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Congressional Committees

Subject: *Services Provided to Victims of Domestic Violence, Sexual Assault, Dating Violence, and Stalking*

Historically, domestic violence, sexual assaults, and stalking incidents have often been ignored by society and treated as private family matters. However, in 1984, Congress passed and the President signed the Family Violence Prevention and Services Act (FVPSA) to, among other things, help prevent domestic violence and provide shelter and related assistance for victims.<sup>1</sup> Grants funded under the act are administered by the Department of Health and Human Services' (HHS) Administration for Children and Families and are available to states, Indian tribal governments and organizations, state domestic violence coalitions, and public and private nonprofit entities. In response to continued concerns about domestic violence as well as sexual assault and stalking incidents, Congress passed and the President signed the Violence Against Women Act (VAWA) in 1994.<sup>2</sup> VAWA created new federal criminal laws and established additional grant programs within HHS and the Department of Justice (DOJ) for state, local, and Indian tribal governments and nonprofit organizations. These grant programs have various purposes, such as providing funding for direct services including emergency shelter, counseling, and legal services for victims of domestic violence, sexual assaults, and stalking across all segments of the population. Recipients of funds from these grant programs include, among others, state agencies, tribes, shelters, rape crisis centers, organizations that provide legal services, and hotlines. In 2000, during the reauthorization of VAWA, language was added to the law to provide greater emphasis on dating violence. The 2006 reauthorization of VAWA expanded existing grant programs and added new programs addressing, among other things, young victims, the housing and economic needs of victims, and the health care system's response to domestic violence, sexual assault, dating violence, and stalking.<sup>3</sup> In addition to being eligible to receive an array of services through VAWA-funded grant programs, victims of domestic violence, sexual assault, dating violence, and stalking are also eligible to receive services through grants awarded in accordance with the Victims of Crime Act, which are

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<sup>1</sup>Pub. L. No. 98-457, tit. III, 98 Stat. 1749, 1771-80 (1984).

<sup>2</sup>Pub. L. No. 103-322 §§ 40001-703, 108 Stat. 1796, 1902-55 (1994).

<sup>3</sup>Pub. L. No. 109-162, tits. I-VII, IX, 119 Stat. 2960, 2972-3053, 3077-84 (2006).

administered by DOJ's Office for Victims of Crime.<sup>4</sup> In fiscal year 2007, Congress appropriated \$382.5 million for violence against women programs administered by DOJ and an additional \$125 million was available for programs administered by HHS.<sup>5</sup>

The Violence Against Women and DOJ Reauthorization Act of 2005, enacted January 5, 2006, requires us to conduct a study and report on data indicating the prevalence of domestic violence, dating violence, sexual assault, and stalking among men, women, youth, and children;<sup>6</sup> to survey DOJ, as well as any recipients of federal funding, to identify what services are provided to victims of these crimes;<sup>7</sup> and to report on whether the services are made available to men, women, youth, and children, as well as the number, age, and gender of victims receiving each available service.<sup>8</sup> Congress requested this information, in part, to assist in its program oversight and appropriations decisions. On November 13, 2006, we reported on the prevalence of these four categories of crime.<sup>9</sup> In that report, we stated that current national data collection efforts address only certain subsets of these four categories of crime among some segments of the population, and that the results of these efforts cannot be combined and leveraged to determine nationwide prevalence estimates because they use different definitions and vary in scope. We recommended that DOJ and HHS take several actions to identify and address information gaps, such as determining the prevalence of dating violence among victims age 12 and older, and to the extent possible, require the use of common definitions of domestic violence, sexual assault, dating violence, and stalking when conducting or providing grants for federal research. HHS and DOJ generally concurred with these recommendations. Implementation of these recommendations will help provide Congress and agency decision makers with more comprehensive information on the prevalence of domestic violence, sexual assault, dating violence, and stalking to assist them in making policy decisions on grants and other issues associated with these four categories of crime.

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<sup>4</sup>Victims of Crime Act of 1984, § 1404, 42 U.S.C. § 10603.

<sup>5</sup>An additional \$565 million was available for compensation and assistance for victims of crimes, such as domestic violence, through the Crime Victims Fund, which was established by the Victims of Crime Act of 1984, as amended. Fines collected from individuals convicted of offenses against the United States and donations from private entities are credited to this fund, but amounts deposited in excess of \$625 million in any one fiscal year generally are not available until the following fiscal year under a provision included in each fiscal year's appropriations act.

<sup>6</sup>The 2006 reauthorization of VAWA defined the term "youth" as teen and young adult victims of domestic violence, dating violence, sexual assault, or stalking. It did not define "children." In addition, the definitions of "youth" and "children" were not consistent across the grant programs we reviewed. For example, one grant program defines "child victims" as age 12 and under, while another defines them as those under age 18 or as otherwise defined by state law.

<sup>7</sup>Unless otherwise specified, the term "victims" refers to victims of domestic violence, sexual assault, dating violence, and stalking.

<sup>8</sup>Pub. L. No. 109-162, § 119, 119 Stat. 2960, 2989-90 (2006).

<sup>9</sup>GAO, *Prevalence of Domestic Violence, Sexual Assault, Dating Violence, and Stalking*, [GAO-07-148R](#) (Washington, D.C.: Nov. 13, 2006).

This report responds to the segment of the mandate related to victim services. In addressing this segment of the mandate, we determined that conducting our own survey of grant recipients to identify services provided to victims and the demographic characteristics of victims receiving each available service was not practical and feasible for three primary reasons. First, although we reviewed electronic files provided by HHS and DOJ that contained data on hundreds of grant recipients that receive funds under each of these grant programs, we had difficulty identifying the complete population of grant recipients from these files, which was a necessary step to complete in selecting a survey sample. We had difficulty because, for example, recipients could receive grants from more than one program and could also receive grants from the same program over multiple years. Thus, eliminating duplicate counts of grant recipients was challenging and required significant resources. Second, because some of these grants are provided to states and tribes, which in turn distribute funding to other organizations that provide services, we would have had to expend considerable effort and expense to contact and obtain lists from all states and tribes to identify these additional recipients. Third, as a result of discussions with grant recipients, we could not be assured that any survey data we obtained would be consistent and reliable enough for analysis of the specific information required, i.e., the number, age, and gender of victims receiving each available service.

As an alternative, and as agreed with your offices, we focused this report on the reasons uniform and reliable demographic data by type of service might not be available for services provided to victims by federal grant recipients under VAWA, the Victims of Crime Act, and FVPSA. Thus, this report presents the results of our efforts to address the following questions:

1. What types of data have grant recipients collected and reported to HHS and DOJ related to services provided under these grant programs to victims, specifically data by type of service on the extent to which men, women, youth, and children receive each service?
2. What challenges, if any, do federal departments report that they and their grant recipients would face in collecting and reporting information on the demographic characteristics of victims receiving services by type of service, if they currently do not do so?

To answer the first question, we obtained information from and interviewed officials at HHS's Administration for Children and Families (ACF) as well as DOJ's Office for Victims of Crime (OVC) and Office on Violence Against Women (OVW). This information included reports the agencies' grant recipients are required to complete on a routine basis as well as reports the agencies provide to Congress on victim services data. We also met with state officials in Georgia, Maryland, and Texas who are responsible for administering grants under VAWA, the Victims of Crime Act, and FVPSA. We selected these states because they were geographically dispersed. We also met with 20 grant recipients that provide services, such as emergency shelter, legal advocacy, and rape crisis counseling, to victims within their communities.

