

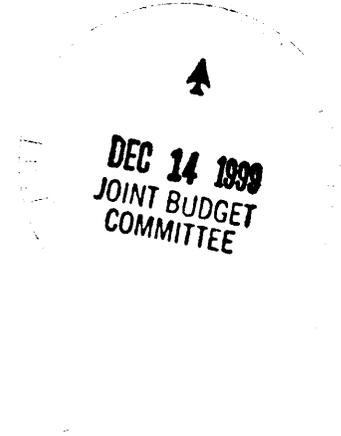


ARIZONA DEPARTMENT OF ECONOMIC SECURITY
1717 West Jefferson • P.O. Box 6123 • Phoenix, Arizona 85005

Jane Dee Hull
Governor

John L. Clayton
Director

DEC 13 1999



Richard Stavneak, Director
Joint Legislative Budget Committee
1716 West Adams
Phoenix, AZ 85007

RE: Strategic Program Area Review (SPAR) Response

Dear Mr. Stavneak:

The Department of Economic Security (DES) has reviewed the Strategic Program Area Review (SPAR) report for Domestic Violence and is providing comments per your request. Although the SPAR report addressed both the DES and the Administrative Office of the Court, the comments provided will only reference the DES Domestic Violence program.

All of the following comments are of a substantive nature; the technical comments will be presented in an attachment.

JLBC Staff Findings and Recommendations

RECOMMENDATION: JLBC Staff recommends “modifying the program by consolidating resources related to direct services to domestic violence victims in DES....”

RESPONSE: The Department acknowledges and is in full agreement with improving the system in order to enhance and expand services to domestic violence victims.

Related to the consolidation of resources, we would like to put forth the following issues for consideration:

- Consolidation may conflict with established program missions and funding requirements among the affected state agencies.
- Consolidation of resources may streamline some facets of the Domestic Violence program, but may also create duplication when two state agencies administer portions of the same fund source.
- DES would have to build relationships and expertise in areas outside its existing domestic violence program i.e. law enforcement, prosecutors, and capital improvement requirements.
- DES administrative costs would increase at a time when the primary source of funding for DES’s domestic violence program administrative cost, SSBG, is being reduced.

Mr. Richard Stavneak

Page 2

RECOMMENDATION: JLBC Staff recommends that any administrative savings generated from consolidating resources to domestic violence victims be redirected at increasing those services.

RESPONSE: We agree with this recommendation and wholeheartedly concur that any savings should be directed to expansion of services for domestic violence victims.

OSPB Findings and Recommendations

RECOMMENDATION: OSPB recommends that funding agencies participate in a new collaborative initiative to divide the resources that are available to them among the shelters so that each shelter receives the appropriate amount of funding.

RESPONSE: We concur with the OSPB perspective that increased coordination between agencies could result in more efficiently distributing resources and support any improvement in the system serving domestic violence victims.

Joint Findings and Recommendations

RECOMMENDATION: OSPB and JLBC Staff recommend that DES report to the Governor and the Legislature by June 30, 2000 on the baseline cost-effectiveness information being collected and with other recommended outcome measures that should be developed in consultation with other state agencies and interested stakeholders.

RESPONSE: We agree with the recommendation and will continue our work with the baseline cost effectiveness information. This has been a good collaborative effort working with the shelter providers. They have all expressed an interest in having a model to more accurately define their shelter activity costs and outcomes.

Additional Consideration

In the report, the paragraph prefacing the recommendation concerning administrative costs indicates that there has been no increase in the percentage of victims who moved away from the abusive situation when they left shelters (during a period when total funding has increased). We are compelled to point out that in our judgment it is very important that we do not use the percent of victims who moved away from abusive situation as an *outcome* measure for domestic violence shelter services. The purpose of the shelter program is to provide safe shelter and information to help victims make the best choices to deal with their victimization.

In closing, we would like to thank JLBC and OSPB staff for the time and attention they gave this report. Provision of domestic violence services is of key interest to the Department of Economic Security, therefore, we appreciate the substantive recommendations and information included in the report. We share a desire for an improved system of allocating domestic violence resources in a more coordinated manner with the ultimate goal of protecting and improving the lives of domestic violence victims.

Sincerely,


John L. Clayton

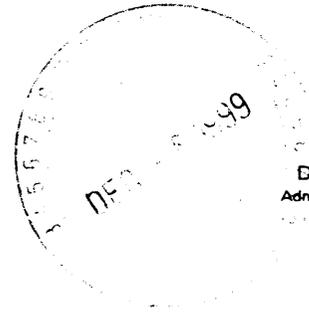
Attachment



Supreme Court

STATE OF ARIZONA
ADMINISTRATIVE OFFICE OF THE COURTS

Thomas A. Zlaket
Chief Justice



David K. Byers
Administrative Director
of the Courts

December 07, 1999

Mr. Thomas J. Betlach, Director
Office of Strategic Planning and Budget
1700 W. Washington, Suite 500
Phoenix, AZ 85007

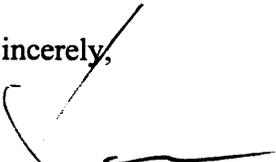
Richard Stavneak, Director
Joint Legislative Budget Committee Staff
1716 W. Adams
Phoenix, AZ 85007

Dear Mr. Betlach and Mr. Stavneak,

Thank you for the opportunity to review the Domestic Violence SPAR report, specifically those sections dealing with the Judicial Department's Domestic Violence Program. Domestic violence is a growing area of concern for the courts. More than ever, resources and programs are needed to address this problem and the number of cases going through the judicial system.

