

# Flexible Funding Town Hall - Written Comments

*The following comments were submitted to OPDV between 7/7/23 and 7/14/23.*

## Megan Quillinan, Mechanicville Area Community Services Center (MACSC)

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: Transportation to access direct services 2) Multiple intakes with multiple people, retelling of story over and over 3) Needing to provide "proof" of need while in crisis situation - if flowed directly through DV providers who are already working with families eliminates most of these barriers 4) Timing of assistance - being able to access funds when needed without waiting months or too much / little time lapse since an incident, police report, conviction etc tied to emergency financial assistance 5) PAPERWORK and more PAPERWORK that is so confusing even for staff and then waiting for months and months and often denied 6) Ability to use funds as needed in their individual situation - rent, beds and bedding, utilities, car repairs etc 7) Amount of funds given - to truly help keep a survivor set up on their own after leaving abuse, 6 months of bills, furniture, household necessities, security cameras, lock changes etc adds up quick - but is an investment in prevention of cycle of abuse and truly what can actually work in many cases.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: Distribute directly to dv providers. PEAFF - while strange and short time to spend funds - made a substantial impact on the lives of survivors who were lucky enough to come through our doors during that period - but- as a small agency, to receive the same amount as a much larger agency with more clients didn't make sense either - some sort of balance needs to be had - it seems to be done in OCFS funds - i.e. non-residential funds that were sliced and devastated crucial non-residential programs in more rural areas like ours - were based on number of victims served.....

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: Allocate additional funds to agencies to allow administrative time to track and distribute financial assistance. Any other way is too cumbersome - PEAFF - the downfall was the amount of staff time spent on paperwork and documentation would be insane had it been ongoing.....we need the ability to directly add admin to meet requirements within our agency for the new or

current position that will actually do the work - and that can only be determined by each individual agency. We are professionals. We can do this.

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: What's allowed / not allowed. How to track. What is expected. Same as other funding sources.

**Sara Carmichael, Sr. Program Manager of QA & Education  
Oswego County Opportunities SAF Program**

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: Some survivors are penalized for having resources and problem solving on their own. For instance, some survivors make too much to qualify for public assistance or free assistance (i.e. court appointed attorney, some TANF, etc.). Those survivors are then penalized because they do have some income.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: Funds should be given directly to individual programs as they have the workers on the ground connecting with survivors. Funding should not go to regional or state HUBs because survivors will then likely need to be referred to the provider in their county and it creates an extra step for survivors.

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: Funds should be as unrestrictive as possible in order to best meet the needs of survivors. The more restrictive the funding, the more of a burden it will place on program staff who will have to determine how to use the money and if a survivor meets the criteria.

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: I don't think programs will need any type of training in order to effectively distribute this funding. As long as the state issues some type of literature with guidance on how to use the funding and there is a person programs can contact for information, programs will be able to figure out how to use this money cause there is such a high need.

## Sara Carmichael, Sr. Program Manager of QA & Education Oswego County Opportunities SAF Program

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: There are not enough DV advocates/staff to assist survivors in getting the help and financial resources they need. Programs are woefully short staffed and underfunded.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: No answer

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: While I recognize that there is great need for this funding to go to survivors, I think it's necessary to consider whether this funding should go to DV programs to be given out to advocates and staff. Programs are woefully understaffed, and advocates are not getting paid what they deserve, which is part of the reason why programs are short staffed. Programs are struggling to utilize the money and funding they currently have because they don't have enough staff to help administer the funding and provide the services to survivors. In order to help retain the staff programs currently have, why not use this money to provide stipends to DV advocates in NYS?

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: No answer

## Angela Smith, Program Director Schoharie County DV

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: Frequently when applying to systems the survivor may be earning above what the system would allow for them to receive benefits. Or, they may have an asset that they would require them to dispose of before they are assisted. The DSS system does not have a realistic budget for people to get a very basic safe and affordable apartment; it is too low for people to live on.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to**

**distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: Programs should directly receive their funding based on their numbers served. Smaller rural programs can be lost in the shuffle of large programs in a regional or state HUB. Each community is unique and each serves survivors on a different scale.

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: Turnaround time to get the funding spent should be generous. Clear expectations on what documentation will be required from the beginning is most helpful.

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: Clear training from the beginning regarding what expenses are allowable and how to document those expenses. Ongoing access to a contract manager to provide timely technical assistance when questions arise is most helpful.

## Marisa Przepiora - Safe Harbors of the Finger Lakes

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: Too many limitations on what needs the funding can address. Too many limitations on length of time the funds can pay for, and length of time they can be accessed.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: With funding through grants to regional or state HUBS, rural programs like ours will likely not get equitable distribution because the funds will be swallowed up by downstate and larger city programs.

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: Give us the flexibility to utilize the funds following our client emergency aid procedures, rather than forcing us to create other procedures that match funding rules. Different programs and areas have different needs. For instance, there is no public transportation in two of our three counties, so bus passes are not viable. Uber is minimally available at times. Purchasing a

vehicle, paying for insurance/registration, etc. would be a huge help. We are the experts in our clients needs.

