussion to ensure fair data collection and reporting.

**Question 2B:** Programming scoring factors "shelter confidentiality" NRS 217.420 (5) Require its employees and volunteer assistants to maintain the confidentiality of any information which would identify persons receiving the services. This does not specifically state that the shelter must be confidential.

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Question 2C:** Client feedback is 10 pts. for client survey results. Do we submit surveys with our SFY26 ML application? If so, do you want the actual surveys or data compiled from surveys?

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Question 2D:** Shelter and housing services data 10 pts. Service Number Scoring Factor. Emergency Bed Nights and Bed Nights, we've never reported on these separately or been asked to report the difference between emergency bed nights or regular bed nights. We'd need more guidance around this distinction.

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Question 2E:** Need more guidance on "national shelter standards," what impact does this have on the scoring process for SFY26?

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Question 2F:** How does DCFS define shelter capacity? The number of beds being used or the number of beds available? How will DCFS monitor this? Does this include motel?

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Question 2G:** This question is based on whether ML funds according to the NRS are exclusively for shelter. If we agree that ML doesn't only fund shelter, why is DCFS breaking out the budget based on shelter related expenses and operational? Are more points awarded to shelter related expenses?

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Question 2H:** Is there a specific form or language we need to add to policies/procedures now that DCFS is in charge of the grievance process?

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

#### **Question 3 – Weight Scoring Matrix**

**Question 3A:** In a county like Washoe, which currently has just 2 organizations that receive ML funding, there may be some considerations to take into account when it comes to the scoring. If we are solely DV, but the other organization is both DV/SA how would that look when comparing our service numbers?

**GMU Response:** GMU will utilize the data provided on the year-to-date reports. The data provided to GMU will contain the total number of individuals serviced and the total number of services provided. There will be two separate forms used for reporting, one is for Victims of Domestic Violence and the other is for Victims of Sexual Violences. Funded organizations who are funded for both DV and SV are to only report the respective amounts for each funding type. Serviced Numbers for DV is different than the one for SV. GMU will verify these numbers through our monitoring efforts.

**Question 3B:** Additionally, if in year one we receive 50% of the DV funding for Washoe, but this is roughly 25% of our total funding sources, we would potentially be reporting 25% of our total service numbers. Alternatively, the other organization's ML funding amount might be 50% of their total DV budget and therefore they would be reporting on 50% of their service number totals. When it comes time to determine funding for year two, the data sets won't really be comparable because they will be based on the previous year's funding amounts.

**GMU Response:** The SFY 2025 year-to-date reporting is divided into two. One solely to report for Victims of Domestic Violence. One solely to report for Victims of Sexual Violence. Duplication between the two are prohibited and GMU will verify numbers through our monitoring efforts.

#### **Question 4 – General Questions**

**Question 4A: Client Feedback Scoring**: Would it be possible to adjust the required data collection timeframe from **July 1, 2024 – March 30, 2025, to July 1, 2024 – February 28, 2025**? Given that the grant is due April 1, this adjustment would allow applicants to finalize their proposals earlier while still providing meaningful data. (page 11)

**GMU Response:** The Client Satisfaction Surveys will no longer be a component of the final Aid to Victims of Domestic Violence or Sexual Violence funding.

Question 4B: Shelter Housing Service Data (Bed nights): Like client feedback data, the required shelter housing service data (bed nights) extends through March 30, 2025, with the grant due on April 1. Would it be possible to adjust this timeframe to February 28, 2025, to allow applicants to submit their grants earlier and ensure accurate data without last-minute submission challenges?

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Question 4C: Budget Component**: In the future, could the **budget component** be included directly in the NOFO documents rather than requiring applicants to download it separately from the website? Having it within the NOFO would streamline access and reduce potential confusion, particularly for smaller agencies with limited resources.

**GMU Response:** Due to limitations with Microsoft Word, the implementation of a Microsoft Excel sheet directly into Microsoft Word could cause issues. The Budget Narrative is a separate file in a separate program due to formulations embedded within. GMU will take this recommendation under advisement and seek clarification from the software maker on how we can implement the Budget Narrative within Microsoft Word.

**Question 4D: Shelter Standards**: The NOFO requests that applicants cite sources for where their **shelter standards** were adapted. To our knowledge, there are no formal **certifications** for domestic violence shelter standards, only general best or promising practices. Could you clarify what is expected regarding citing sources or give examples of where shelter standards can be reviewed and adapted? Would referencing HUD, FVPSA, or other industry best practices be sufficient?