We appreciate the recognition that our program is unique, is not duplicative of other state domestic violence services programs and fits within the Judicial System's overall mission. Through this program, AOC will continue its efforts to improve the administration of justice related to domestic violence issues in Arizona communities.

Sincerely,


David Byers, Director
Arizona Supreme Court
Administrative Office of the Courts

cc: Brad Regens, JLBC Senior Fiscal Analyst
Lynn Smith, JLBC Senior Fiscal Analyst
Matt Gottheiner, OSPB Budget Analyst
Stefan Shepherd, JLBC Senior Fiscal Analyst
Monica Klaschka, OSPB Strategic Management Analyst
Marge Cawley, Administrative Office of the Courts
Agnes Felton, Administrative Office of the Courts



JANE DEE HULL
GOVERNOR
STATE OF ARIZONA

December 9, 1999

Mr. Thomas J. Betlach, Director
Office of Strategic Planning and Budgeting
1700 West Washington, Suite 500
Phoenix, AZ 85007

DEC 20 1999

Dear Tom:

Attached please find my response to your letter of November 23, to my office for Domestic Violence Prevention. I am very proud of the progress and collaborations my state agencies have made during the past year in addressing the serious issue of domestic violence.

Achieving the START Team's common goal to provide the most efficient service to domestic violence victims has been assured by the respect, dedication and teamwork that each member has exhibited. I would like to focus on some critical points in the attached report:

- Only one-third of domestic violence victims ever access shelter services and we must assure services are available to all.
- It is imperative that we approach this issue by coordinating all systems within communities leveraging criminal justice and victim services with resources available in the private sector.
- Currently, substantial differences exist in each of the funding streams.

I appreciate the efforts of both OSBP and JLBC and thank them for addressing this most critical issue.

Sincerely,

A handwritten signature in cursive script that reads "Jane Dee Hull".

JANE DEE HULL
Governor

JDH:di

B-16

**GOVERNOR'S OFFICE FOR DOMESTIC VIOLENCE PREVENTION
RESPONSE TO JOINT SPAR REPORT
December 9, 1999**

OVERVIEW:

Violence against women is a national epidemic affecting all levels of society. This complex multidimensional issue demands a societal commitment to finding a holistic solution. As with any complex situation, simple answers do not exist. Complicated conditions require focused and specialized responses best addressed by professionals in each field of expertise. National domestic violence experts have learned the most effective interventions to this crisis must come through a coordinated community response. Solutions have been proven most effective when they involve law enforcement, prosecution, courts, and victim services in their design and implementation.

Based on nationally reported incidents of domestic violence, 3.6% of the population (approximately 4 million¹) are adult female victims of domestic violence. Utilizing this factor for Arizona's population we estimate there may be approximately 67,400 adult female victims of domestic violence. The Department of Economic Security reports that approximately 14,350 adult female victims requested shelter services in SFY 1998. While beds were available for 29% of those requesting them, only 6% of the estimated number of victims were cared for in shelters. **Two-thirds of victims never access shelter services but choose to disclose to a friend, relative or a professional in the medical or religious fields.** One fact is certain -- services are required in multiple dimensions, systems and locations.

Shelter care is an important aspect of the domestic violence solution, but it is only one of the many essential tools available, and it impacts a very small percentage of those affected by violence in their homes. Directing all STOP (Services, Training, Officers and Prosecutors) funds to ACJC or DES for shelter services would result in Arizona providing services and treatment to a very small percentage of the victims of domestic violence. We would also be ignoring the effective and nationally accepted strategy of a coordinated community response involving multiple solutions and a multi-disciplinary team of professionals. ODVP is unique in its ability to leverage collaborations of systems and effectively influence professionals in a variety of fields.

What may appear to simplify and streamline the current structure to disseminate funds in domestic violence fails to take into consideration the purpose stated by the U.S. Congress and the Department of Justice or the objectives outlined by Arizona's STOP Team. A more thorough investigation and time for planning in this complex issue is required prior to initiating change that critically impacts the lives of Arizona's families.

¹ *Violence by Intimates: Analysts of Data on Crimes by Current or Former Spouses, Boyfriends, and Girlfriends*, U.S. Department of Justice, March, 1998

RESPONSE to FINDINGS

JLBC Staff Findings and Recommendations:

Despite some instances of increased collaboration, lack of coordination between state agencies still inhibits the efficient allocation of resources among domestic violence shelters.

OSPB Recommendation:

Funding agencies participate in a new collaborative initiative to divide their resources amongst the shelters so that each shelter receives the appropriate level of funding.

We agree with this finding. More time to collaborate will enable START to be more responsive and streamline services to communities. The START strategic plan under development this year will provide the framework for a coordinated response.

JLBC Recommendations:

Consolidating resources related to direct services to domestic violence victims in DES and consolidating of some law enforcement/prosecution monies in ACJC. JLBC Staff believes that coordination of these resources cannot eliminate the inherent inefficiency of six difference agencies providing direct services to domestic violence victims.

- 1. ODVP would transfer direct administration of direct services and law enforcement grants to DES and ACJC respectively. ODVP would remain responsible only for policy coordination, prevention and training.**

We strongly disagree with this finding. By accepting the STOP Formula Grant Arizona agreed to disburse those funds in a very specific manner.