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: Do not wish to answer

## Kelley A. Gilligan, Program Director, Montgomery County Domestic Violence & CVS

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: Needing items that are not in allowable - No transportation to access services - No childcare to access services.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: We find it most helpful when funding is distributed to programs directly to distribute in their communities. Also, flexible funding for the survivors, because regional needs are very different (rural vs. suburban).

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: Depending on how the funding is distributed, there is a concern about time management for all purchases to be allowable. Documenting and auditing concerns come into the concern when parts of the funding are rolled out without clear definitions, or the documentation required. During COVID, some of the funding was provided, with instructions, allowable, and documentation after it started to be distributed.

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: No answer

## Kathy Shad, Director of Core Services, The Retreat

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: Undocumented clients are often ineligible to apply for assistance - Basic needs for utilities, rent/mortgage, gas, car repairs, gas, food - non-English speakers may have difficulty applying for and potentially obtaining needed resources if No translators are available.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: No answer

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: \*High administrative burden with minimal or no funds to pay for the additional staff time needed. \*Reimbursement systems are a financial burden on small nonprofit agencies. \*Documentation requirements from victims \*Excessive or unrealistic outcome reporting requirements.

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: \* Clear guidelines at onset of fund distribution

## Jaquetta Jenkins, First Steps To Heal

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: My clients face problems with accessing assistance because they "make too much" when they still find themselves living in poverty.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: No answer

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and**

**risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: Hello Jaquetta Jenkins from First Steps To Heal. We are hoping to soon be an approved DV provider through OCFS. Will funding be available to DV providers who are not approved?

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: No answer

## Michele Richard, Safe Horizon

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: Survivors face a gap in time from funding need funding to the time funding is received. Other barriers are eligibility requirements and access for undocumented survivors to receive funds.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: Funds available to programs directly and not have programs reimbursed for funds provided to survivors. Allow programs to determine eligibility requirements for distribution of funds.

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: Include administrative costs to programs for distribution. This work requires collaboration with Finance and Program Departments, the invisible work that must happen to facilitate distribution of funds.

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: No answer

## Wendy Linsalata, LI Against DV

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: Regardless of flexible funding, historically accessing financial resources for survivors has been a tremendous barrier due to many falling in between being TANF eligible and financially independent enough to afford things such as housing, legal assistance, car repairs, etc. While I

understand the need to have some means of eligibility in place, this has been an ongoing problem for survivors due to the nature of IPV.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: Noncompetitive process I believe would be the most equitable manner however I also recognize the challenges what with NY being so large and the number of programs within the jurisdiction. It is my opinion that the way funds were distributed based on number of survivors served, etc. in relation to each organization's jurisdiction and/or specific population served is the most fair means of distribution.

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: No answer

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: No answer

## Laura Ahearn, Crime Victims Center, Inc.

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: 1) Transportation to complete documents requiring a notary stamp. 2) Transportation to the Crime Victims Center to pick up a check for the funds being provided.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: Funding should be provided through OPDV as was done under the PEAFF funding. OPDV must require that agencies provide documentation to demonstrate how the funding was distributed.

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**



A: The CVC developed standardized internal processes and procedures to ensure that victims receiving PEAFF funds could document their eligibility.

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: Timely and accurate eligibility guidelines. Access to technical assistance to answer eligibility questions.

## Shari Fawcett, Renewal House

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: When trying to access financial resources from the system, as far as LDSS, they face hurdles of having to provide ID, birth certificates and social security cards for themselves and family members (which are often withheld by abuser). Survivors also then may want to pursue child support, or not, depending on their safety and IDV waivers. If they do pursue support, petitions are filed and these will be placed on a docket at court, many months out from the date of filing in many cases. There are waiting periods for assistance from LDSS, only after they have provided a long checklist of documents (bank statements, vehicle titles), and programs they have to report to and begin receiving services from (chemical dependency evaluations, employment services evaluations and requirements) to satisfy the opening of their LDSS cases. In addition, the budgets received from LDSS do not meet the current housing market prices of rent, food prices, utilities and such. It can take 30 days for a cash assistance budget to be determined/awarded. If they are sanctioned, from a past violation, (which can often be related in some way back to the domestic violence incidents/household they were living in) then they cannot receive assistance in cash, until they satisfy a sanction which can last 6 months from the time they reapplied. If they own a vehicle (titled in their name) that is valued above what the standard of LDSS allows, then this can be considered a financial resource that they have that makes them ineligible for cash assistance. Even though, there may have been substantial economic abuse, and they have no other cash resources upon applying. Similarly, if they own a home, and they are applying, they have been asked to sign liens on the house to LDSS before they are able to obtain cash assistance. If they cannot work because of a disability (and are not yet in receipt of Disability benefits), then they are asked to comply with proving that disability by attending a physician that is authorized to by the LDSS to evaluate the condition of the disability as a further hurdle to receiving cash benefits. In short, most systems that are available as cash/benefit resources to survivors (LDSS, unemployment, SSI/SSD) have many requirements/hurdles, and take significant time to be able to be approved and have access to needed cash assistance.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: I look at this financial funding as similar to the "flexible ways" we were able to utilize our OPDV safe housing options grant (with flexible funding opportunities for victims during the pandemic to ensure they were safely and stably housed in the community whether it was