During these visits, we interviewed grant recipients about the types and extent of services provided to victims using federally provided funds as well as the recipients' data collection and reporting practices and reviewed available documentation related to these efforts. In addition, we visited three other grant recipients that provide services to victims throughout the United States, including the Rape Abuse and Incest National Network, the National Center for Victims of Crime and its Stalking Resource Center, and the National Domestic Violence Hotline. We selected all of these grant recipients because they represented the different types of recipients that provide victim services—police departments, Indian tribes, legal entities, domestic violence shelters, rape crisis centers, hotlines, county governments, and college campuses. We also interviewed officials from various advocacy groups, such as Respecting Accuracy in Domestic Abuse Reporting and Men's Health Network, as well as state coalitions against domestic violence in Georgia, Maryland, and Texas and state coalitions against sexual assault in Georgia and Texas. In addition, to obtain examples of how FVPSA grant recipients were reporting victim services data to HHS, we reviewed a small sample of eight grant recipient files maintained by HHS, containing reports on the services provided to victims. At our request, ACF program staff selected grant recipients that characterized the types of grant reports received. Because we selected nongeneralizable samples of state officials, grant recipients, grant recipient files, advocacy groups, and state coalitions, the results from these interviews and file reviews cannot be used to make inferences about all members of these populations. However, we determined that the information obtained was sufficient to provide us with an understanding of the types of data being collected by grant recipients and reported to HHS and DOJ.

We also reviewed VAWA, the Victims of Crime Act, and FVPSA to determine what services were authorized to be made available to men, women, youth, and children. We focused on 11 federal grant programs that are authorized under these three statutes. We selected these grant programs following discussions with HHS and DOJ officials because the funds under these programs could be used to provide direct services to victims during fiscal year 2005. Table 1 provides a listing of these grant programs, and additional details are provided in enclosure II.

**Table 1: Grant Programs Included in GAO Review**

Agency	Grant program
Administration for Children and Families	<ul style="list-style-type: none"> <li>○ Family Violence Prevention and Services Act Grants</li> </ul>
Office on Violence Against Women	<ul style="list-style-type: none"> <li>○ STOP Violence Against Women Formula Grants Program</li> <li>○ Legal Assistance for Victims Grant Program</li> <li>○ STOP Violence Against Indian Women Discretionary Grants Program</li> <li>○ Grants to Encourage Arrest Policies and Enforcement of Protection Orders</li> <li>○ Rural Domestic Violence and Child Victimization Enforcement Grants</li> <li>○ Grants to Reduce Violent Crimes Against Women on Campus</li> <li>○ Transitional Housing Assistance Grants Program</li> <li>○ Safe Havens: Supervised Visitation and Safe Exchange Grant Program</li> </ul>
Office for Victims of Crime	<ul style="list-style-type: none"> <li>○ Victim Assistance Formula Grants</li> <li>○ Discretionary Grants</li> </ul>

Source: GAO review of federal grant programs authorized under VAWA, the Victims of Crime Act, and the Family Violence Prevention and Services Act.

To obtain information on the challenges HHS and DOJ report that they and their grant recipients would face in collecting and reporting information on the demographic characteristics of victims receiving services by type of service, we met with agency officials responsible for administering the 11 grant programs we reviewed to obtain their perspectives on this issue.

We conducted our work from May 2006 through June 2007 in accordance with generally accepted government auditing standards.

**Results in Brief**

Recipients of the 11 grant programs we reviewed currently collect and report data to the respective agencies on the types of services they provide, such as counseling, the total number of victims served, and in some cases, demographic information, such as the age of victims; however, data are not available on the extent to which men, women, youth, and children receive each type of service for all services. This situation occurs primarily because the statutes governing these programs do not require the collection of such data. However, VAWA, the Victims of Crime Act, and FVPSA authorize that a range of services can be provided to victims, and we determined that services were generally provided to men, women, youth, and children. The agencies administering these 11 grant programs collect some demographic data for certain services, such as emergency shelter under FVPSA and supervised visitation and exchange under VAWA. However, even if demographic data were available by type of service for all services, such data might not be uniform and reliable because (1) the authorizing statutes and resulting reporting requirements for the 11 grant programs differ; (2) ACF has not developed a standard form for its grant recipients to use in collecting and reporting data, and its grant recipients have not

always collected and reported data for consistent time periods;<sup>10</sup> (3) grant recipient officials assigned to manage FVPSA programs have experienced high turnover resulting in a loss of program knowledge; and (4) recipients of grants administered by all three agencies use varying data collection practices—for example, some recipients request victims to self-report data on the victim’s race, whereas other recipients rely on visual observation of the victim to obtain these data. HHS has efforts under way to improve the uniformity and reliability of data collection efforts, but does not anticipate full implementation of these efforts until fiscal year 2010. However, these efforts are not intended to collect information on the extent to which men, women, youth, and children receive each type of service or on other demographic characteristics of victims receiving services by type of service. Thus, even when these efforts are fully implemented, such data will still not exist.

HHS and DOJ reported that they would face significant challenges in collecting and reporting data on the demographic characteristics of victims receiving services by type of service for all services funded by the 11 grant programs included in our review because of concerns about victims’ confidentiality and safety, resource constraints, overburdening recipients, and technological issues. For example, according to ACF, OVC, and OVW officials, requiring grant recipients to collect this level of detail may inadvertently disclose a victim’s identity, thus jeopardizing the victim’s safety. ACF officials also said that some of their grant recipients do not have the resources to devote to these data collection efforts, since their primary focus is on service delivery. In addition, ACF officials said that being too prescriptive in requiring demographic data could overburden some grant recipients that may report data to multiple funding entities, such as federal, state, and local entities and private foundations. Furthermore, all three agencies reported that some grant recipients do not have sophisticated data collection systems in place to allow them to collect additional information.

We are not recommending that federal departments require their grant recipients to collect and report additional data on the demographic characteristics of victims receiving services by type of service because of the potential costs and difficulties associated with addressing the challenges HHS and DOJ officials identified, relative to the benefits that would be derived.

In commenting on a draft of this report, HHS generally concurred with the information presented in this report, as reflected in enclosure III. DOJ’s OVW made three overall comments regarding the presentation of this report. First, OVW expressed concern that the report did not give the agency credit for the victim services data it collects. This report acknowledges the extensive data collected by OVW, but we nevertheless clarified the report to emphasize that our focus is on whether grant recipients collect and report victim services data specifically by type of service provided to men, women, youth, and children. Second, OVW stated that this report did not include a comprehensive description of the systems it has instituted to

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<sup>10</sup> ACF officials said that this was due, in part, to differences that occurred in the reporting periods for grants.

improve the quality of its grant recipient data. We added information regarding the systems and measures OVW told us that it has in place on pages 9, 11, and 12, which we believe is sufficient to meet the objectives of this report. Third, OVW was concerned that the report does not permit the reader to associate the information presented in the report with the agency responsible for the actions being discussed. Where appropriate, we modified the report to more clearly link the data issues we identified to the specific agencies that were involved. OVW's comments are presented in enclosure IV.