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Question 4E: Increased Complexity of NOFO Instructions**: This year's NOFO instructions have increased from **22 pages to 105 pages**, which provides helpful detail but also makes the application process significantly more complex. This presents challenges for smaller agencies that do not have dedicated grant-writing staff and operate with limited staff. Is there any consideration for **simplifying the process** for agencies not competing with other agencies in their county for ML funding?

**GMU Response:** The updated finalized NOFO, with the embedded application form, is now a total of 54 pages. As we streamline our processes, GMU will solicit feedback from our subgrantee community on how we can better align our processes and provide further support.

**Question 4F:** The ML NOFO awards higher points to agencies with "lower personnel costs." However, it does not appear to provide consideration for agencies that have successfully retained staff over time. Recruitment and training are significant expenses, and frequent staff turnover results in additional costs and lost expertise. Long-term employees bring institutional knowledge of both the agency and community resources, which enhances service delivery. Would the grant review process consider the value of staff retention and longevity when evaluating applications?

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Question 4G:** Agency wants to confirm whether our **Operation Policies and Procedures** document would meet the new **Standards** requirement. Our current document is 65 pages and includes comprehensive policies covering hiring, HR, fiscal procedures, crisis intervention, staff training, and shelter operations, among other areas. Would this document satisfy the requirement, or would you prefer a condensed version (approximately 20 pages) focusing specifically on **crisis intervention, staff training, and shelter operations**? Please let me know how you'd like me to proceed.

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

## Response to Questions Submitted During the Aid for Victims of Domestic Violence and Sexual Violence, Marriage License Policy and NOFO Review Session

Questions from the Policy and NOFO Review Session on 02/26/2025 11:00 AM to 1:00 PM.

#### **QUESTION 1 – Nonprofit vs. Public Agencies on the Purpose Statement**

**Question 1A:** A Washoe county agency asked if nonprofit agencies and public agencies are the same thing and whether nonprofit agencies are the only entities eligible for ML funding.

**GMU Response:** GMU has re-evaluated the wording and confirms that non-profit agencies are the only eligible entities for the Marriage License funding. GMU has now clarified the langue of the purpose statement to remove "public agencies" and clarify this is for non-profit agencies.

**Question 1B:** A Washoe County agency asked why public agencies were included in the purpose statement when the NRS only mentions nonprofit corporations and if this aligns with the NRS.

**GMU Response:** This was a previously stated definition provided to the GMU. GMU has now clarified the langue of the purpose statement to remove "public agencies" and clarify this is for non-profit agencies.

### QUESTION 2 – Purpose Statement and NRS Interpretation (NRS 217.420(7)(a)-(f))

**Question 2A:** A Washoe County agency asked why the purpose statement now states "exclusively for shelter and shelter-related services" when previous versions did not, and whether this emphasis on shelter is explicitly supported by the NRS.

**GMU Response:** GMU has changed the purpose statement to better reflect the requirements in the NRS. GMU has refined the statement to better align with NRS 217.420(7)(a)-(f). The new purpose statement now reads: "Funding is **for activities and services as defined in** NRS 217.420(7)(a)-(f).

**Question 2B:** A Washoe County agency asked if the term "exclusively" in NRS 217.420 refers only to agencies providing services exclusively to victims of sexual violence and not exclusively to providing shelter.

**GMU Response:** The term exclusively in NRS 217.420 (4) (a) refers to services to be provided exclusively to victims of domestic violence or sexual violence for counties with populations over 100,000. NRS 217.420 (4) (b) refers to services to be provided primarily for victims of domestic violence or sexual violence for counties with populations less than 100,000. The term exclusively in NRS 217.420 (7) (a) states that organizations have to provide a shelter. Exceptions are made to organizations that are in a county whose populations are less than 100,000 of if the organization provides services exclusively to victims of sexual violence.

**Question 2C:** A Washoe County agency asked whether limiting funding to exclusively providing shelter aligns with the intent of the original NRS wording.

**GMU Response:** GMU has updated the definition to better align with the NRS as it currently stands. The new definition now reads: "Funding is exclusively for activities and services that provide victims of domestic or sexual violence with access to: safe housing or shelter; emergency communication; counseling or referrals to counseling; legal, medical, or psychological assistance or vocational support; and educational programs related to domestic and sexual violence (NRS 217.420(7)(a)-(f)."