relocating or staying in their own home in a safer manner. This was often achieved by being able to help with back rental assistance, utility assistance, Wi-Fi security cameras, cell phones and cell phone service plans purchased. This was the same with our FVPSA ARP funding that was utilized prior to our more recent FVPSA COVID Testing grants. It was much more flexible funding. Under "other expenses" there was a category specific to costs related to "Emergency Expenses for Victims Seeking Safety" broken down into further categories of rental assistance, temporary lodging/hotel, childcare or respite care for dependents, changing locks, transportation expenses, replacing vital documents, utility bills, and other emergency expenses for survivors. Our agency the first year, 8/1/21-7/31/22, expended \$27, 219.60 in this particular category alone (emergency expenses for victims). We have already expended our remaining \$27901.40 of this grant as well this contract year - solely in this same category. The first question they asked us in our annual program reports was "Please provide a detailed summary of how you used FVPSA ARP funds to meet survivor needs this year. Include specific information about how these funds have been used to provide options for survivors to access or maintain safe and stable housing in the community." The funds were critical, quick, flexible, and provided so many victims with immediate needs for safety. When immediate safety and stability needs can be addressed/alleviated, then that is the time when long term goal planning, emotional support work and further advocacy work can take place more effectively. In this link below to the FY 2024 congressional justification by OVW - they discuss financial assistance to victims and cite many helpful resources on how it may look in practice (pages 121-122).

[https://www.justice.gov/d9/2023-03/ovw\\_fy24\\_pres\\_bud\\_narrative\\_omb\\_cleared\\_3-13-2023.pdf](https://www.justice.gov/d9/2023-03/ovw_fy24_pres_bud_narrative_omb_cleared_3-13-2023.pdf)

I'm also including a link below for vaw.net that discusses flexible funding and also includes links within their description to how other organizations are using it.

<https://vawnet.org/news/how-can-i-use-funding-victims-crime-act-voca-address-housing-needs-domestic-violence-survivors>

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: I agree with many concerns on the webinar today with administrative time. I feel PEAFF was too restrictive in the way that it could only be distributed to individuals who met certain criteria (citizenship, income/TANF guidelines). As providers, we know that economic/financial abuse is very prevalent and that this could mean anyone coming to us in crisis could be in debt bondage, no money in their bank accounts, and have overdue bills in their names. These individuals would need financial assistance as well in many circumstances. Administration is also a concern, the extra COVID grants, although incredibly amazing, did require additional quarterly reports and time spent on managing these grants, as would this grant for financial assistance to survivors. I believe having documentation and paying third party by check or company credit card (printing receipts and/or having bill for copy at office), or gift cards would alleviate much of the documentation and auditing concerns (as well as having simple agreements signed by the survivor that they are receiving said gift card). But there will be times when cash would likely be the only option as well, and this again, could be a simple cash receipt form between the client and staff member. One thing to keep in mind, is that some cash assistance, and financial assistance could adversely affect an individual's TANF budget as well. Sometimes an individual assisting with rent, or food, or cash could be deemed as resources for the month that a survivor

is receiving assistance from LDSS. This could be something to keep in mind possibly for training/technical assistance areas.

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: Allowable/Unallowable expenses. OTDA training potentially, regarding how financial assistance may or may not affect an individual's open case with the Department of Social Services.

**Karen Tremer, MPA Executive, Director Chances and Changes, Inc.**

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: There are many barriers accessing financial resources for victims. The fewer restrictions the better - for example, a DV victim needs tons of "proof" depending on the funder to "prove" it is needed. They are overwhelmed already, and this is yet another hurdle. Whether they have children or not should not be a barrier to accessing funding and should not be a barrier to receiving financial help.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: I/we are overloaded with paperwork and to have to again "compete" with sister agencies for meager funds is yet another administrative burden and not an equitable method anyway. Each agency knows its communities well and can be/are more responsive and know how to best use these funds for our clients vs. having some regional or state hub doing the management/distribution of funds - another barrier not only to clients but to the agencies. This would also take funding from an already meager allocation (5M) for operation of hubs or one larger hub - put the money where it will be used by victims - in their local agencies. Distributing funds to each agency will also assure that the funds reach the clients quickly as we would not be competing against other agencies to grab funds from the regional or state entity - another time-consuming wait as well if you could even get funding - this would actually be competition again. Turnaround time locally is much faster than going through an intermediary. It also assures everyone (agency) can get these funds. For example, we have little cash reserve and no endowments, no business donations/sponsors, etc., etc. (location, location, location....). Larger agencies do have these advantages and the opportunities for them are always greater than for smaller agencies. Using regional or state hubs sets us up again for competition for meager funds to get funds that may have been already called/used by other, usually larger, agencies. Don't put the burden on a survivor to have to ask a region or state entity for assistance - WHY would that even be under consideration as this is a great way to retraumatize victims when they are trying to become survivors. NOT a trauma informed practice in any way in my book.