### **Demographic Data on Victims Served by Type of Service Are Not Available for All Services**

Recipients of the 11 grant programs we reviewed routinely collect and report data to the respective agencies on the types of services they provide, such as counseling, the total number of victims served, and in some cases, demographic information, such as the age and sex, of these victims. Although the data these recipients collect demonstrate that they generally make services available to men, women, youth, and children,<sup>11</sup> data are not available to determine the extent to which each of these demographic groups receive each specific service. This is primarily because none of the statutes governing the 11 grant programs require the agencies to collect demographic data by type of service from grant recipients. Nevertheless, to help fulfill its statutory requirement to measure the effectiveness of its grant programs, OVW collects demographic data by program for victims served under the 8 VAWA grant programs included in our review, and each of these programs generally provides a number of services. Demographic data may be available for certain services. For example, program requirements for FVPSA grants state that recipients should report information on men, women, youth, and children who receive emergency shelter services. Furthermore, because some of the VAWA grant programs are narrowly focused on a specific type of service, such as supervised visitation and exchange or transitional housing, demographic data are collected on the victims who receive these specific services. The quantity of information collected and reported varies greatly for the 11 programs and is extensive for some, such as those administered by OVW under VAWA. The federal agencies use this information to help inform Congress about the known results and effectiveness of the grant programs.<sup>12</sup> However, even if demographic data were available by type of service for all services and all programs, such data might not be uniform and reliable for the following four reasons.

First, the authorizing statutes for these 11 grant programs have different purposes, and therefore reporting requirements must vary across the programs to be consistent

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<sup>11</sup>In some cases, grant recipients may be required to provide data on services provided to children only for those programs that were statutorily authorized to serve child victims during the time period of our review, such as the Rural Domestic Violence and Child Victimization Enforcement Grants.

<sup>12</sup>The victim services information federal agencies prepare for Congress may also be used by agency decision makers, service providers, and researchers to help evaluate the effectiveness of these programs.

with these statutes. For example, the statutes do not always authorize that services be provided to victims of all four categories of crime—domestic violence, sexual assault, dating violence, and stalking. As a result, grant recipients do not always collect and report information on the services they provide by all four categories of crime. In 2005, for instance, recipients of the Rural Domestic Violence and Child Victimization Enforcement Grant program were not authorized to provide services to sexual assault and stalking victims and therefore were not required to collect data on services provided to victims of these two categories of crime.<sup>13</sup> Similarly, the FVPSA grant program was established, in part, to provide shelter and related assistance for victims of domestic violence and their dependents. Therefore, grant recipients under this program collect and report information on the services they provide to domestic violence victims, but not to victims of the other three categories of crime. Although some of these victims may also have been subjected to multiple victimizations, such as those associated with sexual assault, dating violence, or stalking, ACF officials stated that they established data collection and reporting requirements consistent with the statute. Thus, ACF officials do not expect grant recipients under this program to collect and report information on services provided to sexual assault, dating violence, or stalking victims who are also victims of domestic violence. Furthermore, ACF officials said that it would be difficult for their grant recipients to determine the number of victims that received services by all four categories of crime because some of these victims have been subjected to multiple victimizations, such as both domestic violence and sexual assault. According to OVW officials, the agency is currently in the process of revising some of its data collection forms for several of its grant programs to capture information on services provided to victims of additional categories of crime because of the 2006 reauthorization of VAWA.<sup>14</sup> OVW officials anticipate that the changes to these data collection forms will be finalized in January 2008. They said that these revisions are designed to bring the reporting forms into conformity with the 2006 reauthorization of VAWA, thereby assisting in capturing data on all four categories of crime. However, according to OVW, these revisions are not intended to result in data being collected and reported on the demographic characteristics of victims by type of service because the 2006 reauthorization of VAWA did not require such data.

In addition, because the statutory reporting requirements vary, information collected and reported for the 11 grant programs is not always consistent or comparable across all programs. For example, recipients of FVPSA grants are required to collect data on the number and age brackets of domestic violence victims sheltered.<sup>15</sup> In contrast, recipients of Victim Assistance Formula Grants must collect data on the number of victims served who suffered child physical abuse, child sexual abuse, domestic

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<sup>13</sup>However, the reauthorization of VAWA in 2006 expanded the categories of victims authorized to receive services for this program to include sexual assault and stalking victims.

<sup>14</sup>Under the 2006 reauthorization of VAWA, victims authorized to receive services under the eight OVW grants included in our review were expanded to include victims of all four categories of crime—domestic violence, sexual assault, dating violence, and stalking.

<sup>15</sup>ACF officials told us that for the purposes of the FVPSA program, dating violence, sexual assault, and stalking are addressed to the extent that they occur within the context of domestic violence or intimate partner violence.



violence, adult sexual assault, and elder abuse, but they are not required to break down the data by gender or specific age classifications. However, OVW officials said that the office has sought to collect consistent data on victim services across its grant programs where the statutory purposes of the programs permit provision of the same types of services.<sup>16</sup>

Second, data on some FVPSA victim services appear to be inconsistent because (1) ACF has not yet developed a standard form for its grant recipients to use in collecting and reporting data, and (2) reporting periods sometimes vary among these grant recipients. As part of its program requirements, ACF requires that grant recipients report annually on several data elements, such as the number of shelters and shelter programs assisted by FVPSA program funds and the number of individuals sheltered.<sup>17</sup> However, our review of eight FVPSA grant recipient files showed inconsistencies in the type of data reported. For example, one grant recipient reported the number of individual clients served by type of service, such as counseling; one recipient reported only the number of individuals receiving shelter; one reported no data on services provided; and five appeared to report the number of times a service was provided rather than the number of individual clients served. ACF officials acknowledged that such inconsistencies are occurring and said that they are attempting to resolve them through several initiatives, such as the creation of a working group to identify a more consistent reporting mechanism. Our review also showed that FVPSA grant recipients were reporting data for different time periods, making analysis difficult. For example, our review of eight grant recipient files showed that four state grant recipients reported data for the 2005 federal fiscal year and one reported data on the state 2005 fiscal year. One tribal grant recipient reported data for calendar year 2005, one reported data for a period from May 6, 2005, until July 21, 2006, whereas another tribal grant recipient's report did not disclose the actual time period for which data were being reported. ACF officials said that these types of inconsistencies occurred when state grant recipients report data on the period in which they allocate FVPSA funds to subgrantees—either the federal or state's fiscal year—or when ACF officials were late in issuing their program announcement related to the availability of funding to tribes and tribal organizations. Because they issued these program announcements later than anticipated, ACF officials said that some grant recipients may have been confused about the reporting periods, resulting in inconsistencies. ACF officials said that they are working to eliminate these inconsistencies by issuing program announcements for FVPSA grants on a more consistent and timely basis and by clearly specifying reporting requirements and timelines.

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<sup>16</sup>OVW has established standardized forms for its grant recipients to use in reporting victim services data. These forms have consistent demographic categories across programs, where possible. They are also designed to capture aggregate data on the number of victims receiving certain categories of victim services that can be provided under multiple OVW programs, such as victim advocacy, legal advocacy, and criminal justice/court accompaniment.

<sup>17</sup>ACF also requires that grant recipients include narrative discussions in their annual reports including a description of how the needs of underserved populations were addressed.