1. The Department of Justice required a multi-disciplinary team to develop a comprehensive state plan for use of these funds. Approval of that plan enabled Arizona to receive that grant. The recommended JLBC recommendation does not comply with that plan
2. The funds must address seven broad purposes in criminal justice for victims of domestic violence **and sexual assault**. Funds are allocated equally (25%/category) to Law Enforcement, Prosecution and Courts, and Victim Services. The balance of these funds (25%) is discretionary and is to be allocated among the three categories.
3. All programs funded with these dollars are required to:
 - Promote collaboration within the criminal justice and victim service systems of their communities
 - Develop an evaluation plan to establish accountability

Directing these funds to shelter services would ignore two-thirds of the victims in Arizona. Neither would it fulfill the requirement that the funds also address the needs of victims of sexual assault.

Due to the volume and scope of the STOP grant program, DES and ACJC would be challenged to absorb this program without additional staff. The STOP grant restricts administrative costs to 5%. There would be no net savings in administrative costs moving STOP dollars. In fact, the costs would have to increase. ODVP distributes these dollars with a single RFP, moving them would require three separate RFPs from three separate agencies. Fiduciary responsibility, and the costs associated with it, would remain with ODVP.

The Governor applied for these funds and directs their distribution. Any change would require Department of Justice approval and modification to Arizona's STOP Plan which was created through public forums.

JLBC Recommendations: Modifying the program by consolidating resources related to direct services to domestic violence victims in DES and consolidating of some law enforcement/prosecution monies in ACJC.

- A. Transferring Direct Service Funds to DES** – DES programs differ substantially from those funded by ODVP. DES funds general program services such as domestic violence shelter operational costs while ODVP funds specific activities such as sending victim advocates to unserved rural communities. The funding provided to shelters by ODVP enhances DES domestic violence funds. The ODVP grants allow the shelters to offer services not covered by DES. Competition for grant funding under both DES and ODVP in the area of victim services is very intense. Forcing small, emerging programs to compete against larger shelters would place them at a disadvantage. The negative impact would be most acute in underserved rural communities.

DES does not fund sexual assault service providers.

DES and ODVP do not award overlapping funds. In addition, ODVP shares all fund information with members of START, including DES. STOP funds used to support domestic violence shelter services have been awarded only to programs in rural communities not currently supported by DES. These dollars have been utilized to develop domestic violence shelter services in unserved areas of our state or to provide advocacy or outreach to underserved victims. ODVP has two focuses in its funding strategy; first to provide critically needed services to rural citizens, and second to support their efforts to develop programs that will fit the criteria for eligibility of DES funding.

- B. Transferring Law Enforcement Funds to ACJC** - We disagree with this finding. ACJC's domestic violence dollars program is focused on victim assistance in the areas of information on the criminal justice system and victim compensation. Those programs do not support the requirements of the law enforcement category for STOP. Those dollars are utilized to provide:

- Specialized training in collection of evidence; study of the dynamics of domestic violence and sexual assault victims and batterers, etc.
- Development and implementation of specialized domestic violence and sexual assault policies and protocols
- Specially trained officers, prosecutors and staff working to eliminate the re-victimization of citizens by the justice system while holding

batterers accountable. National model family violence centers assure a coordinated response to domestic violence and sexual assault victims. Locating these specialized officers and prosecutor at these facilities contributes to this collaboration.

Collaboration between the criminal justice and victim service systems is a requirement of the Department of Justice. STOP Grantees must demonstrate collaboration to qualify for these program dollars, and they have done so. The JLBC recommendation would not result in increased efficiency, nor would it improve services to victims.

2. The Legislature should appropriate the portion of the federal domestic violence funding that allows states discretion in allocating these monies to direct services or law enforcement.

We disagree with this finding. As it was stated earlier, the Department of Justice requires that the discretionary funds of the STOP grant support three designated categories:

- Law Enforcement
- Prosecution and Courts
- Victim Services

Each of those categories is to receive 25% of the funds. The remaining 25% can be applied to any of the three categories.

ODVP issues a single RFP to disburse all STOP dollars. A multidisciplinary team of professionals selected by the State Procurement Office evaluates the proposals and, guided by the STOP plan, determines the programs to be funded in each category. The discretionary dollars are available to the team to enable them to fund worthy programs whose budget takes them beyond the 25% allocation.

Diverting those discretionary dollars to the Legislature would weaken the procurement process and result in a needless additional funding cycle requiring grantees to apply twice for the same money. It would result in fragmented, not streamlined services.

3. Although the total amount of funding for domestic violence has increased since the 1998 PAR, there have been few, if any increases in categories such as shelter beds available, counseling and education and outreach. There has also been no increase in the percentage of victims who moved away from the abusive situation when they left the shelter.

While we agree with the fact presented, that there is no increase in the percentage of victims who have left their abusive situation after receiving shelter care, we disagree with the conclusion drawn. We believe this fact supports our position that shelter care alone is not the solution to Arizona's domestic violence problem. A continuum of comprehensive and multi-dimensional services is required. An effective solution will include prevention, education, support, and victim advocacy services. It will also have outreach that extends far beyond a shelter's doors. A victim must have adequate housing and employment to have an alternative other than returning to her abuser.

The situation in Arizona has improved significantly in the last two years. Programs exist in areas previously void of any service. This is due in large part to the dedication and efforts of the START team members. They are determined to minimize federal and state bureaucracy, while focusing on the needs of the community.