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: Like with any grant - depending on the grant "allowable" that would determine what client is "eligible" and for what. Every grant has a process and accounting for each grant - is what we do all the time. This would fit into an existing matrix of accounting and managing processes based on this grant's final parameters. I am not sure here on what you mean by "risk management concerns".

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: Again, it depends on the complexities of the grant parameters which are still TBD. Some grants are extremely onerous with many levels of processes and moving parts. Others are less complex and relatively easy, but all are given the same level of accountability for their use. So, it all depends on the final grant parameters but keeping it simple (KIS) is always more effective in reaching clients more rapidly than to have unnecessary multiple layers of process and procedure above and beyond what is truly necessary. Having clear basic parameters helps here in how much "technical assistance" or "training" one would need - how necessary is training and technical assistance for this grant? Seems it should be minimal and not be a burden on the agency or the individual client. Seems from experience, the more "technical" a grant is the less funds actually reach the intended recipient - the client. We already have too much bureaucracy and little autonomy to do what we should be doing - focusing on and working on services provision with the clients and assisting/supporting front line staff with the difficulties we all face of this field - not continually wrestling with tons of paperwork and dealing with "systems" that are counter intuitive to these best practices" of client support - long term. Clients don't just "get over it" - it is a long term and difficult process at present for the clients and staff in this endeavor. There has to be a better way to do all this.....overall unified stable funding DV would really help.

**Emmeline Stroman, Co-Director at Vera House Main Shelter.**

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: Some hurdles that we see survivors face, are not having proper documentation, no photo ID, no social security cards, no birth certificates. Other hurdles are just not knowing how to access them, or not believing that they are eligible.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: I believe the state should find out the what the biggest needs are in the individual programs. For example, we have survivors that have no income, some have immigration issues going on so they cannot work and also can't apply for certain services. We find them services to pay for

their apartments, but they cannot get utilities in their name. Some survivors move into their apartments with no furniture, we try to provide beds but other furniture we are not able to provide because of the funding or shortages in donations.

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: The main concern is just knowing exactly what we can and cannot use the funding for.

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: No answer

## Christine Rodriguez, Director of DV and Youth Services

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: \*Excessive eligibility requirements beyond being a victim of DV, such as: Medicaid, TANF, FS eligible; having a dependent child; resource of last resort; criminal and/or substance abuse history; DSS sanctions; having tangible assets \*having bank accounts established \*having a need higher than resource will cover \*Documentation requirements from victims

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: No Answer.

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: \*High administrative burden with minimal or no funds to pay for the additional staff time needed. \*Reimbursement systems are a financial burden on small nonprofit agencies. \*Documentation requirements from victims \*Excessive or unrealistic outcome reporting requirements

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: \* Clear guidelines at onset of fund distribution

## Gabriela Sandoval Requena, Director of Policy & Communications at New Destiny Housing

### **Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: Documentation requirements from survivors, such as police incident reports, limits access financial resources. Self-attestation should suffice. Undocumented survivors have historically have not been able to access financial resources. Most undocumented survivors were not able to access OPDV's Pandemic Emergency Assistance Funding (PEAF) since funding was subject to Temporary Assistance for Needy Families (TANF) income eligibility and verification systems. Only survivor families with mixed immigration status, such as citizen children with parents who are not eligible due to their immigration status, were able to access PEAFF. Survivor families without any US citizens should be eligible. Income level requirements that are too low, like 200% of the federal poverty line, keep many survivors out of financial resources. Survivors earning up to 300% of the federal poverty line should be eligible. Narrow definitions of allowable expenses also represent a significant hurdle for survivors. For instance, federal service funding made available by the United States Department of Housing and Urban Development through local Continuums of Care can be used to cover most emergency needs, such as utility arrears, moving costs, and healthcare, but not furniture or groceries. Similarly, PEAFF did not cover child-care, transportation, or short-term education and training. All of these expenses should be covered.

### **Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: Research has demonstrated that flexible funding that's directly payable to survivors, or to third parties on their behalf, can swiftly address critical needs. Survivors know better than anyone else what will help or hinder their stabilization, and how to best make use of flexible funding. Programs that include low-barrier access, rapidly provide funds, and offer survivor-driven advocacy and safety planning have proven to be successful. Organizations that have mechanisms in place are likely better fit to disburse flexible funding quickly and directly to survivors, such as entities that already operate rapid rehousing programs. We encourage the State to expand program participation beyond domestic violence shelter providers, or OCFS licensed entities, to include nonprofits running rapid rehousing or other permanent housing programs for domestic violence survivors.