**Question 2D:** A Washoe County agency asked if the policy wording will be re-evaluated and clarified and if historical data will be reviewed to provide context and justification before finalizing the policy.

**GMU Response:** GMU has re-evaluated the wording on the purpose statement. GMU used historical data and historical revisions to the NRS. GMU specifically examined the changes made to the NRS (<u>1981, 380</u>; <u>1983, 909</u>; <u>1999, 118</u>; <u>2017, 1067</u>; <u>2021, 131</u>, <u>3255</u>) to create the new definition.

**Question 2E:** A Washoe County agency asked if the intent of NRS 217.420 includes funding for counseling, legal, medical, and psychological services for both shelter residents and community members, rather than limiting these services exclusively to shelter residents.

**GMU Response:** GMU has reviewed historical definitions of the NRS and funding precedence. GMU will continue to fund services related to the ones as listed in NRS 217.420 (7) (a) - (f).

**Question 2F:** A Clark County agency asked if the intent of the funding is to support all agency programs, including advocacy and non-shelter services, as historically funding was provided across programs as long as the agency had a shelter, rather than exclusively for shelter operations.

**GMU Response:** GMU recognizes that agencies historically received funding for other programs as long as they operated a shelter. GMU will continue to fund programs and services related to the ones listed in 217.420 (7) (a) – (f). GMU further clarifies that if an organization operates in a county whose population is less than 100,000 or if the organization provides services for sexual violence, then that organization does not need to be able to provide shelter.

### QUESTION 3 – Programmatic Scoring for Sexual Assault and Non-Shelter Services (NRS 217.420(7)(a)-(f))

**Question 3A:** An individual asked if there is a programmatic scoring section specifically for sexual assault services and why the current scoring focuses primarily on shelter.

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Question 3B:** An individual asked how services outside of shelter (e.g., community-based advocacy or non-residential services) will be weighted and evaluated in the scoring matrix.

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

#### **QUESTION 4 – Year-to-Date Reports and Service Numbers**

**Question 4A:** A Washoe County agency asked if quarterly performance reports will now be limited to services funded exclusively by Marriage License funding, noting that previously all services were reported regardless of funding source.

**GMU Response:** The service numbers will now be reported on a year-to-date basis. Year-to-date reports will now ask for funded agencies to provide total number of individuals and services provided across ML, VOCA, FVPSA, and VAWA funding sources and to provide total number of services provided specifically for Marriage License.

**Question 4B:** A Washoe County agency asked how to quantify administrative roles (e.g., development manager) supported by marriage license funding in quarterly reports, especially if those roles are not directly tied to service numbers.

**GMU Response:** GMU will provide reporting training and continuing discussion to ensure fair data collection and reporting.

**Question 4C:** A Washoe County agency expressed concern about the shift in reporting requirements and requested clarification on how to segment services specifically funded by marriage license funding, suggesting a need for guidance on aligning reporting with budget allocations.

**GMU Response:** GMU will provide reporting training and continuing discussion to ensure fair data collection and reporting.

**Question 4D:** A Washoe County agency asked how reporting service numbers based solely on marriage license funding (rather than all services) will impact scoring and funding levels, especially when comparing organizations that received different funding amounts in previous years. Individual expressed concern about potential inconsistencies in scoring and funding distribution, noting that this approach may not provide a fair comparison ("apples to apples") between agencies. Individuals suggested that this could limit opportunities for funding increases since reports would only reflect services provided through marriage license funding rather than total services offered.

**GMU Response:** The service numbers will now be reported on a year-to-date basis. Year-to-date reports will now ask for funded agencies to provide total number of individuals and services provided across ML, VOCA, FVPSA, and VAWA funding sources and to provide total number of services provided specifically for Marriage License. Respondents who reported higher overall numbers of individuals services from multiple funding sources, will also in effect report higher number of overall individuals services for Marriage License.

#### **QUESTION 5 – Demographic Information for Board Members (NRS 217.420 (2))**

**Question 5:** A Clark County agency asked for clarification on the specific demographic information required for board members as part of the application process.