ACF currently has several efforts under way to improve its data collection efforts for its grant programs to assist in obtaining better performance data in response to an Office of Management and Budget review done in 2005. Specifically, agency officials said that ACF joined a working group of individuals representing states, tribes, state coalitions, and other domestic violence prevention organizations to identify methods for developing more reliable data related to assessing and measuring the effectiveness of domestic violence programs. This group developed a number of survey instruments and other tools for domestic violence programs and coalitions to use to evaluate themselves. Using knowledge obtained by working with this group, ACF officials stated that they created another working group consisting of individuals representing many of these same organizations to help the agency develop measures to assess the effectiveness of grant recipients' use of FVPSA funds. These officials also said that representatives from this working group have developed specific outcome measures, such as the percentage of domestic violence survivors that have developed strategies for enhancing their safety as a result of contact with a domestic violence program receiving FVPSA funds. According to these officials, these outcome measures are currently being piloted by grant recipients in four states. Furthermore, ACF plans to expand the pilot to four additional states by July 2007 and to provide training to grant recipients on collecting these outcome data in fiscal year 2008. ACF officials also said that they plan to require their state grant recipients to begin collecting these new outcome data nationwide in fiscal year 2009. These officials stated that they also established a working group to develop a standard form to be used by its grant recipients to report information specifically related to the use of program funds. The officials said that, as part of this effort, the working group is trying to develop clearly defined data elements to help eliminate any further inconsistencies in reporting. They anticipate issuing a program announcement in January 2008 that will include these new reporting requirements for their state grant recipients and expect full implementation will occur in fiscal year 2010.<sup>18</sup> Finally, ACF officials told us that they provided funding to the National Institute of Justice for an independent study on the effectiveness of shelter services provided to domestic violence victims.<sup>19</sup> They said that the study began in June 2007, with results to be provided to ACF by June 2008. These efforts may improve the consistency and reliability of the data ACF collects and reports from its grant recipients and provide additional insights into the effectiveness of programs initiated using FVPSA funds. However, although ACF officials said that they are planning to collect information on the extent to which men, women, youth, and children are recipients of FVPSA-funded services for its program in general, they do not anticipate collecting this information by type of service because of the record-keeping burden and confidentiality issues associated with collecting such data.

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<sup>18</sup>After the program announcement is made, entities apply for the grants. HHS then reviews and awards the grants. The performance period is expected to begin on October 1 of each fiscal year for which funds are granted. Upon completion of the performance period, grant recipients then submit the required reports.

<sup>19</sup>The National Institute of Justice is DOJ's research, development, and evaluation agency dedicated to researching crime control and justice issues.

Third, some data regarding victim services appear to be unreliable because grant recipient officials assigned to manage FVPSA programs experience high turnover, resulting in a loss of program knowledge. For example, ACF officials expressed concerns regarding the quality of the data collected by some tribal grant recipients on victim services provided using funds under the Family Violence and Prevention Services Act. These officials said that their concerns stem from the high turnover rate among grant recipient officials assigned to manage the program funds. According to ACF officials, these grant recipients generally manage very small operations with about one or two staff and do not have sophisticated data collection systems in place to support their operations. They said that the official leaving the program will often take all of the recipient's institutional knowledge about the program. As a result, when responsibility for managing such funds shifts to a different official, it takes time for the new person to learn the program requirements and obtain an understanding of the issues involved. Thus, it is difficult to consistently maintain the reliability of the data collected under such circumstances.

Fourth, some grant recipients we met with reported not always collecting complete data or using varying data collection methods that could lead to inaccuracies. Specifically, 8 of the 23 grant recipients we met with made comments that raised concerns about the reliability of the data they collect on victim services. These 8 recipients included individual recipients of VAWA, Victims of Crime Act, and FVPSA funding and in some cases a combination of two of these funding sources. Four of the grant recipients said that they do not always collect complete demographic information on the victims they serve because their primary emphasis is on helping victims rather than collecting data. Furthermore, according to 4 recipients, they sometimes determine demographic data, such as a victim's race or gender, through visual observation rather than asking the victim to provide such information. Officials responsible for administering all of the grant programs we reviewed said that requiring victims to self-report demographic information is the programs' preferred method for obtaining reliable demographic information.<sup>20</sup> Using other methods could lead to inaccuracies in the data collected.

To help minimize data errors, OVW reported that it has instituted measures in its data collection system to improve the quality of data reported by its grant recipients. Specifically, electronic forms used by OVW grant recipients to report victim services data contain edit checks to help minimize reporting errors by grant recipients.<sup>21</sup> For example, if key data fields are not completed on the form or contain questionable information (e.g., the number of staff exceed expected levels) the grant recipient will receive a message asking the recipient to verify the information. Moreover, according to OVW, its data collection system will not accept the form if inconsistent

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<sup>20</sup>OVW officials said that while they prefer grant recipients providing services to require victims to self-report demographic information, they understand that it may not be practical for this to be implemented in some circumstances, such as when a victim may contact a hotline for assistance.

<sup>21</sup>In 2001, OVW entered into a cooperative agreement with a university to develop standardized forms for its grantees to use in periodically reporting victim services data and to create detailed instructions for each form to guide grant recipients through the reporting process.

information is entered (e.g., the number of victims served is not consistent with the number of victims for which age and gender information is provided). OVW also said that its staff are responsible for reviewing the completed forms submitted by its grant recipients (known as progress reports) to ensure that the data are complete and accurate and that the recipient is meeting the goals and objectives of the grant project. Moreover, if OVW staff identify a problem with the information reported by a grant recipient, OVW stated that its staff are responsible for contacting the grant recipient to obtain clarification or additional information. OVW commented that it then transmits data collected from its grant recipients to a university, with which OVW has entered into a cooperative agreement. The university conducts additional review and follow-up with grant recipients to identify and correct any erroneous data. Finally, OVW said that this university has undertaken a number of activities to enhance data collection and analysis such as providing training and technical assistance to grant recipients.

The statutes authorizing the 11 grant programs we reviewed allow for a range of services to be provided with federal grant funds to victims. Authorized services include, but are not limited to, emergency services, outreach and support, shelter and related assistance, counseling, advocacy and intervention services, transitional housing, assistance in immigration matters, civil and criminal legal assistance, and supervised visitation or safe visitation exchange of children. Although such services can be provided to all victims, OVC does not collect data on demographic characteristics, such as age, race, and gender, of victims receiving services, and ACF and OVW do not collect demographic data by the individual type of service received for all services because of the challenges discussed below.

### **HHS and DOJ Report Various Challenges Involved in Obtaining Additional Data on the Characteristics of Victims Receiving Services**

HHS and DOJ reported various challenges, including victims' confidentiality and safety concerns, resource constraints, not unduly burdening grant recipients, and technological issues, associated with collecting and reporting information on the demographic characteristics of victims receiving services by type of service. According to ACF, OVC, and OVW officials, collecting and reporting demographic data by the type of service victims receive could lead to the inadvertent disclosure of the identity of victims, thus compromising the victims' safety. Officials at OVC and ACF also noted that the statutes governing the programs they administer specifically require grantees to protect the confidentiality of records pertaining to individuals receiving services and of individually identifiable statistical data collected from victims.<sup>22</sup> In addition, although ACF officials said that such data could provide policy makers with useful information about the extent to which victim services are being made available to all segments of the population, they explained that some grant recipients do not have the resources or data collection systems in place to collect

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<sup>22</sup>Similarly, the 2006 reauthorization of VAWA added a provision requiring grantees to protect the confidentiality of persons receiving services in order to ensure their safety.

data at this level of detail for each service they provide. Furthermore, developing such systems may be very costly. In addition, ACF officials said that another challenge they would face is not being too prescriptive in requiring its grant recipients to collect demographic data that could overly burden recipients that report data to multiple funding entities. They explained that some grant recipients may obtain funding from and report to 20 or more entities. Furthermore, they said that data requirements specified by these entities vary, citing as an example that different age categories may be used by different funding entities, such as federal, state and local entities and private foundations. Thus, ACF stated it would be confronted with determining an appropriate balance between its data needs and other reporting requirements its recipients may face.

