

**FREQUENTLY ASKED QUESTIONS**  
**Intersection of Paycheck Protection Program (PPP) Loans**  
**with VOCA Grant Funds**

**NOTE**

This FAQ document reflects guidance provided by the Office for Victims of Crime (OVC) regarding the possible intersections of the PPP Loans and VOCA grant funding. For more information about PPP loans, or other types of loans and statutes (i.e. Families First Coronavirus Response Act (FFCRA), the CARES act, and the Economic Injury Disaster Loan (EIDL)), please refer to the organizations or government departments responsible for those programs (see links provided at end of document).

1.	Where can I find PPP information (who can apply, loan details, forms, etc)	<p>US Small Business Administration: <a href="https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program-ppp">https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program-ppp</a></p> <p>US Chamber of Commerce: <a href="https://www.uschamberfoundation.org/reports/coronavirus-emergency-loans-guide-and-checklist-small-businesses-and-nonprofit">https://www.uschamberfoundation.org/reports/coronavirus-emergency-loans-guide-and-checklist-small-businesses-and-nonprofit</a></p>
2.	Are the PPP loans eligible to be used for VOCA match funds?	<p>Using funds from a private loan (whether forgiven or not) is essentially a subrecipient’s commitment of its own funds. Although the PPP loan is a federally guaranteed loan, OVC does not consider this loan (even if forgiven) to be funds “paid by the Federal Government under another Federal award” for purposes of match (see 2 C.F.R. § 200.306) – thus, such funds would be a permissible source of match for VOCA funded projects.</p> <p><i>Source: OVC</i></p>
3.	Can we use VOCA funds to replace/repay PPP loans funds and still count the PPP loan as match?	<p>No, the PPP funds become ineligible to be used as match if VOCA funds are used to pay back the PPP loan.</p> <p><i>Source: OVC</i></p>
4.	Can I modify my budget to pay for personnel (or other costs) from the PPP loan, instead of from VOCA funding?	<p>You may use PPP loan funds instead of VOCA funding for specific cost items (e.g., using PPP instead of VOCA funds for personnel, and using VOCA funds for other allowable costs) to best use available victim service funding under the circumstances. You must follow the budget modification requirements of your grant. If you have questions regarding how much you can move funds, especially for a competitive grant, please seek guidance from your Fund Coordinator.</p>
5.	Is the use of PPP funds for expenses currently covered by VOCA funds considered <b>duplication</b> ?	<p><b>Duplication</b> occurs when the subrecipient uses VOCA funds to pay for specific costs already covered by other sources. For example:</p> <p>If the subrecipient pays a staff position from the PPP loan then draws down VOCA funds to cover the same staff position, but never pays the loan back because it was forgiven, <u>the subrecipient may have duplicated costs</u> (or otherwise made an improper payment, see 2 C.F.R. 200.53), unless the forgiven loan funds are allocated to a different cost item. For example: The PPP loan paid salary for employee 1, but then reallocated to pay salary for employee 2, and then used the VOCA funds to pay for employee 1.</p>

		<p><u>If the subrecipient pays back the loan, it would not be duplication.</u></p> <p><i>Source: OVC</i></p>
6.	<p>Is the use of PPP funds for expenses currently covered by VOCA or other grant funds (or vice versa) considered <b>supplanting</b>?</p>	<p><b>Supplanting</b> occurs when a subrecipient intentionally replaces its other state or local victim service funding sources with VOCA funding. For example:</p> <p>If a subrecipient uses VOCA funds to replace a PPP loan, then repays that loan instead of keeping the loan funds under the forgiveness provisions, it would not be supplanting.</p> <p>If a subrecipient uses VOCA funds to replace a PPP loan, then uses those loan funds for another expense (whether the loan is forgiven or not), it typically would not be supplanting because PPP funding is not specifically designated for victim service purposes.</p> <p><i>Source: OVC</i></p>
7.	<p>What has changed under the second round of PPP funding?</p>	<p>Please refer to the resources in this document for specific information. The second round of funding does provide some additional access for nonprofits not included in the first round and has new eligible costs as well as more specific requirements to receive a loan and loan forgiveness. At this time no additional impacts to VOCA are noted.</p> <p>U.S Small business Administration: <a href="https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program/second-draw-ppp-loans">https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program/second-draw-ppp-loans</a></p>
7.	<p>Where can I find information on the Families First Coronavirus Response Act (FFCRA) Paid Leave Requirements?</p>	<p>U.S Department of Labor: <a href="https://www.dol.gov/agencies/whd/pandemic/ffcra-employer-paid-leave">https://www.dol.gov/agencies/whd/pandemic/ffcra-employer-paid-leave</a></p>
8.	<p>Where can I find information on the CARES Act?</p>	<p>The U.S department of Treasury: <a href="https://home.treasury.gov/policy-issues/cares">https://home.treasury.gov/policy-issues/cares</a></p>
9.	<p>When can I find information on the Economic Injury Disaster Loan (EIDL)?</p>	<p>The U.S small Business Administration: <a href="https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/economic-injury-disaster-loan-emergency-advance">https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/economic-injury-disaster-loan-emergency-advance</a></p>