### **Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: In order to ensure that nonprofits and program participants flow flexible funding to survivors in a timely manner, the State should include an administrative set aside of 10-15% in this initiative. While this will decrease the total amount available for actual flexible funding, covering administrative costs is critical for the success of the program. Additionally, the State should try

to move away from a reimbursement model and provide funding upfront to nonprofits and program participants. Reimbursement models put a financial burden on nonprofits, especially smaller organizations with limited cash at hand and an administrative burden on the agency. The nonprofit can bear this burden because the administrative allowance would cover accounting and auditing costs.

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: Scheduling biweekly office hours to allow nonprofits and program participants to ask questions, address issues, and discuss topics with the overseeing State agency would be helpful. The State should also consider providing a space for nonprofits and program participants to huddle and compare best practices.

## Aditi Bhattacharya, New York City Anti Violence Project

**Q: What hurdles do survivors face when trying to access financial resources from the system?**

A: When recipients need to prove eligibility through lots of paperwork, it is a major barrier for clients who are in crisis and need funds expediently. The fact that a survivor has taken the step to access services from a community-based organization is proof enough that they are eligible for funds. Documentation is especially challenging for trans and gender non-conforming survivors who may have identity documents that do not match their name or gender presentation, and for undocumented immigrant survivors of violence.

**Q: How should the State determine how funding passes through individual programs to ensure the most equitable reach to all survivors? Such as grants to many programs to distribute funds directly in their community; or grants to regional or state HUBs to distribute funding across the state as requested by survivors; or other options?**

A: No answer

**Q: What are the administrative or operational concerns for programs related to getting this money to survivors the most flexible way possible? What are the compliance and risk management concerns? What are the documentation and auditing concerns that a program might have?**

A: When staff are able to select recipients and decide where funding goes, barriers are removed. However, when onus of reporting and proof is put on the staff and the government agency doesn't provide funding to support staff and administrative time, this takes staff away from time they would otherwise spend providing services. Flexibility in the types of tools of disbursement is also key, and making funds available as cash, gift card, and other accessible forms is important.

**Q: What type of training and technical assistance should the state provide grantee programs to effectively distribute this funding?**

A: No answer

July 14, 2023

Kelli Owens  
Executive Director  
NYS Office for the Prevention of Domestic Violence  
Alfred E. Smith Building, Room 1157  
80 South Swan Street  
Albany, NY 12210

Submitted via e-mail at: [DVSafeHousing@opdv.ny.gov](mailto:DVSafeHousing@opdv.ny.gov) and [kelli.owens@opdv.ny.gov](mailto:kelli.owens@opdv.ny.gov)

**RE: Written Comments on NYS Financial Assistance Grants Appropriated in NYS FY '23-24 Budget**

Dear Ms. Owens,

The New York State Coalition Against Domestic Violence (NYSCADV) appreciates this opportunity to provide comments regarding the distribution of \$5 million in new state funding for financial assistance to victims and survivors of domestic violence.

It is well known that domestic violence (DV) impacts individuals regardless of socio-economic factors. Individuals experiencing DV also face unique challenges and barriers, placing many victims and survivors at a significant economic disadvantage. Even for those who are not previously considered low-income, abuse can cause them to fall into poverty by undermining their ability to work, remain in stable housing, or provide financially for themselves and their families.

Improving financial security for victims and families can be an effective strategy to help victims access housing, shelter, employment and other services that support healing and stability. NYSCADV appreciates New York State's acknowledgement of the importance of ensuring DV survivors' financial security and is optimistic that provision of financial assistance grants to New Yorkers experiencing domestic violence will enhance the safety of survivors and assist their stabilization and well-being.

That being said, flexible funding streams often come with strict requirements. For example, spending may be required within a certain timeframe, which can be challenging for service providers to accomplish in ways that support the financial stability of their programs. Funding may not be accessible to all survivors, based on certain limiting criteria or eligibility, or the use of funding may be limited (e.g., only intended for housing).

Building on resources developed by Futures Without Violence and the Washington State Coalition Against Domestic Violence, NYSCADV developed a Best Practice resource for DV agencies that were implementing or planning to initiate flexible funding programs.<sup>1</sup> This resource, published in July 2021, identified four core principles that should be incorporated into any flexible funding program:

1. **Low-barrier access for inclusion in the program** – the program must be easily accessible to meet a survivor's immediate needs and require little or no documentation to verify abuse. Funding decisions

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<sup>1</sup> Burke, K. and Murat, A. "Using Flexible Funding To Support Survivors: Top Considerations For Domestic Violence Service Providers" New York State Coalition Against Domestic Violence. July 2021.



should be informed by how effectively the financial assistance will directly or indirectly support the survivor's stability;

2. **Quick dissemination of funds** – the program should make funds available to survivors within 24-48 hours of a request whenever possible;
3. **Survivor-driven, trauma-informed advocacy** – the program should enable survivors to identify their own needs and the program should support those choices by assisting in the development of the survivor's identified goals through shared conversation and collaboration. The program should ensure availability of safety planning alongside the provision of flexible funding grants. And, financial assistance grants must be tailored to the individual, and include emotional or support counseling, systems navigation, help with employment access, immigration or civil legal advocacy, support for children; transportation access, etc.; and,
4. **Flexibility** – the program should utilize available funding to address barriers that exist for a survivor to achieve healing and stability.

