



National Task Force
to End Sexual and
Domestic Violence Against Women

January 30, 2012

The Honorable Patrick J. Leahy
437 Russell Senate Office Building
United States Senate
Washington, DC 20510

The Honorable Charles E. Grassley
135 Hart Senate Office Building
United States Senate
Washington, DC 20510

Re: Proposed Match Provision in the Violence Against Women Act

Dear Senators Leahy and Grassley;

The domestic violence, dating violence, sexual assault and stalking communities care deeply about accountability and transparency in federal funding of anti-violence efforts; **inefficiencies and waste deprive victims of desperately-needed services.**

Since its enactment, VAWA has included important reporting and oversight provisions both for grantees and for the Department of Justice (“DoJ”). Once again in this reauthorization, **advocates are seeking enhanced oversight and transparency** to ensure that precious federal resources are directed most effectively to the survivors of violence they are intended to serve. A summary of these accountability provisions is attached.

We are writing now to express our grave concern over the proposal of a **potentially crushing new match requirement** for VAWA grantees. The vast majority of non-profits providing services to victims of domestic violence, dating violence, sexual assault and stalking do so on extremely tight budgets, often with little or no discretionary dollars. Many of these service providers are already required by private or community-based funding sources to contribute some kind of match, whether cash or in-kind services. Since neither match funds nor grant funds can be “double counted” (rightly so), the avenues available for securing additional match dollars in order to leverage federal funding are nearly non-existent in many communities, and especially in the most underserved—rural areas, Tribes, communities of color, and communities hard-hit by the recession.

Since VAWA was first passed in 1994, grantees have been required to certify that “Any Federal funds received under this title shall be used to supplement, not supplant, non-Federal funds that would otherwise be available for activities under this title.” (42 U.S.C. § 13925 (b)) **“Non-supplantation”** means that grantees may not use program dollars raised for another purpose or program to satisfy a match requirement. Imposing a match would require programs to raise additional, unobligated funds for the sole purpose of securing federal funding. In the current economic climate, raising such funding will be nearly impossible for the many small, rural programs these dollars support. And without these critical, irreplaceable federal dollars, **programs will close their doors**, and survivors of these horrific crimes will have nowhere to turn for the shelter, counseling, legal services, medical care, or employment assistance necessary to re-start their lives and the lives of their children.

We, the undersigned, urge you in the strongest terms to **oppose a grantee match requirement in VAWA**. The hundreds of thousands of survivors who depend on the lifesaving services VAWA provides can’t afford it.

Sincerely,

Break the Cycle
Domestic Violence Report
National Alliance to End Sexual Violence
National Coalition Against Domestic Violence
National Coalition of Anti-Violence Programs
National Council of Jewish Women
National Law Center on Homelessness & Poverty
National Legal Aid and Defenders Association
National Network to End Domestic Violence on behalf of all 56 state and territorial coalitions

State, Local and Tribal Orgs

Access II Independent Living Center -- Gallatin, MO
ADV & SAS -- Streator, IL
Albuquerque SANE Collaborative -- Albuquerque, NM
Alexandra House, Inc. -- Anoka County, MN
Alliance Against Family Violence -- Leavenworth, KS
Alliance of Disability Advocates - Center for Independent Living -- NC
AMHC Sexual Assault Services -- ME
Anna Marie's Alliance -- St. Cloud, MN
Arizona Bridge to Independent Living – ABIL -- Phoenix, AZ
Arkansas Coalition Against Sexual Assault -- Fayetteville, AR
Asian Pacific Islanders Ending Sexual Violence (NAPIESV) -- Des Moines, IA
AWARE -- Hardwick, VT
Behavioral Connections -- Bowling Green, OH
Bellingham-Whatcom County Commission Against Domestic Violence -- WA
Beth Israel Rape Crisis and Domestic Violence Intervention Program -- New York, NY
Betty Griffin House -- FL
Bluff Country Family Resources, Inc. -- Hokah, MN
Casa de Esperanza, Inc. -- CA
Catholic Charities Phoenix House -- Council Bluffs, IA
Center for Persons with Disabilities -- Logan, UT
Center on Domestic Violence, University of Colorado Denver -- Denver, CO
Community Action Stops Abuse -- FL
Community Living Advocate- Benefits, Independent Living Resource Center -- Atascadero, CA
Connecticut State Independent Living Council -- CT
CONTACT Rape Crisis Center -- Huntington, WV
Covenant House -- Beckley, WV
Crime Victim and Sexual Violence Center -- NY
Crisis Center North -- PA
Crisis Center of Dodge City -- Dodge City, KS
Crisis Intervention Services -- Oskaloosa, IA
DART (Disability Abuse Response Team) -- Fairbanks, AK
DC Rape Crisis Center -- Washington, DC
DeafHope -- CA
Dear Neighbor Ministries/StepStone -- Wichita, KS
Delaware Opportunities, Safe Against Violence -- New York, NY
Denton County Friends of the Family -- TX
Department of Theatre, Marshall University -- Huntington, WV
disAbility Resource Center of the Rappahannock, Inc. -- Fredericksburg, VA