**GMU Response:** As stated in NRS 217.420 (2): "Be governed by a board of trustees which reflects the racial, ethnic, economic and social composition of the county to be served and includes at least one trustee who has been a victim of domestic or sexual violence." GMU request that agencies provide us with the demographic makeup of their board. Once your application is submitted, GMU will analyze the information and provide feedback. GMU refers to guidance from the United States Census Bureau to define racial, ethnic, economic and social composition of the county as:

**Racial Composition: Definition:** The distribution of a population across various racial categories. (<u>https://www.census.gov/topics/population/race.html</u>)

U.S. Census Bureau collects racial data based on self-identification, recognizing categories such as:

- White
- Black or African American
- Asian
- American Indian or Alaska Native
- Native Hawaiian or Other Pacific Islander
- Two or More Races
- Middle Eastern or North African

**Ethnic Composition**: The proportion of the population identifying with specific ethnic origins, distinguished separately from race. (<u>https://www.census.gov/newsroom/blogs/random-samplings/2024/04/updates-race-ethnicity-standards.html</u>)

U.S. Census Bureau recognizes two primary ethnic categories:

- Hispanic or Latino Individuals with cultural ties to Spanish-speaking countries, including Mexico, Puerto Rico, Cuba, South or Central America, or other Spanish cultures, regardless of race.
- Not Hispanic or Latino Individuals who do not identify with Hispanic or Latino origins.

This definition recognizes that ethnicity is about cultural identity, not race.

**Economic Composition**: The economic status and income distribution within a population. (<u>https://www.census.gov/topics/income-poverty.html</u>)

The U.S. Census Bureau measures economic composition through:

- Income Levels Including median household income and income distribution.
- **Poverty Rates** Defined by comparing a family's total income to a set of thresholds varying by family size and composition.
- Employment Status Employment, unemployment, and labor force participation rates.

**Social Composition**: The social characteristics of a population, including demographic and cultural factors. (<u>https://www.census.gov/programs-surveys/acs/</u>)

The U.S. Census Bureau collects social data through the American Community Survey, covering:

- Education Levels Educational attainment and school enrollment.
- Family Structures Household composition, marital status, and family size.
- Language Proficiency Languages spoken at home and English proficiency.
- Citizenship and Nativity Citizenship status and place of birth.
- Housing Stability Homeownership rates and housing costs.

#### QUESTION 6 – Satisfaction Surveys and iMPRoVE System (NRS 217.460)

**Question 6A:** A Clark County agency asked if there are specific metrics or requirements for the number of satisfaction surveys needed, such as metrics based on funding amount, shelter size, or other criteria.

**GMU Response:** The Client Satisfaction Surveys will no longer be a component of the final Aid to Victims of Domestic Violence or Sexual Violence funding.

**Question 6B:** A Clark County agency asked if these metrics are still being developed and whether they will be shared once finalized.

**GMU Response:** The Client Satisfaction Surveys will no longer be a component of the final Aid to Victims of Domestic Violence or Sexual Violence funding.

**Question 6C:** A Clark County agency asked how to account for challenges in collecting surveys, such as clients leaving shelters unexpectedly, and how this might impact survey completion rates.

**GMU Response:** The Client Satisfaction Surveys will no longer be a component of the final Aid to Victims of Domestic Violence or Sexual Violence funding.

**Question 6D:** A Clark County agency asked for confirmation about the use of the iMPRoVE system for surveys and if there will be a discussion or training about using this system.

**GMU Response:** The Client Satisfaction Surveys will no longer be a component of the final Aid to Victims of Domestic Violence or Sexual Violence funding.

**Question 6E:** A Clark County agency asked for clarification on the history and reimplementation of the survey system, noting that it was previously offered but not implemented consistently.

**GMU Response:** The Client Satisfaction Surveys will no longer be a component of the final Aid to Victims of Domestic Violence or Sexual Violence funding.

**Question 6F:** A Clark County agency asked if satisfaction surveys are part of the scoring process and whether surveys need to be submitted with the application as indicated in the NOFO.

**GMU Response:** The Client Satisfaction Surveys will no longer be a component of the final Aid to Victims of Domestic Violence or Sexual Violence funding.

### QUESTION 7 – Weight Scoring Matrix for DV and SA Services (NRS- 217.420(7)(A))

**Question 7A:** A Washoe County agency asked how the Weight Scoring Matrix system will be used to manage separate funding buckets for domestic violence (DV) and sexual assault (SA) services, particularly for agencies that provide both types of services (DVSA) versus those that provide only one.