ODVP efforts have assured advocacy to smaller communities through the Coordinated Community Response Teams. For the first time all Arizona counties have access to service. ODVP has been successful in moving communities to develop and replicate national model victim centers centralizing domestic violence and sexual assault services. Five centers are open or in the process of opening.

OSPB Staff Findings and Recommendations:

Since the original PAR in 1998, progress has been made; however, enhanced collaboration between agencies providing domestic violence services would increase efficiency.

OSPB Recommendations: Funded agencies participate in a new collaborative initiative to divide the resources that are available to them amongst shelters so that each shelter receives the appropriate amount of funding.

We agree with this finding. Effective collaborations addressing much needed funding of shelter services would benefit Arizona's residents. The recommendation to divide available resources among shelters would require additional investigation between START and the staff of the State Procurement Office, as this is a deviation from the mandated process.

JOINT FINDINGS AND RECOMMENDATIONS:

- 1. The lack of outcome measures makes it difficult to evaluate overall effectiveness of the system.**

We agree with this finding. Developing outcome measures is a top priority for START. ODVP has provided support to the STOP Grantees to enable them to develop and gather important data. Significant progress has been made but establishing standardized measures in all disciplines is critically important to the success of all domestic violence programs.

- 2. TABLE 3 (page A-5)**

We agree with this finding. STOP dollars reflected in this table were utilized for domestic violence services.

NOTE: Department of Justice requires allocation of funds to sexual assault services. Arizona only recently made progress in developing a Sexual Assault Coalition (AzSAN). Momentum in this area is building and as sexual assault programs increase, a stronger demand for dollars from the STOP Grant will be required.

3. Efficiency: Four agencies that provide funding directly to domestic violence shelters for ongoing shelter costs (DES, DPS, ODVP, ACJC) process their own applications for funding without consulting with the other state agencies that provide these funds. The grants made by the 4 agencies listed above are also not coordinated with the mostly capital grants for shelters made by the Department of Commerce or with the supportive service grants made by DHS.

ODVP disagrees with the finding that the four agencies do not collaborate. Improving efficiency and streamlining of processes is critically important to each member of START. We agree that more emphasis in this area is needed and ODVP supports that portion of this recommendation. We would like to correct the stated inaccuracies in this section.

- A. START members serve on every STOP grant evaluation committee. All funding decisions are shared openly and discussed at START meetings.
- B. Without the collaboration and assistance from the Department of Commerce, ODVP would not have been able to develop three new shelter facilities, resulting in additional beds.
- C. START conducted a public forum and invited shelter directors from shelters and safe home networks to offer their opinions about a joint RFP from multiple state agencies. The overwhelming response from participants was negative to this concept. It is surprising to learn that JLBC has received a different understanding.

4. Effectiveness: The 1998 PAR found that clients were satisfied with the services provided in domestic violence shelters. On average 96% of the clients were satisfied with the services provided. That statistic deals with individuals' experiences within shelters and does not address the overall systemic effectiveness of the DES program.

We agree with this finding. DES is very effective in providing technical assistance and support to shelter programs.

JLBC Perspective: Despite some instances of increased collaboration, lack of coordination between state agencies still inhibits the efficient allocation of resources among domestic violence shelters.

JLBC Recommendations: There has been little statewide policy determination regarding domestic violence services.

We disagree with this finding. ODVP continues to provide leadership for the Governor to state agencies and communities. Some examples are:

- At the Governor's request, staff of ODVP identified the multiple state agencies funding DV programs. The Governor's leadership pulled these agencies together to collaborate and coordinate services and form START. This collaborative entity has improved the quantity and quality of domestic violence services in communities and collaboration among state agencies.

ODVP provides leadership and direction to state agencies and individual programs.

- ODVP convenes Statewide community forums to identify needs
- ODVP chairs multidisciplinary teams (STOP/Full Faith & Credit/START)
- ODVP administers the Governor's Commission on Violence Against Women
- As a result of the STOP funds Arizona now has
 - model multidisciplinary protocols for counties, model law enforcement domestic violence training curricula
 - Domestic Violence Judicial Benchbook and training materials for court staff
 - The first legal advocacy center utilizing state Universities Colleges of Law, and other materials promoting statewide policies.
 - All materials are shared with START members and communities statewide.

We are proud of the impact the START team has had on the state domestic violence infrastructure in the short period of time since the 1998 PAR. Each member is dedicated to completing the strategic plan, evaluating program effectiveness, and developing measurable outcomes.

Office of the Director

1740 W. Adams Street
Phoenix, Arizona 85007-2670
(602) 542-1025
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JANE DEE HULL, GOVERNOR
JAMES L. SCHAMADAN, M.D., ACTING DIRECTOR

DEC 21 1999

Mr. Thomas J. Betlach
Director
Office of Strategic Planning and Budgeting
Office of the Governor
1700 West Washington, Suite 500
Phoenix, Arizona 85007

Mr. Richard Stavneak
Director
Joint Legislative Budget Committee Staff
Joint legislative Budget Committee
1716 West Adams Street
Phoenix, Arizona 85007

Dear Messrs. Betlach and Stavneak:

Thank you for the opportunity to review and comment on the Domestic Violence Strategic Program Area Review.

