

Minnesota Office of Justice Programs (OJP)
Direct Client Assistance (DCA) Guidelines
September 2024

These guidelines are to inform OJP grantees who have funds budgeted for “Direct Client Assistance” of how to properly administer DCA, including the use of vendor cards. Following these guidelines will ensure that funds are used for allowable expenses, make the maximum impact, are tracked appropriately, and are reported correctly to OJP for reimbursement. **Grantees must have a written internal policy in place that incorporates these guidelines to assist agency staff in administering DCA funds.**

Allowable Expenses & Expense Limits

Allowable Expenses

- Refer to the grant program guidelines or other allowability guidelines (e.g., the *Budget Allocation Guide* for CVS grants) for your specific grant program for the type of DCA expenses that are allowable.
- Vendor cards are allowable to meet DCA needs if they are administered in adherence to the [*Vendor Card Usage Policy*](#).
- Always contact your grant manager if you are uncertain about the eligibility of a particular DCA expense request prior to incurring the expense.

Expense Limits

If the grant program guidelines or other allowability guidelines of the grant program do not specify DCA expense limits, consider ways to maximize the impact your limited DCA funds can have by connecting clients to other community resources, such as emergency assistance, energy assistance, food shelves, churches, community groups/foundations and the [*Crime Victim Reimbursement Program*](#).

Administering Process

Once an allowable DCA expense has been identified, it is important to have the proper approval and payment processes in place.

Approvals

- Approval of DCA expenses must be documented using an internal expense authorization form (such as the [Sample DCA Authorization Form](#)). This form can be in any format but must include the date, client ID (not the client's name or initials), description of the items or services needed, reason for the assistance need (e.g., crime victimization), payment type and two agency staff signatures (e.g., the requestor and authorizer).
- All DCA expenses should have supporting documentation of the expense on file. Common documentation may include a copy of a rental lease and rent due notice from a landlord, a utilities bill/disconnection notice, or a receipt from a store purchase. Please note: supporting documents that hold personally identifiable information must be redacted if the document is requested for review by an audit or financial desk review.

Payments

- Check and credit payments should be made directly to the vendor. Cash payments to vendors should be avoided.
- Check or cash payments directly to a survivor should be avoided, except for rare situations. If the funding source allows, sufficient source documentation is required of the survivor when payment to a survivor is the only way to assist. This may include a vendor invoice, proof of payment, signed statement from the survivor, etc. Please note: supporting documents that hold personally identifiable information must be redacted if the document is requested for review by an audit or desk review.
- Only in emergency situations should agency staff pay for DCA expenses using personal funds. If/when this situation arises, staff must fill out and submit an expense reimbursement form, along with an itemized receipt along with any other relevant documentation related to the expense.
- Distribution of vendor cards for client needs must follow the [Vendor Card Usage Policy](#).

Reporting

- DCA expenses should be reported on Financial Status Reports (FSRs) at least quarterly during the grant period using the same accounting method (cash or accrual) as all other agency expenses. Vendor cards can only be claimed for reimbursement upon distribution to a client, not when purchased (see [Vendor Card Usage Policy](#)).
- Do not include any personally identifiable information on any documents shared with the Office of Justice Programs.
- FSRs that include DCA line expenses should also include the [DCA Cover Sheet](#), if applicable to your grant program (e.g., CVS grants).

Definitions:

Client ID: An ID assigned to the client by the agency.

Requestor: Staff person who is requesting authorization to provide assistance to the client.

Distribution: When the assistance is distributed to the client.

Distributor: Staff person who will be providing the assistance to the client.

Authorizer: Staff person who authorized the requestor to distribute the assistance.

Personally identifiable information (PII): *“Personally identifying information” means information about an individual that may directly or indirectly identify that individual. In the case of a victim of domestic violence, dating violence, sexual assault, or stalking, it also means information that would disclose the location of that individual. Personally identifying information includes information such as an individual’s name, address, other contact information, and social security number, but it also can include information such as an individual’s race, birth date, or number of children if, in the particular circumstances, that information would identify the individual. Personally identifying information also may include information that is encoded, encrypted, hashed, or otherwise protected.* (Source: [FAQ on the VAWA Confidentiality Provision \(justice.gov\)](https://www.justice.gov/faq/1250000))

General Guidance:

Victim service providers must never share any personally identifiable information (PII) through the vendor card distribution process with anyone outside their organization, including the Office of Justice Programs.