DOVES of Big Bear Valley, Inc. -- Big Bear Lake, CA
Enlace Comunitario -- NM
Family Counseling Connection -- Charleston, WV
Family Crisis Center -- Buffalo, WY
Family Crisis Center -- Great Bend, KS
Family Crisis Centers of NW Iowa -- Sioux Center, IA
Family Crisis Services -- Garden City, KS
Family Life Center of Butler County -- KS
Family Refuge Center -- Lewisburg, WV
Family Resources -- IL
Family Services Incorporated -- Altoona, PA
For All Seasons, Inc. -- Easton, MD
Friends of Yates Joyce H. Williams Center -- Kansas City, KS
Garland Waller Productions -- Boston, MA
Heart of Grant County -- Canyon City, OR
HOPE Coalition -- MN
Humboldt Domestic Violence Services -- CA
Illinois Coalition Against Sexual Assault -- Springfield, IL
Illinois Valley Safe House Alliance -- Cave Junction, OR
Kanawha County Prosecuting Attorney's Office -- Charleston, WV
Kanawha County Victim Services Center -- Charleston, WV
Kansas Coalition Against Sexual and Domestic Violence -- Topeka, KS
L.A. Gay & Lesbian Center -- Los Angeles, CA
Latinas Unidas por Un Nuevo Amanecer (L.U.N.A.) -- Des Moines, IA
Life Crisis Center, Inc. -- MD
Maine Coalition Against Sexual Assault -- ME
Marshall University -- Huntington, WV
Maryland Coalition Against Sexual Assault -- Silver Spring, MD
MensWork: Eliminating Violence Against Women -- Louisville, KY
Minnesota Network on Abuse in Later Life -- MN
Monsoon United Asian Women of Iowa & National Organization of
Mountain Crisis Services, Inc -- Mariposa, CA
Navajo United Methodist Center -- Farmington, NM
Nebraska Domestic Violence Sexual Assault Coalition -- NE
New Jersey Coalition Against Sexual Assault -- Trenton, NJ
New Mexico Coalition of Sexual Assault Programs, Inc. -- NM
New York State Coalition Against Sexual Assault -- New York, NY
New Horizons Crisis Center -- Redwood Falls, MN
Ohio Alliance to End Sexual Violence -- OH
Oklahoma Coalition Against Domestic Violence and Sexual Assault -- Oklahoma City, OK
Panhandle Crisis Center, Inc. -- Perryton, TX
Parent-Child Center -- Lexington, NE
Pearl Crisis Center -- Milaca, MN
Pennsylvania Coalition Against Rape -- Enola, PA
Phoenix Take Back the Night -- Phoenix, AZ
Polk County Crisis and Advocacy Services -- Des Moines, IA
Public Health -- St. Paul, MN
Rape Crisis Center of Medina & Summit Counties -- Medina & Akron, OH
Rape Response Services -- ME
REACH -- Charleston, WV
Rockford Sexual Assault Counseling -- , IL
Safe Place and Rape Crisis Center, Inc. -- Sarasota, FL
SAFEHOME -- Overland Park, KS
Safehome Crisis Center -- Pittsburg, KS