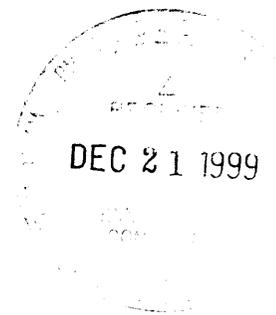
The Arizona Department of Health Services (ADHS) response to the 2000 Strategic Program Area Review on Domestic Violence includes comments on: (1) information related to the ADHS; (2) information related to the START Team and; (3) information that requires further clarification and/or justification before considering the recommendation.

1. **Information related to ADHS**

Page B-2

- "The Department of Health Services (DHS) would transfer the federal Family Violence Prevention Services Program grant to DES."

Comment: Domestic violence is recognized as a major public health issue. As the focus of these funds is on prevention of family and intimate violence, the prevention of future incidents, and ameliorating the effects of domestic violence, it is appropriate for the ADHS to administer these funds. The effects of domestic violence include physical injury, psychological trauma to adults and children, substance abuse, and a host of other health and related mental health consequences. For those community agencies awarded contracts from the Family Violence funds to provide emergency, temporary refuge for victims of domestic violence and related services, the related services include: counseling



for victims, including children; prevention (e.g., preventive health services within the domestic violence program including nutrition, disease prevention, exercise and prevention of substance abuse); domestic violence prevention programs for school age children; family violence public awareness campaigns and violence prevention; and counseling services to abusers. ADHS also has the staff, experience and expertise necessary to assure the proper administration of the funds.

Although these types of services are most appropriately monitored by ADHS and are consistent with its mission, this agency will fully support any decision the Governor would make regarding the designated state agency for the Family Violence Prevention and Services Act grant.

2. **Information related to the START Team**

Page B-6

- “The five agencies that provide funding directly to domestic violence shelters for ongoing shelter costs (DES, DHS, DPS, ODVP, ACJC) process their own applications for funding without formally consulting with the other state agencies that provide these funds.”

Comment: While the process is informal at this time, START does meet regularly to discuss funding issues and share information about funding applications, funding cycles, changes in funding allocations and other funding issues that would impact shelter funds and other domestic violence services. A major agenda item of the November, 1999 meeting of START was the issue of shelter funding, when the Request for Proposals (RFPs) would be released, the focus of the RFPs and amount of funding available. We recognize the importance of collaboration and addressing the issue of multiple funding sources. Several years ago, START members began to invite each other to be on their RFP evaluation review teams. This year, DES and DHS collaborated on an RFP. START members continue to identify ways to formalize the collaboration.

- “...The grants made by the five agencies listed above are not formally coordinated with the mostly capital grants for shelters made by the Department of Commerce.”

Comment: While the process is not formal, the Department of Commerce is an active member of START. The current representative, Paul Harris, provides START members information regarding funds available. In addition, he contacts START members individually when he has a funding request from one of the shelters that we support. START members coordinate requests from shelters seeking capital funds with the Department of Commerce representative.

3. **Information requiring further clarification and/or justification before the recommendations could be considered.**

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- “...OSPb recommends that funding agencies participate in a new collaborative initiative to divide the resources that are available to them amongst shelters so that each shelter receives the appropriate amount of funding. The eight agencies and organizations that distribute these funds should collaborate to ensure that the total amount of funding that

each shelter receives is appropriate....All of the relevant agencies and organizations should participate, and they should divide the resources that are available to them amongst the shelters so that each shelter receives the appropriate amount of funding. As this collaborative effort continues in future years, shelters will not have to use increases in state funds to offset decreases in their other funding sources.”

Comment: The report does not define “appropriate.” It is not clear in the report how “this collaborative effort” would result in the shelters not having to “use increases in state funds to offset decreases in their other funding sources.”

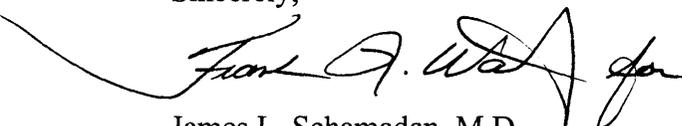
The recommendation would appear to suggest providing “formula” grants, but does not suggest a formula. The recommendation appears to assume that the agencies funding shelter services could “pool” their funds into one source and divide them amongst all shelters. As the report does not provide background information and supporting documentation for the recommendation, it is not evident if certain important factors were considered, such as: some fund sources can be distributed through a grant process, while others require procurement; some fund sources are on a state fiscal year, others on a federal fiscal year; some federal sources are formula and are awarded annually, while others are on a funding cycle (e.g. five years) and require reauthorization and annual appropriation; allocations change from year to year; some formula allocations are for one year, while others are for two; and not all fund sources can be used for the same services.

- “...These agencies may also be able to consolidate their procurement efforts with just one RFP. Shelters would only have to submit one application for funding and this would also reduce the administrative burden that multiple reporting requirements create for the providers.”

Comment: Information START received from a focus group of shelter service providers regarding a consolidated RFP indicated that they did not feel consolidation would be beneficial to the shelters. Creating one RFP would be affected by some of the same issues as distributing funds based on a formula (e.g. different funding cycles, different allocations each year). One application would not reduce the administrative burden as each fund source requires its own data for reports and applications. These data need to be provided at different times depending on the federal guidance. The providers would still need to collect and submit the required data for each fund source whether the funding came from one or multiple sources. Consolidation of funds does not eliminate the need to collect and report the required data.

Should you have any questions or need additional information, please contact Ann Tarpy, Section Manager, Injury and Disability Prevention Section, Bureau of Community and Family Health, Division of Public Health Services at (602) 542-7341.