**GMU Response:** GMU will utilize the data provided on the year-to-date reports. The data provided to GMU will contain the total number of individuals serviced and the total number of services provided. There will be two separate forms used for reporting, one is for Victims of Domestic Violence and the other is for Victims of Sexual Violences. Funded organizations who are funded for both DV and SV are to only report the respective amounts for each funding type. Serviced Numbers for DV is different than the one for SV.

**Question 7B:** A Washoe County agency asked if shelter beds will be divided and reported separately for domestic violence and sexual assault clients in the Weight Scoring Matrix system.

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

## Response to Follow Up Questions Submitted Regarding the Aid for Victims of Domestic Violence and Sexual Violence, Marriage License Funding Opportunity

As of 02/22/2025 at 1:00 PM

#### **QUESTION 1 – Service Number Scoring Factors on the Weight Scoring Matrix**

**Question 1**: "60% of the score is set-up on program numbers, but when (agency) read the definition that is connected to the number of clients not the service numbers."

**GMU Initial Response:** GMU's goal in creating the weight scoring matrix is to maintain a fair and transparent scoring model that acknowledges both the breadth of clients served and the services provided. Historically, the GMU relied exclusively on service numbers to guide funding allocations. This year, we have refined our approach so that service numbers make up 60% of the final score, with the remaining 40% allocated to programmatic factors.

**GMU Updated Response:** The Programmatic Scoring Factor provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity. Service Number Scoring will be the only method of allocating funds to two applicants in a county whose population is over 100,000. This method was previously agreed to in SFY 2025 by all organizations in a county whose populations are over 100,000.

**Follow up to Question 1:** Service Number Scoring Factors In your response, you mentioned that "...service numbers make up 60% of the final score..." whereas the GMU document states that "Service Number Scoring is based on the total number of individuals served." Would you be able to clarify this distinction?

**GMU Initial Response:** After reviewing this questions GMU recognizes that the instructions provided under this section were not clear enough to explain that both components will be considered in scoring matrix. GMU has modified the definition to clarify. The new definition reads: "Service numbers represent the total number of victims served and the number of services provided to victims within six specific categories. These numbers are reported by each agency in their quarterly reports. Data from the first three quarters of the previous fiscal year, as recorded in HAL, will be used to calculate service numbers for this section (e.g., shelter bed nights, referrals, presentations, etc.)."

"This as (agency) explained 4 years ago to DCFS is inappropriate for the following reasons: (Questions 1A, 1B, 1C, and 1D)."

**Question 1A:** "It is not trauma-informed: an agency is rewarded for removing a client from shelter and servicing a new client vs. housing a client for the appropriate amount of time, also having length of stay maximums which are proven to not be trauma-informed."

**GMU Initial Response:** GMU recognizes the importance of trauma-informed care and understand that length of stay can be integral to recovery. Currently, length of stay is not a specific scoring factor in our weight scoring matrix.

**GMU Updated Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Follow up to Question 1A:** Length of Stay We understand that length of stay is not a specific factor in the scoring matrix; however, since service numbers account for 60% of the score and bed nights are considered a service number, could you kindly clarify how this factor is incorporated into the scoring?

**GMU Initial Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Question 1B:** "It does not provide the best service delivery for marginalized populations: Agencies are rewarded for eliminating not expanding their service offering because the revolving door of individual clients is the metric not how robustly an agency serves that client. And when (agency) look at our data the clients that need the most robust service offerings are the clients form marginalized populations. (Agency) strongly recommend we reconsider the clients served vs. services provided element of this process."

**GMU Initial Response:** GMU shares the agencies commitment to serving marginalized populations effectively and recognize that robust services are critical to achieving equitable outcomes. Our weight scoring matrix accounts for both clients served, and the range of services provided, as reflected in the Service Numbers Scoring Factor.

**GMU Updated Response:** GMU now measures using the Service Numbers Scoring Factor. The Service Number Scoring factor utilized the year-to-date report which provides information on the total number of individuals serviced and the number of services rendered.

**Follow up to Question 1B:** Marginalized Populations, could you please confirm whether the 60% award weight is based on the number of services provided or the number of clients served? Understanding this distinction would be very helpful.

**GMU Initial Response:** The Service Numbers Scoring Factor is based on both components: number clients served, and number of services rendered.