OVC and OVW expressed similar concerns about collecting additional demographic information. According to OVC officials, the required changes in reporting requirements would have significant cost implications because OVC would need to develop a new database to collect and maintain the information as well as train staff and grant recipients on how to collect the additional data. OVW officials also said that making such changes would be costly and require extensive revisions to the agency's data system as well as the data collection systems used by its grant recipients. According to these officials, some recipients reside in remote areas and do not have access to technology, such as reliable Internet connections, needed to submit the voluminous data files that would result if OVW required them to collect demographic information from victims each time they receive a service.

### **Agency Comments and Our Evaluation**

We provided a draft of this report to HHS and DOJ for comment. HHS provided written comments on July 2, 2007, and DOJ's OVW provided written comments on July 10, 2007; they are presented in enclosures III and IV respectively. HHS generally agreed with the findings in the report and provided technical comments, which we incorporated, as appropriate.

OVW had three general comments regarding the presentation of this report. First, OVW stated that the report does not describe the types of victim services data that grantees collect and report to OVW, thereby creating a misleading impression that OVW does not collect such data. We believe this report appropriately discusses the aggregate data that agencies collect from grant recipients for the 11 grant programs we reviewed. These data include the types of services provided, such as counseling, the total number of victims served, and in some cases, demographic information for victims such as age and sex. This report notes that the type of data being collected and reported by grant recipients varies according to the specific statute authorizing the grant program, but also states that the quantity of information is extensive for some programs, such as those administered by OVW under VAWA. As stated in the objectives for this report, we focused on whether grant recipients collect and report demographic data on men, women, youth, and children served by type of service and the likely accuracy of these data because our mandate required us to determine the

number, age, and gender of victims receiving each available service. However, to help ensure that our focus is clear, we made changes to this discussion in the report.

Second, while OVW maintains that a system relying on grantee self-reporting may be subject to error, it believes this report does not comprehensively describe the systems OVW has in place to improve the quality of its grant recipient data. To address OVW's concern, we included a description of the systems and measures OVW told us that it has in place on pages 9, 11, and 12, which we believe is sufficient to meet the objectives of this report.

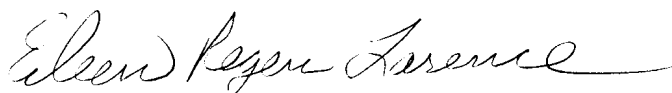
Third, while OVW acknowledges that the information presented in this report is technically accurate, it states that the report does not permit the reader to distinguish among the three agencies—OVW, OVC and ACF—and that, as a result, it appears to criticize OVW's data collection system for weaknesses it does not have. To address OVW's concern, we added information to the report to more clearly link the data issues we identified to the specific agencies that were involved in administering the grant programs. In addition, OVW stated that it was unsure whether the eight grant recipients discussed in this report that made comments raising concerns about data reliability included recipients of VAWA funding. To address this concern, we added language indicating that these eight recipients included individual recipients of VAWA funding, as well as Victims of Crime Act and FVPSA funding, and in some cases a combination of two of these funding sources.

OVC and OVW also provided technical comments, which we incorporated as appropriate.

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We are sending copies of this report to selected congressional committees, the Secretary of Health and Human Services, the Attorney General, the Director of the Office of Management and Budget, and other interested parties. We will also make copies available to others on request. In addition, the report will be available on GAO's Web site at <http://www.gao.gov>.

If your office or staff have any questions concerning this report, please contact me at (202) 512-6510 or by e-mail at [Larencee@gao.gov](mailto:Larencee@gao.gov). Key contributors for this report were Debra B. Sebastian, Assistant Director; David P. Alexander; Frances Cook; Katherine M. Davis; and Deborah S. Ortega. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report.



Eileen Regen Larence, Director  
Homeland Security and Justice Issues

Enclosures (4)

## **Enclosure I**

### **List of Committees**

The Honorable Edward M. Kennedy  
Chairman  
The Honorable Michael B. Enzi  
Ranking Member  
Committee on Health, Education, Labor and Pensions  
United States Senate

The Honorable Patrick J. Leahy  
Chairman  
The Honorable Arlen Specter  
Ranking Member  
Committee on the Judiciary  
United States Senate

The Honorable John Conyers, Jr.  
Chairman  
The Honorable Lamar S. Smith  
Ranking Member  
Committee on the Judiciary  
House of Representatives

The Honorable John D. Dingell  
Chairman  
The Honorable Joe L. Barton  
Ranking Member  
Committee on Energy and Commerce  
House of Representatives

**Enclosure II**

**Grant Programs Specifically Designed to Provide Direct Services to Victims of Domestic Violence, Sexual Assault, Dating Violence, and Stalking**

As part of this audit, we focused on 11 federal grant programs that were specifically designed to provide direct services to victims of domestic violence, sexual assault, dating violence, and stalking. Table 2 provides information on these programs, including the purpose of program, the federal agency responsible for administering the grant program, and the amount of funds appropriated for these programs in fiscal year 2005.<sup>23</sup>

**Table 2: Grant Programs Specifically Designed to Provide Direct Services to Victims of Domestic Violence, Sexual Assault, Dating Violence, and Stalking**

<b>Grant program</b>	<b>Federal agency awarding and administering grants</b>	<b>Purpose</b>	<b>Fiscal year 2005 appropriations (dollars in millions)</b>
Family Violence Prevention and Services Act Grants	Administration for Children and Families	To assist the states and tribes or tribal organizations in supporting the establishment, maintenance, and expansion of programs and projects to prevent incidents of family violence and to provide immediate shelter and related assistance for victims of family violence and their dependents.	\$126.7
Services, Training, Officers, and Prosecutors (STOP) Violence Against Women Formula Grant Program	Office on Violence Against Women	To develop and strengthen the criminal justice system's response to violence against women and to support and enhance services for victims. Each state and territory must allocate 25 percent of the grant funds to law enforcement, 25 percent to prosecution, 5 percent to courts, and 30 percent to victim services. The remaining 15 percent is discretionary within the parameters of the Violence Against Women Act (VAWA).	\$150.4
Legal Assistance for Victims Grant Program	Office on Violence Against Women	To strengthen legal assistance programs for victims of domestic violence, sexual assault, and stalking. Eligible applicants include Indian tribal governments, victim services programs, law school legal clinics, and other legal services	\$39.2

<sup>23</sup>The 2006 reauthorization of VAWA revised the title and purpose of several of these grant programs. For example, the 2006 reauthorization of VAWA changed the Stop Violence Against Indian Women Discretionary Grants program name to the Grants to Indian Tribal Governments program. It also expanded the purpose of this program to include funding for supervised visitation and exchange of children in situations involving domestic violence, sexual assault, or stalking committed by one parent against the other. Because we focused on federal grant programs that were in place during fiscal year 2005, table 2 reflects the title and purpose of programs in effect prior to the 2006 reauthorization of VAWA.