Sincerely,



James L. Schamadan, M.D.
Acting Director



JANE DEE HULL
GOVERNOR

ARIZONA DEPARTMENT OF COMMERCE

OFFICE OF HOUSING AND INFRASTRUCTURE DEVELOPMENT

JACKIE VIEH
DIRECTOR

STEVE CAPOBRES
DIRECTOR
HOUSING & INFRASTRUCTURE
DEVELOPMENT

December 17, 1999

Mr. Stefan Shepherd, Senior Financial Analyst
Joint Legislative Budget Committee
1716 West Adams
Phoenix, Arizona 95007

DEC 20 1999

Dear Mr. Shepherd:

The Department of Commerce has reviewed the final draft of the Domestic Violence SPAR. We concur with its recommendation that the funds used by our agency to assist agencies serving victims of domestic violence are properly located in the Commerce Department and would be impractical to move to a different agency.

We believe there has been substantial inter-agency collaboration between START members that have resulted in the development of a number of new shelters and transitional housing facilities for domestic violence victims. We do agree that continuing to improve the coordination of planning and funding of new facilities by multiple state agencies is valuable and should be encouraged. Fortunately, due to close coordination with other START agency members, Commerce has been able to fund all viable domestic violence project proposals submitted to us during the past three years. We hope to continue this success in the future.

Thank you for the opportunity to review the draft. If there is any way we can assist in providing additional information for the rest of the SPAR process please don't hesitate to contact me.

Sincerely,

Paul Harris
Special Needs Housing Manager

B-27



ARIZONA DEPARTMENT OF PUBLIC SAFETY

2102 WEST ENCANTO BLVD. P. O. BOX 6638 PHOENIX, ARIZONA 85005-6638 (602) 223-2000

JANE DEE HULL
GOVERNOR

JOE ALBO
DIRECTOR

December 9, 1999

Richard Stavneak, Director
Joint Legislative Budget Committee
1716 W. Adams
Phoenix, AZ 85007

DEC 9 1999
JOINT BUDGET
COMMITTEE

Dear Mr. Stavneak:

Thank you for the opportunity to respond to the initial findings of the Domestic Violence SPAR. The attached Department of Public Safety comments should provide some additional insight.

We appreciate you keeping us informed and allowing us to expound on victim services.

Sincerely,


Roger Illingworth, Manager
Grants Administration

Attachment

DPS Response to Domestic Violence SPAR

Recommendation: JLBC Staff recommends modifying the program by consolidating resources related to direct services to domestic violence victims in DES and consolidating of some law enforcement/prosecution monies in ACJC as follows:

The Department of Public Safety (DPS) would transfer the direct services component of the federal Victims of Crime Act program (approximately 40% of the grant) to DES.

DPS Response - Disagree

- The JLBC Staff offers this recommendation to prevent service providers from having to complete multiple RFPs, track multiple budgets, compile multiple performance reports, etc. This would not be the case. Multiple funding sources cannot be combined and tracked as one. Funds must be tracked separately according to federal guidelines.

JLBC Staff is looking at the process down from state agencies, not up from service providers. JLBC Staff presumes combining multiple grants into one RFP at the state level reduces the number of applications shelters have to submit. However, each grant comes with narrowly defined scopes that have to be applied for. Multiple scopes in one RFP still equals multiple applications. The STOP grant is an example of one RFP requiring three applications. Combining public safety, housing, and social service grants into one RFP at DES will still require three separate applications just as it does now. Plus, multiple scopes on one RFP lends to confusion.

Also remember, providers have stated they do not want consolidation. This is their environment. If you consolidate all state pass-throughs into one, they still have many other sources they apply to for funds.

On average, domestic violence providers report receiving funds from two or three state agencies. The JLBC Staff reports the *possibility* of applying to eight agencies. JLBC Staff's recommendation would have no positive impact on service providers, they will still receive funds from three state agencies and many other sources. It does, however, fragment criminal justice, public safety, and housing programs.

The reporting burden will not be reduced. Each program requires specific statistics based on the specific services provided with those dollars. Therefore, separate data would still need to be reported.

- By consolidating funds at DES, the state would add another layer of bureaucracy to the administration of funds in a number of ways.

Currently, providers report the monthly financial activity directly to DPS for payment. The proposed recommendation would add two steps to this process (DES invoices DPS, DPS prepares a transfer to DES), thereby delaying payment to the provider. This delay could present additional financial implications to shelters and other non-profit organizations.

The Office for Victims of Crime (OVC) requires quarterly financial, annual performance, and subgrant award reports from DPS regarding the VOCA monies. This would require DES to gather the information from service providers and consolidate into a report and then submit that to DPS. DPS would, in turn, incorporate it into the larger statewide report and submit it to OVC.

DPS would be responsible for monitoring DES to ensure the federal dollars are expended according to federal guidelines. This would require that DPS perform site inspections on DES to review files and contracts to confirm compliance.

DPS, the VOCA Assistance administrator, is the direct contact for the federal OVC. As a result, DPS would become a messenger between DES and OVC, relaying questions and issues between the two.

- DPS awards VOCA monies to a broad range of programs, including agencies who serve victims of all types. If implemented, the JLBC Staff recommendation would negatively impact overall crime victim services.

