



Consultation Topic: Should OVW pilot a new program that would allow recipients to provide financial assistance directly to survivors that the survivors may use to achieve safety, stability, and healing? If so, how can OVW structure such a pilot in a way that is both flexible and not subject to misuse of funds?

BACKGROUND:

Over the years, OVW has heard from tribal leaders and other stakeholders that the victim services that OVW grants support are not sufficiently flexible to address the broad range of survivors' needs. OVW therefore is exploring ways to implement a new pilot program that would provide grants to victim service providers, tribal organizations, and possibly other entities to provide flexible financial assistance to victims of sexual assault, domestic violence, dating violence, and stalking. The purpose of this grant program would be to allow OVW recipients greater flexibility to meet the needs of survivors, as survivors define those needs.

Federal funds appropriated for programs authorized by the Violence Against Women Act (VAWA) and its reauthorizations are attached to statutory provisions designed to support victim services and justice solutions addressing domestic violence, dating violence, sexual assault, and stalking (and in some programs, sex trafficking). Recipients are bound by the purpose areas, definitions, and certifications of these grant programs, and services provided to victims must be connected to their victimization. The types of support survivors need to escape violence and stabilize their lives, however, vary from person to person. Furthermore, many survivors may benefit from flexible assistance to avert a crisis, rather than having to wait until after a crisis hits (e.g., homelessness) to begin navigating a complex web of programs and services.

The COVID-19 pandemic and its attending economic destabilization accentuated the need for a grant program that provides flexible financial assistance to survivors. Before the pandemic, victim service providers participating in a one-day census conducted in 2019 by the National Network to End Domestic Violence (NNEDV) reported that 68% of unmet requests for assistance were related to housing or emergency shelter.¹ Findings a year into the pandemic showed that the situation went from bad to worse for many victims: domestic violence increased by an estimated 8% after the imposition of stay-at-home orders² and a recent study of Houston residents appears to track with broader national trends related to an increase in homelessness among victims.³ The Houston study also found that “stimulus and cash assistance programs were literally lifesaving” and domestic

¹ National Network to End Domestic Violence (2020). *14th Annual Domestic Violence Counts Report*. Washington, D.C. Retrieved from: NNEDV.org/DVCounts.

² Piquero, A. R., et al. (2021). *Domestic Violence During COVID-19: Evidence from a Systematic Review and Meta-Analysis*. Washington, D.C.: Council on Criminal Justice. Available at: https://cdn.ymaws.com/counciloncj.org/resource/resmgr/covid_commission/Domestic_Violence_During_COV.pdf.

³ Wood, L., Baumler, E., Guillot-Wright, S., Torres, E., Hairston, D., McGiffert, M., & Temple, J. R. (2021). *Harris County Health and Relationship Study*. Retrieved from: https://www.hcdvcc.org/wp-content/uploads/2021/04/ExecutiveSummary_HCHR_March21-1.pdf.



violence programs were “a vital lifeline.” Although several OVW grant programs support shelter and transitional housing, none provides cash assistance to keep victims in their homes, and few pay for housing-related costs such as utilities, furniture, and household supplies. Housing is only one example of an area where VAWA programs lack the flexibility to meet the full range of survivors’ needs.

If OVW pilots a new program that supports flexible financial assistance to survivors, it would have to determine how much flexibility survivors will have in spending the money, what financial controls would provide the appropriate level of accountability, and how OVW can fund the program. OVW seeks Tribal input on these issues.

First, OVW seeks tribal input on identifying victim needs and establishing how much flexibility survivors will have in spending the funds. Evaluations of cash assistance programs show that victims most often spent the assistance on: housing-related expenses; food and personal care items; technology; child and other household members’ needs; transportation; physical and mental health expenses; education; legal assistance; debt assistance; and other expenses related to a survivor’s safety, independence, and financial stability. These evaluations, however, were not conducted regarding tribal programs, and OVW wishes to explore whether these categories reflect the likely needs of victims in tribal communities.

Second, OVW seeks tribal input about what financial controls OVW should impose on the program. At a minimum, recipients under this program will be subject to the same regulatory requirements and award conditions that apply to other recipients of federal financial assistance from OVW, including submitting financial and performance reports, signing grant assurance documents, and complying with 2 C.F.R. Part 200. As in all its programs, OVW would expect grant recipients to implement appropriate screening measures that ensure that beneficiaries of the program are victims of domestic violence, dating violence, sexual assault, or stalking, are otherwise eligible for the assistance, and that there is a nexus between the victimization and the financial need. Additional controls might include asking survivors to fill out applications for funds for specific needs; recipients paying survivors’ expenses directly to vendors rather than giving funds to survivors to pay for their own needs; or asking survivors to submit receipts to recipients after using the funds.

Third, OVW seeks tribal input about how to fund the program. Possible funding sources include (1) a request for a Congressional appropriation for the pilot program, and (2) a reprogramming notice to Congress seeking to use de-obligated funds from OVW’s tribal-specific grant programs (in which case the program would be limited to tribal applicants) or other programs that have de-obligated funds. Each year, some recipients return unused funds, known as de-obligated funds, and, absent a reprogramming notice, OVW uses these funds for future awards under the same grant program. While funding this program with de-obligated funds is not a permanent option, it may be an appropriate way to fund a pilot project like this while evaluating its effectiveness and refining it for future implementation.

(Please see specific consultation questions on the next page.)



QUESTIONS:

- 1. What are the needs of survivors in your communities that your tribe and victim service providers have been unable to address, either with or without VAWA funding? What are the unmet needs that prevent survivors from achieving safety and healing?**
- 2. Do tribes support the creation of a pilot program that would allow recipients to give flexible financial assistance to survivors?**
- 3. What types of entities should be eligible for the pilot financial assistance grant program?**
- 4. Do tribes believe that OVW should place restrictions on how survivors may use the funds, such as establishing a limited universe of approved expenditures? If so, what types of expenditures should OVW allow?**
- 5. Would such a program be more effective if it permitted multiple small amounts be given to survivors or larger lump sums?**
- 6. What kind of support or technical assistance would tribal recipients need to implement such a program?**
- 7. What suggestions do tribes have for the financial controls that OVW should place on the program to ensure its effectiveness and fiscal responsibility?**
- 8. Do tribes support funding the program using de-obligated funds from OVW's tribal-specific grant programs or other programs with de-obligated funds?**