**Question 1C:** "Agencies that do not have sophisticated software can over count client's due duplication and a high level of anonymous clients."

**GMU Initial Response:** GMU appreciates the agencies concerns about data accuracy. As part of our monitoring system, we work closely with each agency to review their reporting systems and validate client data to ensure consistency. This approach helps us uphold accurate reporting and maintain fairness across agencies, regardless of technological resources

**Question 1D:** "Potential Solution – use the service number score and define the services. But discriminating against our marginalized populations should not be the outcome of a grant related metric."

**GMU Initial Response:** GMU takes very seriously the concern that any process might inadvertently overlook or disadvantage populations. Our current framework is guided by relevant NRS definitions (NRS 217.400), and our intention is to uphold equitable standards for all.

**Follow up to Question 1D**: Statutory References We noticed that NRS 217.400 does not appear to directly address this concern, nor does it seem to outline the additional factors referenced in the draft report. Could you provide further clarification on how these elements align?

**GMU Initial Response:** Statutory requirements are the definitions of what Victims of Domestic Violence or Sexual Violence. Those for this funding opportunity would be the targeted populations. NRS 217.400(1), (2), (3)(a)-(b)(1)-(5)(I)-(VI), (6)-(7), (4), (5), (6), (7)(a)-(e), (8), and (9).

# **QUESTION 2** – Budget Section on the Programmatic Scoring Factors of the Weight Scoring Matrix

**Question 2:** "Budget Efficiency: the calculation on this appears wrong and the goal to have low personnel costs also seems misguided:"

**Question 2A:** "Obviously, wages are higher in Las Vegas than some other areas of the state, this makes any kind of mass calculation worthless."

**GMU Initial Response:** GMU understands how cost-of-living differences can affect wages. For that reason, we compare each agency's personnel costs to similar agencies within the same geographic region, in this case by the county. While our weight scoring matrix includes a consideration for personnel costs, agencies with relatively higher personnel costs can balance those in the operating and services portions of the scoring. Our overall approach complies with the relevant NRS guidelines (NRS 217.440, subsection 2) to ensure cost-effectiveness.

#### From the Weight Scoring Matrix:

#### Personnel (Maximum 2 Points – Proportional Scoring)

#### **Operating (Maximum 4 Points – Proportional Scoring)**

#### Services (Maximum 4 Points – Proportional Scoring)

**GMU Updated Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Follow up to Question 2A:** Executive Staff Compensation We still have some concerns regarding this calculation. Larger organizations naturally have a greater need for executive staff, and in order to maintain a complex organization and retain talent, they often need to offer competitive wages. Even within the same county, an organization managing a \$1.5 million program operates on a different scale than one managing an \$8 million program, affecting compensation, services, and overall structure. Would it be possible to consider alternative metrics such as staff-to-revenue, staff-to-service, or staff-to-client ratios to create a more balanced comparison? As noted, there does not appear to be a requirement for this approach in NRS 217.440.

**GMU Initial Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Question 2B:** "(Agency) also do not think it is healthy to push agencies to pay a low wage, our front-line staff work incredibly hard why would we not want to pay a fair market wage plus when an agency has the fiscal health to do so."

**GMU Initial Response:** GMU agrees that front-line staff do vital work and deserve fair compensation. Our scoring approach does not dictate wages; instead, it aims to ensure that grant funds are managed efficiently and align with statutory requirements (NRS 217.440, subsection 2). GMU remains committed to supporting agencies in compensating their employees appropriately for their essential service.

**GMU Updated Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Follow up to Question 2B:** Wage Considerations, could you clarify whether the grant application evaluates only wages supported by the grant or all wages within an organization? It seems there may be an implication of dictating wage policies or incentivizing lower wages for staff, and we'd appreciate insight into the reasoning behind this approach. Additionally, could you provide the specific formula being used and how differences in agency size are taken into account? Again, we do not see a statutory requirement for this in NRS 217.440

**GMU Initial Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Question 2C:** "Potential Solution – use an employee efficiency ratio based on agency employees against service numbers (this is a normal metric in the for-profit world)."

**GMU Initial Response:** Pursuant to NRS 217.440(2), GMU's primary mandate is to achieve the lowest feasible cost while still providing a broad array of services. We recognize that staff productivity can also be

a relevant factor in cost-effectiveness and appreciate any perspectives on this topic. We remain committed to our current approach.