The document also noted that when providing financial assistance to survivors, it is critical to consider what documents and information will be required and what protocols will be taken to safeguard the confidentiality of survivors' personally identifying information. When collecting information, consideration should be given to whether DV survivors and their dependents can be identified, if the data being collected and shared is actually necessary for service provision, who has authorized access to the information, where the information is stored, and how data is secured.

Any financial assistance program for DV survivors established by New York State must adhere to these four core principles.

During the past two years, New York State has used federal pandemic relief funds to support domestic violence services and, in some cases, direct financial assistance to DV survivors. This includes provision of Family Violence Prevention and Services Act (FVPSA) American Rescue Plan (ARP) supplemental grant funds distributed by the NYS Office of Children and Family Services (OCFS) in 2022; the 2021-2022 Housing Navigator Program/Safe Housing Options Grant funding distributed by the NYS Office of Victim Services (OVS) and the NYS Office for the Prevention of Domestic Violence (OPDV) in 2021; and Temporary Assistance for Needy Families (TANF) program, Pandemic Emergency Assistance Funds (PEAF) distributed by OPDV in 2022. NYSCADV has received feedback about these grant programs during numerous one-on-one conversations, group conference calls, workshops and listening sessions. The comments below are based on this feedback.

First and foremost, how should these funds be accessible to DV survivors? NYSCADV recommends that any available financial assistance funding flow from the state directly to DV service providers for distribution to DV survivors and their families. DV advocates are experts in survivor-centered and trauma-informed care. They are on the ground, as frontline, essential workers, providing support and assistance based on organizational mission and values. The best way to ensure financial assistance is provided quickly in a survivor-centered manner is by providing such funding to DV programs so survivors have immediate access when needed.

That being said, NYSCADV would like OPDV to consider whether it makes sense to require DV programs to execute a new contract with New York State for the provision of these financial assistance grants. As OPDV is well aware, DV programs are already required to enter into multiple contracts with New York; DV programs that receive(d) FVPSA, VAWA, VOCA, Enough is Enough, per diem reimbursement, funds to provide non-residential services, a housing options grant, or PEAFF are required to execute separate contracts with various New York State agencies, each with their own contract cycle, terms, state oversight, reporting and auditing requirements. Most DV programs operate under more than a dozen state and federal grants. In fact, some DV agencies simultaneously operate under more than 30 state and federal grants. Organizational administration of this many grants requires significant staff time and resources. For years, DV advocates have urged New York

State to simplify its onerous and burdensome contracting process to enable more staff time and resources to be focused on direct service provision to DV survivors and their families. Not only have these requests gone unanswered, but New York State seems to be digging in deeper, requiring DV agencies to execute more single-issue grants for relatively small pots of funding. We urge OPDV to work with other state agencies to identify a way to provide DV agencies with this grant funding without requiring a new contract, possibly by supplementing an existing contract. This was very effectively done by OCFS in its provision of the ARP supplemental FVPSA funds.

Regardless of how the financial assistance funds are provided to DV programs, it is critical that the funding is provided to each DV program at the outset, enabling immediate disbursement to DV survivors in need. New York State's current approach is to require DV agencies to initially pay for the costs of service provision, and then seek reimbursement later. Vouchering for such reimbursement is an onerous process with significant rules and restrictions associated with the process. Further, reimbursement typically takes several months to receive. The state should no longer place DV programs in a position where they must utilize lines of credit and other resources to provide services for New Yorkers.

In addition, the guidelines, application and other documentation, FAQs, reporting requirements and other details must be finalized and circulated before funds are granted. The information garnered by DV advocates about a DV survivor's experiences should be all that is needed for documentation purposes. In other words, DV survivors should not be required to provide their information repeatedly during multiple intakes, nor should DV advocates be required to maintain detailed records about a survivor's experiences for a survivor to obtain financial assistance.

With respect to the types of DV programs eligible to receive financial assistance funding for DV survivors, NYSCADV recommends OPDV rely on the same eligibility group as used for distribution of PEAFF, namely any domestic violence program that is licensed by OCFS, are VOCA or VAWA sub-grantees, or are a member of NYSCADV. We also suggest ensuring that only programs with a primary purpose of providing services to DV survivors be eligible.