Because DPS funds and monitors all types of victim service agencies, we are in a unique position to encourage, influence, and facilitate cooperation and coordination between these agencies. For example, DPS can influence a victim witness program to coordinate their services with the domestic violence shelter in the same region.

In fact, coordination between different disciplines has evolved to the point that the agencies are housed in the same facility. Family advocacy centers are an emerging trend at the national level and are the embodiment of community coordination. They were developed to reduce the fragmentation of services which often created system-induced trauma to people already traumatized by victimization.

The JLBC Staff recommendation is an attempt to improve coordination at the state level at the expense of coordination at the community level, which is closer to where the victims actually are. Redistributing a portion of the VOCA grant to DES would place DPS in the unenviable position of having to coordinate the coordinators, would add another level of oversight, and would distance the criminal justice perspective from the shelters.

Recommendation: JLBC Staff recommends that any administrative savings generated from consolidating resources to domestic violence victims be redirected at increasing those services.

DPS Response: Disagree on any significant administrative costs being realized

- DPS questions the assertion of any administrative savings. The JLBC Staff plan would probably be costly and not only to domestic violence programs but to the administration of public safety, criminal justice, housing and health programs having domestic violence support carved from their holistic approaches.

Recommendation: OSPB recommends that funding agencies participate in a new collaborative

initiative to divide the resources that are available to them amongst shelters so that each shelter receives the appropriate amount of funding.

DPS Response: Agree.

- As a result of the domestic violence PAR conducted in 1998, state agencies through the Staff Technical Assistance Response Team (START) have improved communication, coordination, and collaboration regarding domestic violence funding. DPS, as a START member, is a willing participant in working toward enhanced collaboration among the state agencies. In the past year, significant progress has been made. START members have participated in evaluating RFP's for the other agencies; joint RFP's have been conducted; and, when possible, combined reporting documents have been developed. Analysis has been conducted on the reporting data required for each fund source to determine the viability of developing one reporting document. START concluded the DPS and DES programs were too dissimilar to combine performance reports.

Work continues on streamlining the RFP process by examining the unique requirements of each funding source. In considering consolidation of state resources to develop one RFP for domestic violence services, START members met with shelter directors representing both rural and urban programs. Their response to this recommendation was that this would not be in the best interests of the service providers. START has developed a strategic plan (currently in draft form) to work collaboratively to assess needs, influence policies and practices, and maximize resources to reduce domestic violence and improve access to quality services for domestic violence victims in Arizona. Clearly, adequate time should be given to implement change and evaluate the progress being made.

Additional comments on the findings of the JLBC Staff as reported in the SPAR:

The JLBC Staff significantly understates the level of cooperation and coordination of state agencies facilitated by START. Because of their interaction state agencies have been able to streamline the processes of applying for grants, and reporting performance successes. START invited public input while working with DOA streamlining the grant process. This resulted in improved legislation. START even conducted financial analysis of urban shelters to explore expected funding ratios between local, state, federal government and fundraising (including United Way, foundations, thrift shops, and donations). This analysis provided START members with a keen perspective into the operations of shelters.

The JLBC Staff reports a collaborative initiative between DPS and the Governor's Office as an example of lack of coordination. The Department of Public Safety questions this assertion which was not derived from employee or supervisor interviews or review of the interagency agreement. In fact, DPS and the Governor's Office hold themselves accountable to the public by formalizing such an agreement.

The JLBC Staff reports an increase in arrests for domestic violence. DPS questions this statement as statistics indicate a significant decrease in arrests.

The JLBC Staff reports no increase in outreach since the last PAR. DPS also questions this assertion as

evidence strongly indicates otherwise.

The JLBC Staff reports there has been no increase in the percentage of victims who moved away from the abusive situation. Is this a plus? Did more families restabilize? The average battered woman leaves her abuser several times before she leaves him for good. With the increased awareness of domestic violence and associated services, more victims may be seeking help for the first time. Because of the unique dynamics associated with domestic violence, these victims entering the system for the first time may be skewing the outcome measures negatively. The unserved victim population is enormous. As more and more of these previously unserved victims enter the system, it may appear, at a glance, that the problem is getting worse instead of improving.

DPS believes outcome measures of the “overall” domestic violence problem would include the following: Incidence reduction and restabilizing the family. Measuring such outcomes is a struggle going on nationwide and DPS does agree that DES, and the rest of START, need to identify measures.

The JLBC Staff finding oversimplifies the problem:

Only a couple of state agencies are authorized to support construction (DPS is not one). Given the obvious impact of the “One Bed, One Life” program, plus the successful fund raising of some shelters to increase beds, why would a state agency fund an increase in beds before evaluating the sufficiency of this increase? The urgency now is not the accessibility of beds in Maricopa County but the administration of the beds now coming on line.

Additional beds is not the only answer to addressing the domestic violence problem. Not all individuals who experience domestic violence seek the services of a shelter. In fact, the majority of these individuals seek no services at all. By conducting more outreach and public awareness campaigns, more victims will come forward seeking assistance in various forms.

DPS’ VOCA funds are not intended to significantly support shelter operations. These funds come attached with public safety and criminal justice requirements to shelters already operating. DPS funds *enhance* services such as outpatient counseling and support groups, domestic violence hotlines, and other community-based advocacy services to keep or attract victims to the criminal justice system where offender accountability is affected. Much of the DPS “domestic violence” funding, even to shelters, is not for shelter operations. DPS has been making advancement in assuring services for sexual assault victims and others. Some of this has been achieved through outreach and collaboration with domestic violence programs. Additionally, shelters are staffing positions at criminal justice agencies, away from the shelter.