**GMU Updated Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Follow up to Question 2C:** Cost Considerations We could not find a mandate in NRS 217.440(2) that explicitly requires maintaining "the lowest feasible cost while providing a broad array of services." Could you please clarify where this requirement is derived from?

**GMU Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

# **QUESTION 3 – Client Feedback Section on the Programmatic Scoring Factors of the Weight Scoring Matrix**

**Question 3:** "Client Surveys. With no unifying metric (i.e. net promoter score or the like) how are you going to give one agency a score vs. another?"

**GMU Initial Response:** Rather than directly comparing agency surveys, GMU measures each agency's performance against its own results and improvement over time. Looking forward, we will be implementing iMPRoVE across all relevant victim services agencies, which will provide a more unified framework for evaluating client feedback consistently.

**GMU Updated Response:** The Client Satisfaction Surveys will no longer be a component of the final Aid to Victims of Domestic Violence or Sexual Violence funding.

**Follow up to Question 3:** iMPRoVE System We believe it would be beneficial to revisit the iMPRoVE system's implementation approach. When we attempted to use it in the past, we found that our clients viewed it as burdensome, which significantly reduced the number of surveys collected. We'd appreciate the opportunity to discuss potential refinements to make it more user-friendly.

**GMU Initial Response**: The Client Satisfaction Surveys will no longer be a component of the final Aid to Victims of Domestic Violence or Sexual Violence funding.

**Question 3A**: "Also, while (Agency) has been doing this for years, it seems a bit unfair to agencies that perhaps have not been doing this to spring it on folks at the last minute."

**GMU Initial Response**: GMU recognizes that agencies have different levels of experience with survey processes. At present, we believe each organization has at least some form of client feedback mechanism. As we move forward, we will provide notice and guidance to ensure everyone can transition smoothly into a unified survey approach with iMPRoVE.

**GMU Updated Response:** The Client Satisfaction Surveys will no longer be a component of the final Aid to Victims of Domestic Violence or Sexual Violence funding.

**Question 3B:** Potential Solution: maybe something to add for the 2026 cycle with a uniform survey and a bit more warning.

**GMU Initial Response:** Starting in the SFY 2026 performance period, all agencies will be required to utilize the iMPRoVE system to collect unified survey data that will be used for the Client Feedback section of the weight scoring matrix starting in the SFY 2027 performance period

**GMU Updated Response:** The Client Satisfaction Surveys will no longer be a component of the final Aid to Victims of Domestic Violence or Sexual Violence funding.

## **QUESTION 4 – Shelter Capacity Section on the Programmatic Scoring Factors of the Weight Scoring Matrix**

**Question 4:** "Shelter, one of the metrics is shelter beds, but if I have 100 beds and only 30 are occupied why does the number of beds matter? This should be changed to occupancy rate, or number of bed nights otherwise it is useless."

**GMU Initial Response:** GMU recognizes the importance of capturing meaningful data related to actual usage. Our current scoring incorporates the number of available beds as one factor to identify capacity.

**GMU Updated Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

**Follow up to Question 4:** Bed Capacity Metric We are seeking clarification on the methodology used for this metric. For instance, if an organization has 70 beds but chooses to fill only 35, how is credit determined? Additionally, what qualifies as a "bed"? Would this include items such as a pack-and-play, a cot, or a mattress on the floor? Understanding these distinctions would be helpful.

**GMU Initial Response:** This provision no longer applies to the final Aid to Victims of Domestic Violence or Sexual Violence funding opportunity.

#### **QUESTION 5 – Specific to Clark County Questions**

**Question 5A:** "Last year even through their 2023 990 show more than 85% of their funding came from government grants (a Clark County Agency) was funded through Marriage License. (Agency) would like to know how this metric is calculated as it is in statute, and it appears that quite a few agencies within the state may not make the threshold yet still receive funding."

**GMU Initial Response:** Beginning in SFY 2025, GMU has required all agencies to submit their IRS Form 990 (Return of Organization Exempt from Income Tax) to confirm compliance with the 15% non-governmental funding threshold. For agencies that did not initially meet this requirement, we offered technical assistance to help them move toward compliance.

**GMU Updated Response:** Interested organizations must now meet all eligibility criteria as outlined in NRS 217.420 (1)-(7). If an agency does not meet all of the eligibility criteria, the application will not move forward for consideration.