<b>Grant program</b>	<b>Federal agency awarding and administering grants</b>	<b>Purpose</b>	<b>Fiscal year 2005 appropriations (dollars in millions)</b>
		organizations that assist victims of domestic violence or sexual assault. Five percent of the funding for this program is set aside for grants to programs that assist victims of domestic violence, sexual assault, and stalking on lands within the jurisdiction of an Indian tribe.	
STOP Violence Against Indian Women Discretionary Grants Program	Office on Violence Against Women	To develop and strengthen tribal law enforcement and prosecution efforts to combat violence against Native American women and to develop and enhance services for victims of such crimes. Eligible applicants are recognized tribal governments or consortia.	\$9.2
Grants to Encourage Arrest Policies and Enforcement of Protection Orders	Office on Violence Against Women	To encourage state, local, and tribal governments and state, local, and tribal courts to treat domestic violence as a serious violation of criminal law requiring the coordinated involvement of the entire criminal justice system, including, among other purpose areas, strengthening legal advocacy service programs for victims. Eligible applicants are states, Indian tribal governments, state and local courts, and units of local government.	\$62.6
Rural Domestic Violence and Child Victimization Enforcement Grants	Office on Violence Against Women	To enhance services available to rural victims and children by encouraging community involvement in developing a coordinated response to domestic violence, dating violence, and child abuse. A state is considered rural if it has a population of 52 or fewer persons per square mile or the largest county has less than 150,000 people. In rural states, eligible applicants are state and local governments and public and private entities. Nonrural states may apply on behalf of rural jurisdictions in their states. At least 5 percent of the funding for this program must be available for grants to Indian tribal governments. Eligible applicants also include Indian tribal governments in rural and nonrural states.	\$39.2
Grants to Reduce Violent Crimes Against Women on Campus	Office on Violence Against Women	To strengthen the higher education community's response to sexual assault, stalking, domestic violence, and dating violence crimes on campuses, and to enhance collaboration between campuses	\$9.1

Grant program	Federal agency awarding and administering grants	Purpose	Fiscal year 2005 appropriations (dollars in millions)
		and local criminal justice and victim advocacy organizations. Eligible applicants are institutions of higher education as defined under the Higher Education Amendments of 1998.	
Transitional Housing Assistance Grants Program	Office on Violence Against Women	To create safe and affordable housing options for women who have left an abusive partner. Grantees will provide a wide range of flexible and optional services that reflect the differences and individual needs of battered women and their children. Services provided may include counseling, support groups, safety planning, and advocacy services as well as practical services such as licensed child care, employment services, transportation vouchers, telephones, and referrals to other agencies. Eligible applicants are states, units of local government, Indian tribal governments, and nongovernmental private entities.	\$12.3
Safe Havens: Supervised Visitation and Safe Exchange Grant Program	Office on Violence Against Women	To help create safe places for visitation with and exchange of children in cases of domestic violence, child abuse, sexual assault, or stalking. Eligible applicants are states, units of local government, and Indian tribal governments that propose to enter into contracts with public and private nonprofit entities to provide supervised visitation and safe visitation exchange of children in such cases.	\$13.9
Victim Assistance Formula Grants	Office for Victims of Crime	To provide states and territories funding to support community-based organizations that serve crime victims. Approximately 5,600 grants are made to domestic violence shelters, rape crisis centers, child abuse programs, and victim service units in law enforcement agencies, prosecutors' offices, hospitals, and social service agencies. These programs provide services that include crisis intervention, counseling, emergency shelter, criminal justice advocacy, and emergency transportation. States and territories are required to give priority to programs serving victims of domestic violence, sexual assault, and child abuse. Additional funds must be set aside for underserved	\$382.8 <sup>a</sup>

Grant program	Federal agency awarding and administering grants	Purpose	Fiscal year 2005 appropriations (dollars in millions)
		victims, such as survivors of homicide victims and victims of drunk drivers.	
Discretionary Grants	Office for Victims of Crime	To improve and enhance the quality and availability of victim services. Discretionary grants can be awarded to federal agencies, states, local units of government, individuals, educational institutions, private nonprofit organizations, and private commercial organizations. Discretionary funds support a wide range of activities, programs, and services.	\$28.6 <sup>a</sup>

Source: Departments of Health and Human Services and Justice.

<sup>a</sup>Funding for the Victims Assistance Formula and Discretionary Grants is provided through the Crime Victims Fund, which was established by the Victims of Crime Act of 1984, as amended (Victims of Crime Act of 1984, §1402, 42 U.S.C. § 10601). Fines collected from individuals convicted of offenses against the United States and donations from private entities are credited to this fund. A total of 47.5 percent of the amounts authorized as new budget authority for this fund in fiscal year 2005 was made available for the Victims Assistance Formula grants, and 5 percent was made available for the discretionary grants. According to the Office for Victims of Crime, these discretionary grants generally support national technical assistance and awareness projects, but some funds are used for direct services.

## Enclosure III

### Comments from the Department of Health and Human Services



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the Assistant Secretary  
for Legislation

Washington, D.C. 20201

JUL 2 2007

Eileen R. Larence  
Director, Homeland Security  
and Justice Issues  
U.S. Government Accountability Office  
Washington, D.C. 20548

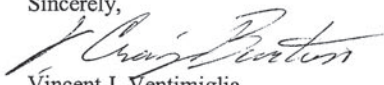
Dear Ms. Larence:

The Department of Health and Human Services generally concurs with the U.S. Government Accountability Office's (GAO) draft report entitled, "Services Provided to Victims of Domestic Violence, Sexual Assault, Dating Violence, and Stalking" (GAO-07-846R).

The Department has provided several technical comments directly to your staff.

The Department appreciates the opportunity to review and comment on this draft before its publication.

Sincerely,

  
Vincent J. Ventimiglia  
(for) Assistant Secretary for Legislation

## Enclosure IV

### Comments from the Department of Justice



**United States Department of Justice  
Office on Violence Against Women  
800 K Street, NW, Suite 920  
Washington, DC 20530**

July 10, 2007

BY E-MAIL TRANSMISSION

Eileen Regen Larence  
Director, Homeland Security and Justice Issues  
United States Government Accountability Office  
Washington, DC 20548

Dear Ms. Larence:

I have attached the Office on Violence Against Women's (OVW's) written agency comments in response to the General Accountability Office (GAO) report entitled *Services Provided to Victims of Domestic Violence, Sexual Assault, Dating Violence, and Stalking*, (GAO-07-846R Domestic Violence Services).

OVW has three overarching concerns about the presentation of GAO's draft report. First, by failing to describe the data that OVW collects, the report creates a false impression that OVW does not collect detailed data regarding grant-funded victim services. Second, GAO fails to acknowledge fully the systems that OVW has instituted to enhance the uniformity and reliability of its grantee data. Third, and closely related to the first two, GAO generally fails to distinguish OVW's efforts from those of the Office for Victims of Crime and HHS's Administration for Children and Families, which results in a distorted picture of OVW data collection efforts.

Thank you for the opportunity to comment on this draft report.