SafePlace -- Austin, TX
Sauti Yetu Center for African Women -- New York, NY
Sexual Assault Crisis and Support Center -- ME
Sexual Assault Prevention & Response Services -- ME
Sexual Assault Program of Beltrami, Cass & Hubbard Counties -- Bemidji, MN
Sexual Assault Resource Agency -- Red Wing, MN
Sexual Assault Response Services of Southern Maine -- ME
Sexual Assault Support Services of Midcoast Maine -- ME
Shimtu Korean Domestic Violence Program/Korean Community Center of the East Bay – Oakland, CA
South Dakota Coalition Ending Domestic & Sexual Violence -- Rapid City, SD
Southwest Arkansas Domestic Violence/Crisis Center -- De Queen, AR
Support Within Reach -- MN
Teresa's Place -- Pueblo, CO
The Battered Women's Shelter of Summit & Medina Counties -- Akron, OH
The Crisis Center, Inc. -- Manhattan, KS
The REACH Center at Mental Health Association of Columbia-Greene Counties, Inc. -- NY
The Willow Domestic Violence Center -- Lawrence, KS
Three Rivers Center for Independent Living -- Pittsburg, PA
TRCIL Services -- PA
TurnAround, Inc. -- MD
United Somali Women of Maine -- ME
University of North Texas Health Science Center -- Fort Worth, TX
Vermont Senior Companion Program -- VT
Victims Resource Center -- PA
Washington Coalition of Sexual Assault Programs – Olympia, WA
Washington State Native Am. Coalition Against Domestic Violence & Sexual Assault -- Olympia, WA
West Virginia Foundation for Rape Information and Services -- WV
West Virginia National Guard -- WV
Western Illinois Regional Council – Community Action Agency -- Maycomb, IL
Whisper n Thunder, Inc. -- AZ
WINDOW Victim Services & Visitation Center -- MN
Women Organized Against Rape -- Philadelphia, PA
Women's Resource Center for the Grand Traverse Area -- MI
Women's Resources of Monroe County, Inc. -- Delaware Water Gap, PA
Women's Aid in Crisis -- WV
Women's Center of Jacksonville, Inc. (Rape Recovery Team) -- Jacksonville, FL
Women's Resource Center -- Beckley, WV
WV Foundation for Rape Information and Services -- Fairmont, WV
Wyoming Coalition Against Domestic Violence and Sexual Assault -- Laramie, WY
YWCA of the Sauk Valley -- Sterling, IL

EXISTING VAWA ACCOUNTABILITY PROVISIONS:

- Grantee Reporting: All grantees are required by statute to limit their grant activities to program purpose areas and to submit reports on their activities to the disbursing agency. (42 U.S.C. § 13925 (b))
 - Current Department of Justice policy requires grantees to submit reports on both program activities and financial activities **every six months**.
 - The reporting forms are extensive, requiring detailed recordkeeping of every interaction with clients and every dollar spent; **often the forms are over 35 pages long**, before data is entered.
 - All data is **collected and analyzed** by the Muskie School of Public Service at the University of Southern Maine, pursuant to its *Measuring Effectiveness Initiative*.
- DoJ Reporting: Grantee reporting data (see above) provides the foundation of the Department of Justice, Office on Violence Against Women's statutorily-mandated *Biennial Report to Congress on the Effectiveness of Grant Programs Under the Violence Against Women Act*, available at: <http://www.ovw.usdoj.gov/docs/2010-biennial-report-to-congress.pdf>
- DoJ Oversight: The Department of Justice, Office on Violence Against Women is required to set aside **three percent of total disbursements** for program evaluation, including grantee site visits, financial audits, and "evaluations of promising practices or problems emerging in the field or related research, in order to inform the agency or agencies as to which programs or projects are likely to be effective or responsive to needs in the field." (42 U.S.C. § 13925 (b))
- Non-Supplanting Requirement: Since VAWA was first passed in 1994, grantees have been required to certify that "Any Federal funds received under this title shall be used to supplement, not supplant, non-Federal funds that would otherwise be available for activities under this title." (42 U.S.C. § 13925 (b))
- Prohibitions on Torts and Lobbying: Grantees have never been permitted to use federal dollars to pursue tort litigation or lobbying activities. (42 U.S.C. § 13925 (b))
- Criminal Penalties for Fraud: Anyone who fraudulently obtains or misapplies DoJ funds or assets is subject to criminal penalties. (42 U.S.C. § 3795)

PROPOSED VAWA 2012 ACCOUNTABILITY ENHANCEMENTS:

- More detailed reporting and evaluation requirements for all grantees
- Increased regulatory compliance requirements for all grantees
- Statutory audit requirements and penalties
- Limitations on conference expenditures and additional oversight provisions
- More detailed reporting requirements for DoJ
- Requirement of DoJ to post grant awards, data analysis, and other reports online within a time certain
- Repeal of unfunded or ineffective programs; Consolidation of overlapping programs
- Across-the-board reductions in program budgetary authorizations