**Follow up to Question 5A:** Compliance and Technical Assistance Your response mentioned that technical assistance was offered to agencies that did not initially meet this requirement to help them move toward compliance. However, we did not find a provision in NRS 217.420 that allows for a grace period, as eligibility appears to be defined as a requirement. Could you clarify how technical assistance aligns with the statutory eligibility criteria

**GMU Initial Response:** Interested organizations must now meet all eligibility criteria as outlined in NRS 217.420 (1)-(7). If an agency does not meet all of the eligibility criteria, the application will not move forward for consideration.

**Question 5B:** "While the draft guidelines state that if no agency steps forward for a specific county you will check with adjacent counties, (Agency) would also like to help fill the gap if possible or at least put in a proposal for counties who are not covered by an agency, (agency has) been running a rural program from over 5 years in (rural frontier region) and have become quite adept at using the larger agency to support the rural component, and supporting the community and survivors as a result."

**GMU Initial Response**: GMU greatly values partnerships that expand coverage to underserved communities. For any county without an applicant, we do plan to reach out to existing funded agencies to explore their interest in serving those areas. We encourage all qualified agencies—such as yours—to participate in this process and help ensure that survivors in rural or unrepresented regions receive critical support.

**GMU Updated Response:** If no application is submitted for one of the counties, DCFS GMU will attempt to engage providers from nearby counties to determine if they are willing to extend their services to cover the unmet area. Organizations that express interest will be required to submit a new application specific to that county. Only funds allocated for that county will be awarded. If, after all reasonable outreach efforts are exhausted and no application is received, the funds will return to the DCFS account for redistribution among the awarded organizations.

**Question 5C:** "(Agency) have mentioned this every year to DCFS and splitting up the meeting regarding changes to Marriage License for rural counties and the two urban counties that have to "compete" seems like a worthwhile endeavor. It is also (agency) sincere hope given their grave conflict of interest the Coalition [Nevada Coalition to End Domestic and Sexual Violence] will not be involved in these conversations, and they were not included in the preparation of these standards."

**GMU Initial Response:** The Nevada Coalition to End Domestic and Sexual Violence "Coalition", like other organizations, is welcome to attend open meetings concerning this funding opportunity. However, GMU will focus on addressing questions and feedback from agencies directly applying for funds. During the drafting of this NOFO and policy, only GMU staff participated, ensuring that the process adhered to our established standards and avoided outside influence on final decisions. GMU values transparent dialogue and remain committed to fair consideration of rural and urban needs separately.

Question 5D: "Can you please let (agency) know if the Coalition was involved in drafting these guidelines?

**GMU Initial Response:** For further clarification, the coalition had no role in creating or reviewing any of these materials regarding this funding opportunity and learned about the meeting and documents at the same time as other stakeholders. The coalition will not be included in the decision-making or policy creation processes for this funding opportunity within our unit. While the coalition may be present at the upcoming ML meeting, at the invitation of certain agencies. Their input will only be considered if an agency expressly designates them to speak on its behalf. Otherwise, their feedback will not factor into final determinations.

### **OTHER QUESTIONS – Specifics to the ML Meeting and ML Documents**

Question 6A: Who is invited to attend the ML Policy and NOFO Review Session on February 26 at 11 AM?

**GMU Initial Response:** All prospective agencies that are interested in applying for this funding opportunity and any other organizations with interests of this funding are welcome to attend this session. Directors, CEO's, Organization Point of Contacts, Program Point of Contacts, and Program Staff are welcome to attend, participate, and ask questions. Organizations can decide who can attend from their staff. Our email list goes out to all previously identified organization and program staff.

Question 6B: What is the meeting time for the ML Policy and NOFO Review Session on February 26?

**GMU Initial Response:** The meeting time for the ML Policy and NOFO Review Session on February 26 will be 11 AM. Please disregard the 9 AM time frame. Question 6C: The copy of the documents sent are not allowing us to print or copy. Can we get a copy of the documents that do not have protections? Response: These documents were intentionally sent with protections as they are in draft status and are yet official. Once we receive feedback and take considerations, we will release the official documents.

**Question 6D:** Are the documents that were originally sent with the meeting invite for 9AM the same as the ones sent on the 11 AM time change invite?

**GMU Initial Response:** The documents sent on both emails are the same documents. No changes have been made.