Another recommendation made repeatedly by DV advocates is for New York State to ensure the institutional viability of domestic violence programs by providing foundational financial support to them, rather than requiring them to compete against each other for competitive grants. NYSCADV therefore requests these financial assistance grants be provided to DV programs non-competitively.

Distribution of funding to DV programs should be based on set criteria or a formula to ensure DV survivors have equal access to financial assistance grants regardless of zip code or the type of DV program they are working with. Nor should the criteria be based solely on the number of clients served by each program. Survivors in different communities have varying but equally relevant financial needs. Survivors' requests have become more complex and this must be reflected in the distribution of funds. NYSCADV and DV advocates would be happy to collaborate with OPDV as it develops the criteria for distribution of funds to DV programs.

DV programs must have administrative funds to manage and provide flexible funding to survivors. The state cannot expect nonprofits to provide services that are state funded without also having the state funds they need to coordinate those services. Permitting some percentage of available funds for DV program administration is also a matter of valuing the work of DV advocates. For many DV programs, administrative costs go beyond compiling and submitting paperwork. For them, it means additional work at intake and/or collection of additional information while simultaneously supporting the client as they navigate a crisis. We recognize state agencies typically are permitted to use funding dollars to support their program administration. The staff of DV programs will be as instrumental to the success of any flexible funding program as state agency staff and should be similarly funded.

NYSCADV also recommends the reporting requirements for the program be as simple as possible, requiring little paperwork and limited information regarding a survivor's eligibility for receipt of funds, or for the intended use of the funds (see more below). The State must be certain its program complies with federal provisions regarding the confidentiality of survivor's personally identifiable information and is not asking local DV programs to collect information on an individual survivor basis.

OPDV has informed the DV community that procurement for this program will occur this Fall. We urge New York State to allow a reasonable timeframe for DV programs to prepare for program implementation (e.g., finalize internal procedures and protocols, train staff, etc.) and provide sufficient time to expend available funding. As was learned with PEAFF, having a short timeframe for disbursement of funding causes significant administrative burdens, requires shifting of responsibilities within local agencies which negatively impacts other services, and does not ensure equitable distribution to all DV survivors.

New York State has not specified the particular uses or needs these financial assistance grants will cover. In order for this program to be truly survivor-centered and trauma-informed, and as this is not federal funding which typically comes with several conditions and requirements, we urge OPDV to ensure there are no criteria or eligibility requirements that survivors must meet to obtain this assistance. Financial assistance should be available to DV survivors regardless of gender, gender identity, sexual orientation, income level, marriage status, immigration status, parenting responsibility, criminal history or other factor or characteristic.

It is also imperative to ensure that no conditions be placed on a survivor's use of the financial assistance, or on a program's use of the funds on behalf of a survivor. As OPDV knows, DV survivors are fully capable of identifying their needs and how financial assistance can be best utilized to assist them with enhancing safety and stabilization. These needs may not comport with the State's or an advocate's views on what is "best" for the survivor. However, understanding the dynamics of power and control and how difficult it may be for survivors to exert their own agency, it is critical that systems and advocates trust the ability of survivors to self-determine. DV survivors deserve full autonomy to make the decisions that are best for them and their families. If the State only permits the financial assistance to be used for a narrow set of needs, no matter how justified it appears to New York State, certain survivors will be unable to access the assistance and funds will be inequitably dispersed.

DV advocates also request that DV programs are able to use financial assistance funding to permit a DV survivor to stay in shelter longer than 180 days (the maximum stay permitted under current statute), or to keep a bed open for a survivor or their dependent if they need to temporarily leave shelter. These steps are crucial to ensuring New York's shelter system is survivor-centered and trauma-informed.

The State should be responsible for broadly promoting the availability of financial assistance grants for DV survivors, rather than relying on DV programs to do so. Most local DV programs do not have communications staff, nor are they in a financial position to promote the program to a wide group of New Yorkers. For the program to be equitable and accessible to all DV survivors, even those not currently working with a primary purpose DV program, information must be available in multiple settings (e.g., DV shelters and program offices, DSS and other public benefits offices, healthcare facilities, police departments, attorney offices, etc.) in multiple languages using gender neutral terms.

Finally, as NYSCADV and DV advocates have communicated to New York State on multiple occasions for the past several years, the methodology for how New York funds DV services is antiquated and no longer sufficiently meets the needs of DV survivors and their families. While we appreciate this \$5 million appropriation for financial assistance grants for DV survivors and are confident it will assist some in their journey, we recognize that this level of funding is unlikely to benefit the lives or experiences of all New Yorkers experiencing domestic violence on a daily basis. As such, we recommend New York State include this appropriation in subsequent State Budgets to provide much needed sustainable funding, and that the level of available funding increases to better meet the needs of all DV survivors in the State. We also reiterate our interest in collaborating with New York

State to implement a new, innovative DV funding model that shifts resources from grant writing, per diem investigations and reporting, to DV service provision while minimizing bureaucracy, duplication and administrative burdens for DV programs.

Thank you for the opportunity to provide these insights and comments.