Sincerely,

A handwritten signature in cursive script that reads "May Beth Benlavan".

Acting Director

Attachment

**The Office on Violence Against Women Office’s Comments  
on GAO Draft Report, *Services Provided to Victims of Domestic Violence, Sexual  
Assault, Dating Violence, and Stalking***

The General Accountability Office’s (GAO’s) draft report on the availability of services for victims of domestic violence, sexual assault, dating violence, and stalking begins with the assertion that GAO could not conduct a survey of federal grant recipients that provide such services. Draft Report at 2-3. Instead, by agreement with Congressional offices, the report “[focuses] on the reasons the grant recipients did not collect and report reliable data to federal agencies on the services they provided to victims *by type of service*[.]” (emphasis added). *Id.* at 3. In particular, the report states that it will answer two questions: first, what types of data grant recipients collect and report to HHS and DOJ related to victim services, and second, what challenges federal agencies and grantees would face in collecting and reporting information on the demographic characteristics of victims receiving services by type of service. *Id.*

The Office on Violence Against Women (OVW) has the following three concerns about the way that GAO addresses these two questions.<sup>1</sup>

**1. The Report Creates a False Impression That OVW Does Not Collect Detailed Data Regarding Grant-Funded Victim Services.**

OVW objects that, despite purporting to address the empirical question about what data collection practices exist, the draft report never describes the types of victim service data that grantees collect and report to OVW. By omitting *any* description of OVW’s extensive data collection system, the draft report creates the misleading impression that OVW does not collect detailed, consistent data regarding services provided to victims of domestic violence, dating violence, sexual assault, and stalking by OVW grantees. In fact, OVW has committed significant time and resources over the past six years to designing, implementing, and refining a computerized progress reporting system so that it can monitor the effectiveness of grantee activities. For the record, OVW offers the following summary of its data collection activities.

**a. The VAWA Measuring Effectiveness Initiative**

In the Violence Against Women Act of 2000 (VAWA 2000), Congress required that the Attorney General report biennially on the “effectiveness” of activities carried out with Violence Against Women Act (VAWA) funds. 42 U.S.C. § 3789p. To implement this mandate, OVW entered into a cooperative agreement with the Muskie School of Public Service’s Catherine E. Cutler Institute for Child and Family Policy (the Muskie School)

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<sup>1</sup> OVW agrees with statements in the report that requiring OVW grantees to report the demographic characteristics (race, ethnicity, gender, age, etc.) of each victim served by the type of service received (crisis intervention, safety planning, counseling, victim advocacy, court accompaniment, shelter, and a panoply of other services) would be prohibitively burdensome and risk compromising victim confidentiality.

to develop and implement state-of-the-art reporting tools to capture the effectiveness of VAWA grant funding. In November 2001, the VAWA Measuring Effectiveness Initiative began to develop progress report forms for grantees to collect and report this information. As summarized in OVW's 2002 Biennial Report to Congress, the Measuring Effectiveness Initiative consulted with grantees, experts in the field, and OVW staff to determine what information should be reported by OVW's grantees and subgrantees. During FY 2003 and FY 2004, progress report forms for ten OVW discretionary grant programs were finalized, approved by the Office of Management and Budget, and made available to grantees. In FY 2005, OVW introduced report forms for State formula grant administering agencies and their subgrantees. In FY 2006, OVW implemented a new form for the newly authorized Transitional Housing Assistance Grants Program (Transitional Housing Program).

OVW and the Measuring Effectiveness Initiative tailored each grant program's form to reflect the different statutorily authorized activities that grantees perform. Thus, for example, the Legal Assistance for Victims Program (LAV Program) progress report form collects the number of custody, divorce, protection order, employment, and other cases handled by grantees, while the Grants to Encourage Arrest Policies and Enforcement of Protection Orders Program (Arrest Program) form collects information on law enforcement activities like calls for assistance and arrests made. The forms also collect uniform information on victims served, demographics, and common activities that occur across several programs (e.g., certain victim services, certain law enforcement, prosecution, and probation activities). OVW has developed computerized "smart" versions of these forms that grantees use to submit data online through the Grants Management System.

**b. OVW Data Collection Regarding Grant-Funded Services to Victims**

These progress report forms provide OVW with extraordinarily comprehensive and consistent data regarding grantee activities, including services provided to victims. The Victim Services section of the progress report form for the Arrest Program is illustrative. First, question 21 requests aggregate data on victims who were served with grant funds, who were partially served, and who were not served. Next, question 22 requests that grantees check off reasons why victims, if any, were not served. Then, question 23 directs grantees to provide aggregate demographic information regarding victims served and partially served. In particular, the form requires information regarding victims' race, ethnicity, gender, and age; the form also requests numbers of victims who have disabilities or limited English proficiency, are immigrants or who live in rural areas. Question 24 asks grantees to identify the relationship of victims to offenders (e.g., spouses or intimate partners, dating relationship). Question 25 directs grantees to report the number of victims provided with the following victim services: criminal justice advocacy/court accompaniment; victim witness notification; victim/survivor advocacy; civil legal advocacy/court accompaniment; civil legal assistance; face-to-face crisis intervention; hotline calls; counseling/support group; and hospital response. Victims counted in question 21 may be counted more than once if they received more than one service. Finally, question 26 counts the number of protection orders that victims sought

and received with the assistance of grant-funded staff.

OVW does collect demographic information about all victims served, including gender and age, although OVW cannot determine if a given victim received civil legal assistance or help seeking medical attention. A sampling of aggregate numbers from across OVW programs illustrates the type of data that OVW collects. For example, during the each six-month period between January 2004 and July 2005, grantees of OVW discretionary grant programs (that is, all then-existing OVW programs other than the STOP Violence Against Women Formula Grant Program) provided a wide range of services to 99,834 to 120,867 victims.<sup>2</sup> The majority of victims served were female (89,185 to 101,484), white (50,971 to 56,722), ages 25 to 59 (62,780 to 69,317), and had been victimized by a current or former intimate partner or spouse (76,765 to 84,634). The greatest number of victims received the following services during each six-month period: victim advocacy (35,871 to 50,717); legal advocacy (18,729 to 23,104); criminal justice advocacy/court accompaniment (27,265 to 32,591).

Also, OVW collects demographic information regarding victims by *grant program*, even if it does not collect demographic information for victims by the *type* of service they received. Accordingly, for those OVW programs that fund specialized types of victim services – the LAV Program, the Safe Havens: Supervised Visitation and Exchange Program (Safe Havens Program), and the Transitional Housing Program – OVW has demographic information that is directly linked to a type of service (respectively, legal assistance, supervised visitation and exchange, and transitional housing assistance). The GAO draft report fails adequately to explain that demographic victim data is available for these three service-specific programs.

Data from the LAV Program demonstrate the type of information that the draft report overlooks. During the two-year period between July 2003 and July 2005, LAV Program grantees provided *legal* services to more than 35,000 victims in each six-month report period. Of these victims, a significant percentage were white (44-47 percent), a majority were ages 25-59 (67-76 percent) and a substantial majority were female (96 percent).<sup>3</sup> LAV grantees handled almost 50,000 legal issues during each six-month report period. During each report period, more than 10,000 victims received help with more than one legal issue (which is a key indicator that comprehensive services are being provided). The most common legal issues addressed by these grantees were protection orders, followed by divorce, child custody and visitation, and child support.