Prevention, education, and batterer accountability are issues that must also be addressed to impact the problem of domestic violence. DPS’s VOCA funds cannot be utilized for prevention. There is no *substantive* funding in Arizona for preventing domestic violence. The only *symbolic* prevention is made by the efforts of Hank Barnes and Donna Irwin of ODVP to increase awareness of the issue.

The JLBC Staff proposal would undercut ODVP’s ability to keep the public current on domestic violence issues. ODVP’s tremendous effort is almost totally dependent on the grant administration JLBC Staff proposes to transfer out. This transfer would be very costly and ineffective.



Arizona Criminal Justice Commission

December 9, 1999

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Graham County

Thomas J. Betlach, Director
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1700 West Washington, Suite 500
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Dear Mr. Betlach,

The Arizona Criminal Justice Commission (ACJC) appreciates the opportunity to respond to the SPAR. Due to the short response time, the full Commission has not had an opportunity to formally vote on the recommendations presented in the report. The following additional information is presented to provide clarification of the issues involving domestic violence funding and the criminal justice system.

The Arizona Criminal Justice Commission does not concur with the JLBC finding that lack of coordination still inhibits efficient allocation of resources. Additionally, ACJC does not concur with the JLBC recommendation to modify the program by consolidating resources.

Segmenting domestic violence programs from general victim services inhibits the effectiveness of services available to all crime victims. The Crime Victim Assistance Program provides funding for a variety of victim services programs. Removing a portion of funds for a specific type of crime diminishes the effectiveness of the entire program.

Family Advocacy Centers have been established in many counties demonstrating the cooperative efforts of several agencies coordinating services for one cause, "serving victims of crime". The goal of these centers is "One Stop Shopping". This approach has been successful in helping victims and is the heart of the START Team mission, "To work collaboratively to assess needs and maximize resources in order to reduce domestic violence and improve access to quality services in Arizona". The success of the centers demonstrates the ability of several agencies providing seamless service for one cause.

Executive Director
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The mission of the Arizona Criminal Justice Commission is to "sustain and enhance the cohesiveness, effectiveness and coordination of the criminal justice system in Arizona".

Victim Services is an integral component of the criminal justice system, ensuring justice to the citizens of Arizona through balancing defendants rights with victims needs.

Participation from victims, domestic violence shelters and other victim service providers is essential to the system. By providing funding opportunities to service providers and direct benefits to crime victims, ACJC can facilitate participation in the criminal justice system and ensure continued cooperation and collaborative efforts of all stakeholders. The DES domestic violence program is focused on the social service aspect of the domestic violence problem and does not promote, necessarily, such participation with criminal justice. The advocate positions funded by the ACJC provide a much needed link between the social service and criminal justice systems. Victims increased participation with the criminal justice system leads to increased prosecution and conviction rates in the State. Additionally, the Crime Victim Assistance Program requires programs to provide victims with assistance in obtaining victim compensation. This program requirement is essential in supporting the State Crime Victim Compensation Program.

Per ARS 41-2407, the Arizona Criminal Justice Commission administers the Crime Victim Compensation Program and the Crime Victim Assistance Program. These programs should be viewed in tandem. The legislative intent is to establish, maintain and support programs that compensate and assist victims of crime. The Crime Victim Assistance Program was established to benefit all victims of crime including victims of domestic violence. The ACJC has taken seriously the desperate need of funding for domestic violence shelters and has responded by increasing the dollars awarded to such programs.

However, the program does not allocate funds by type of victim, the funds are distributed based on an annual competitive grant process.

ACJC does concur with the OSPB recommendation that continued collaborative efforts are needed to ensure domestic violence shelters receive the appropriate level of funding and that law enforcement and prosecution funds are distributed appropriately. The START Team has been productive in many ways in improving coordination of domestic violence funding and issues.

The Team is finalizing a Strategic Plan that will steer the group for the next three years. The plan addresses strengthening communication and collaboration among agencies, conducting a needs assessment across agencies to evaluate available resources related to domestic violence services and to identify and recommend policy that positively impacts domestic violence victims.

As a result of START, ACJC and DPS combined statistical reporting requirements for the agency's Victim Assistance Programs and DES and DHS have developed a joint RFP for funding. DPS and ACJC regularly exchange information related to grant recipients. Further coordination is being developed in the area of training among the sub grantees. DPS and ACJC are also planning joint site reviews to monitor and evaluate programs.

START is compiling the annual report due to the legislature on January 1. The report identifies all domestic violence funding from state agencies and the accomplishments of the team. Over the last year, START has increasingly become more visible and involved with policy makers and customers to increase the coordination and collaboration between

all stakeholders

ACJC does not concur with the JLBC findings that consolidation will result in administrative savings. There are no administrative funds available to administer the Crime Victim Assistance Program. The agency supports the personnel and operating costs from the general budget. Fragmenting funding will result in an additional layer of reporting at the state level therefore increasing administrative costs in managing funds. Each fund source available for domestic violence services has a number of restrictions and reporting requirements. These restrictions and requirements will still need to be met and monitored by the initial agency as well as the recipient agency.

Again, ACJC appreciates the opportunity to share this information with JLBC. If you or your staff would like to discuss these points in further detail, please do not hesitate to call me at 230-0252 ext. 208.

Sincerely,



Michael D. Branham
Executive Director