Sincerely,

A handwritten signature in blue ink that reads "Joan Gerhardt". The signature is written in a cursive style with a large initial 'J'.

Joan Gerhardt  
Director of Public Policy and Advocacy

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## Testimony of The Urban Resource Institute for the Office of Prevention of Domestic Violence's Flexible Funding Town Hall

*Thursday, July 13, 2023*

Thank you for the opportunity to address the significant economic barriers survivors of domestic and gender-based violence encounter on their path to safety and healing. Urban Resource Institute (URI) has been in operation for over 40 years and is the largest provider of domestic violence shelter services in the country. URI currently provides temporary housing and services to more than 2,200 people each night who have been impacted by domestic violence or who are experiencing homelessness and will continue to increase capacity over the next several years. URI is committed to developing and delivering innovative client-centered and trauma-informed services to individuals affected by domestic and gender-based violence and families experiencing homelessness.

URI would like to highlight the significant economic challenges survivors of domestic and gender-based violence encounter when trying to access programs providing financial assistance, which disproportionately affect BIPOC, LGBTQ+, and immigrant New Yorkers, perpetuating a cycle of poverty and limiting their options for safety and stability.

### **The Need for Economic Empowerment**

More than 98% of all survivors of domestic and gender-based violence report having experienced some level of economic abuse. These survivors further report that economic abuse is among the primary reasons that they stay in or return to a dangerous or abusive environment.

In line with our commitment to support survivors as they work to achieve safety and healing, in temporary, supportive or permanent housing, we must make more robust investments in economic empowerment services and ensure that providers have the funding flexibility to determine how best those economic empowerment resources should be allocated.

URI's Economic Empowerment Program (EEP) provides survivors with the tools, resources, and skills necessary to overcome economic obstacles and achieve long-term financial independence. The EEP provides credit counseling and advocacy, individualized support, resume writing, and interview skills workshops, and internships and externships placement to ensure survivors have the practical experience and further develop their marketable skills.

One hundred percent of our clients are homeless at intake, and 99% are experiencing poverty. Flexible funding for economic empowerment will enable URI and other providers to deepen our work with existing clients or expanding services to additional clients. The need for economic empowerment support has steadily increased among our existing clients. URI increased its service to clients by three times in the five year period from FY '18 and ending in FY '22. Including doubling capacity during the pandemic. Our staff has worked tirelessly to respond to the growing need, but even with their commitment, the program currently has a waitlist of approximately 80 people.

Funding flexibility would enable us to expand our services to meet the growing need among our clients, to support additional internship and externship placements and to provide direct financial assistance to survivors and their families, as needed.

### **The Need for Direct Cash Assistance**

In a recent survey conducted by [Free From](#), survivors consistently identified direct cash assistance as their most urgent need to achieve safety.

The success of past direct cash assistance programs highlights the value of providing financial support to survivors. In partnership with the Mayor's Office to End Domestic and Gender-Based Violence, in 2020 Sanctuary for Families administered a privately funded \$500,000 microgrant program. High need resulted in the funds' depletion within a mere two months. Survivors used the microgrants to cover essential items, such as technology, furniture, clothing, and more.

Notably, the program revealed crucial insights, such as agencies' limited capacity and infrastructure to purchase needed items for survivors. It also emphasized that survivors themselves possess the most comprehensive understanding of their unique needs and that providing funds directly to survivors is among the most impactful and efficient ways to support them.

In 2021, the federal government allocated \$1 billion to families in need through the Pandemic Emergency Assistance Fund (PEAF), administered by the New York State Office of Children and Family Services. Many domestic violence organizations in New York City successfully distributed these funds to survivors within six months. The PEAF funds were primarily allocated for emergency support related to rent or rental arrears, food, clothing, furniture, and utilities. The funds were directly provided to survivors without requiring receipts or proof.

However, the criteria for accessing funds were quite strict, and only included survivors with dependent children, inadvertently excluding a significant portion of survivors in need. Flexible funding for microgrants has proven to have a profound impact on survivors' ability to rebuild their lives, secure housing, and achieve financial stability. The rapid depletion of funds from the PEAF program underscores the overwhelming demand for low-barrier financial support of this nature.

Addressing the economic barriers faced by survivors of domestic and gender-based violence requires more robust and flexible funding. URI is committed to providing innovative services to individuals affected by violence and homelessness. The work of URI's Economic Empowerment Program is crucial for survivors to overcome challenges and achieve financial independence. With additional and enhanced funding flexibility, our EEP could enhance support, skills workshops, and internships. Direct cash assistance, like microgrants, is urgently needed to support survivors' immediate needs. Learning from past experiences, we should ensure inclusive criteria for financial assistance programs. By implementing these reforms and allocating flexible funding, we can empower survivors and create a future of safety, stability, and independence. Let us take bold steps towards economic equity and support survivors on their path to healing and recovery.

Thank you for your attention to this critical issue.