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<sup>2</sup> OVW asks grantees to provide an unduplicated count for each report period. Therefore, to avoid duplication, OVW does not aggregate across six-month report periods the number of victims who receive grant-funded services. These ranges represent the high and low figures for the three progress report periods covered.

<sup>3</sup> In that period, 13-15 percent of victims were African American, 19-25 percent were Hispanic, 4-5 percent were Asian, and 3-4 percent were American Indian. Four percent of victims served were male. Three percent were 17 years old or younger; 17-21 percent were between the ages of 18 and 24.



**2. The Report Fails to Present a Comprehensive Description of Systems That OVW Has Instituted to Enhance the Uniformity and Reliability of Grantee Data.**

OVW objects to GAO's contention that OVW collects data that is not uniform or reliable. Draft Report at 6, 7-8, 11. In leveling this charge, the draft report fails to present a comprehensive picture of the measures that OVW has instituted to improve the reliability of its grantee data. In fact, in developing its data collection system, OVW recognized that a system that relies on grantee self-reporting, as OVW's must, may be subject to grantee error. Therefore, OVW implemented an extensive system of checks to improve the quality of grantee data.

The involvement of the Muskie School provides an ongoing mechanism to improve grantee reporting. As discussed above, OVW first entered into a cooperative agreement with the Muskie School to develop standardized reporting tools. In addition to creating the progress report forms, the Measuring Effectiveness Initiative created detailed instructions for each form to guide grantees as they report data. Since the completion of the forms and instructions, the Muskie School has focused on a number of activities to enhance data collection, data cleaning, and data analysis. These activities include: the development of a standardized training curriculum for each grant program; the ongoing provision of training for OVW grantees on how to use the report forms; the development of Access databases tailored to each program for grantees to use for collecting data; and the development of standardized syntax to facilitate the data cleaning and analysis process for grant program data. In addition, the Muskie School provides individualized technical assistance to OVW grantees via email and through a toll-free telephone line.

The progress report forms themselves contain internal checks on grantee reporting. Each grantee progress report form is a Portable Document Format (PDF) form that has been computer-coded to enhance accuracy. Grantees cannot submit their forms on the Grants Management System unless certain, internal validations are met. If key data fields are left empty or contain questionable information (e.g., the number of staff funded exceeds a single digit number), the grantee will receive a prompting message asking that it verify its information. Similarly, the system will not accept a form if basic validations are not met (e.g., the number of victims served does not match the age and gender information provided regarding those victims). These preliminary checks at the data submission stage help to minimize grantee error.<sup>4</sup>

OVW staff review of grantee progress reports also improves data reliability. Grantees submit progress reports to OVW either annually or semi-annually, depending on the

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<sup>4</sup> The subgrantee form for the STOP Violence Against Women Formula Grant Program works in a slightly different fashion because these forms are submitted first to State STOP administrators rather than directly to the Grants Management System. Although the subgrantee form contains internal validation, there is no computerized mechanism to prevent submission of a form with validation errors. State STOP administrators, however, are responsible for reviewing subgrantee reports for completeness and accuracy before submitting them to OVW.

requirements of the program. In most six-month periods, OVW will receive over 1000 progress reports. OVW staff review each report for completeness, accuracy, and to determine whether the grantee is meeting the goals and objectives of the grant project. If a staff member identifies problems with the report, the grantee is contacted for clarification or additional information. If necessary, further corrective action is taken until the reporting deficiencies are addressed and the report can be approved.

After staff approval, OVW transmits data from all progress reports to the Muskie School, where Muskie staff members engage in an additional process to correct erroneous data. To this end, the Muskie School has identified, for each form, “red flags” that indicate the need for follow-up with grantees. To cite only one example, if a grantee were to report that its OVW grant does not fund any staff salaries but claims to have used grant funds to serve 100 victims, Muskie personnel would contact the grantee for verification or explanation. Through a laborious process of re-reviewing reports and contacting grantees, Muskie staff will either correct errors or establish that no error was made.

**3. The Report Fails to Distinguish OVW’s Efforts From Those of the Office for Victims of Crime and HHS’s Administration for Children and Families, Thereby Creating a Distorted Picture of OVW’s Data Collection Efforts.**

By conflating the work of OVW, the Office for Victims of Crime (OVC) and the Administration for Children and Families (ACF), GAO has developed a report that, while technically accurate, does not permit the reader to distinguish among these agencies. As a result, the report appears to criticize OVW’s data collection system for weaknesses that, in fact, have nothing to do with OVW. In particular, the report identifies three reasons why “the data that the federal agencies collect and report from grant recipients do not appear to be uniform or reliable.” Draft Report at 8. None of these reasons points to deficiencies in OVW’s data collection.

The draft report first argues that data is unreliable because reporting requirements under the statutes authorizing these 11 grant programs were established for different purposes. *Id.*; *see also id.* at 6 (data collected and reported “do not appear to be uniform or reliable . . . because . . . reporting requirements for the 11 grant programs differ[.]”) Insofar as the reporting requirements for these 11 programs are different, this does not reflect poorly on the OVW or other federal agencies. Rather, GAO created a so-called lack of “uniformity” by refusing to consider separately 11 programs established according to three different statutory schemes (VAWA and subsequent legislation, the Victims of Crime Act, and the Family Violence and Prevention Services Act). In the case of OVW, we shaped our reporting requirements to do the following: (a) measure the statutorily-outlined grantee activities that our programs fund; (b) measure the effectiveness of these activities, as required by statute (42 U.S.C. § 3789p); (c) collect data needed to comply with Government Performance and Results Act responsibilities; and (d) meet certain statutory reporting requirements.<sup>5</sup> Where grantees perform similar activities across

<sup>5</sup> Of the eight OVW grant programs that GAO considered, four are subject to specific statutory mandates that identify particular information to be included in reports to Congress. *See* 42 U.S.C. § 3796gg-3(b) (the STOP Violence Against Women Formula Grant Program), 42 U.S.C. § 14045b(d)(3) (Grants to Combat

programs (e.g., staff hiring, training, victim services), OVW reporting requirements are standardized, consistent, and comparable; where grantees perform activities unique to a particular statutory framework (e.g., transitional housing assistance, supervised visitation), our reporting requirements vary by program.

The draft report then details, at considerable length, inconsistencies in data collected by ACF. Draft Report at 9-11. As described above, OVW collects consistent data through standardized forms with standardized reporting periods. None of the information about data inconsistency has any bearing on OVW activities.

The draft report finally concludes that data is unreliable because grant recipients do a poor job collecting data regarding victim services. Draft Report at 11. In particular, the report notes that eight of 23 grant recipients interviewed made comments that “raised concerns” about data reliability. *Id.* Here again, the report fails to distinguish among federal funding agencies, so OVW does not know whether its grantees were among these eight. Nevertheless, as already discussed, OVW has taken extensive steps to enhance the reliability of grantee data.

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Violent Crimes on Campuses), 42 U.S.C. § 13975(f) (Transitional Housing Assistance Grants Program), and 42 U.S.C. § 10420(d) (Safe Havens: Supervised Visitation and Safe Exchange Grant Program). OVW crafted the progress report forms to ensure that statutorily mandated information is reported.

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Automated answering system: (800) 424-5454 or (202) 512-7470

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## Congressional Relations

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## Public Affairs

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