



June 3, 2009

MANAGEMENT ADVISORY MEMORANDUM FOR:

CATHERINE PIERCE
ACTING DIRECTOR
OFFICE ON VIOLENCE AGAINST WOMEN

FROM:


RAYMOND J. BEAUDET
ASSISTANT INSPECTOR GENERAL
FOR AUDIT

SUBJECT:

Interagency Coordination on Recovery Act
Transitional Housing Assistance Grants

This memorandum details an issue we identified as part of our ongoing audit of the Office on Violence Against Women's (OVW) management and implementation of \$225 million in funding authorized by the American Recovery and Reinvestment Act of 2009 (Recovery Act). The Recovery Act allocated \$50 million for grants awarded under OVW's Transitional Housing Assistance Program. The purpose of this grant program is to support transitional housing and related efforts offered by state, local, and tribal governments, as well as other non-profit organizations that assist victims of domestic and dating violence, sexual assault, or stalking.

Transitional housing focuses on helping those in need acquire a long-term and stable residence. The OVW's transitional housing program therefore supports shelters that serve victims of domestic violence or provides payments to victims for housing-related expenses like rent, utilities, or moving costs.

The OVW is not the only federal agency that manages such housing programs. Both the U.S. Department of Housing and Urban Development (HUD) and the U.S. Department of Health and Human Services (HHS) have programs with similar scopes and purposes. Recognizing the overlapping responsibilities and related goals among housing programs administered by these agencies, the statute authorizing OVW's transitional housing program requires the OVW to coordinate with HHS and HUD when making transitional

housing awards (42 U.S.C. § 13975 (2006)). Additionally, the Office of Management and Budget (OMB) has issued guidance encouraging executive agencies that receive Recovery Act funds for similar programs to consolidate resources used to administer their grant award processes.¹

Many organizations are eligible to receive funding from all three agencies to fund one or more of their programs. Therefore, interagency collaboration with HHS and HUD would allow OVW to identify grantees that: (1) did not use either HHS or HUD funds for allowable purposes, or (2) had inadequate program performance results. In addition, increased collaboration may allow OVW to take advantage of any transitional housing information acquired by HUD and HHS. Such information may enhance OVW capabilities to identify and evaluate the needs of the transitional housing community and its targeted populations, past grant recipient performance, and other best practices for handling applications and making awards.

OVW and HHS Transitional Housing Collaboration

The HHS's Administration for Children and Families (ACF) administers a Family Violence and Prevention Services program that provides formula awards to states and territories that disperse funds to specific emergency shelter programs. The ACF formula grant program receives up to \$175 million each fiscal year, more than three times the amount of transitional housing funds provided to OVW by the Recovery Act. While emergency shelters and transitional housing programs fund different activities, many of the organizations that apply for funding have programs that provide both transitional housing and emergency shelter. As a result, many of the same organizations eligible to receive OVW transitional housing grants are also eligible to receive HHS funding.

We met with OVW and HHS officials separately to discuss their interaction. OVW officials told us they communicate with HHS frequently. OVW and HHS are both part of a larger, multi-agency leadership group that deals with domestic violence issues. HHS officials said their coordination with OVW often focuses on what programs each office should fund to address their target population's wide variety of needs. HHS employees also confirmed that they periodically discuss transitional housing efforts with OVW employees. In addition, HHS and OVW have worked together to establish formal policies for their programs, such as grant participant confidentiality guidelines.

Although HHS and OVW work together to develop policies and program purpose areas, HHS officials said they do not share an official list of grant recipients because the OVW and HHS housing programs fund different types of support. For example, HHS funds programs that support the immediate

¹ OMB memorandum number M-09-15 (April 3, 2009).

housing needs of victims of domestic violence while OVW's program is focused on the long-term housing needs of those victims. However, officials from both agencies agreed that their programs may award funds to the same recipients as both emergency shelters and transitional housing programs are eligible to receive both OVW and HHS grants.

Without improving efforts to share award recipient information with HHS, OVW cannot readily identify the organizations that receive both OVW and HHS awards. Although HHS and OVW programs respectively fund different housing needs, recipients that receive both OVW transitional housing and HHS emergency shelter grants present a higher risk that grant funds may be misused. For example, an organization that received an award from HHS and OVW could use funds from both awards to pay for certain costs, such as overhead and general administrative costs. If the organization charged the same costs to both grants, it could effectively receive payment twice. Furthermore, if OVW could identify the organizations that received both HHS and OVW awards, either directly or through subgrants, OVW could use this information to enhance the oversight efforts and guidance of current recipients and enhance the selection of future recipients.

Therefore, we believe that OVW should work with HHS to identify grant recipients and subrecipients that receive both OVW transitional housing and HHS emergency shelter awards. Additionally, OVW could use this information to ascertain the performance of and identify the potentially most worthwhile recipients for its grant funds.

No Collaboration with HUD

While OVW and HHS collaborate in a number of different ways, OVW has not had any substantive collaboration with HUD regarding its transitional housing program. HUD officials we spoke to estimate that approximately \$900 million of their \$1 billion budget is allocated to housing for victims of domestic violence. The Recovery Act provided HUD's Office of Community Planning and Development (CPD) with \$1.5 billion for awards to state, local, and tribal governments through the Homelessness Prevention and Rapid Re-Housing program. CPD's Recovery Act awards may also fund emergency shelters and transitional housing initiatives that support victims of domestic violence. Because the OVW transitional housing program helps domestic violence victims residing in shelters and receiving services, recipients of CPD program funds may also apply for and receive OVW grants.

OVW officials told us that they have tried to contact HUD in the past, but they have not been able to obtain specific contact information necessary to begin substantive collaboration efforts. We are concerned by the lack of coordination between OVW and HUD because both agencies have ongoing programs that fund housing for victims of domestic violence. This lack of

coordination means that OVW can neither identify HUD grant recipients nor assess whether these recipients have achieved their HUD grant performance goals.

We discussed OVW's statutory requirement to collaborate with HUD on transitional housing grants with officials from HUD's Office of the Inspector General. These officials directed us to HUD's Office of Special Needs Assistance Programs (SNAP). We met with SNAP officials who stated that they would like to begin coordinating transitional housing program efforts with OVW. According to these officials, OVW coordination may also help them enhance domestic violence statistics reported in HUD's annual homelessness assessment report to Congress. Specific contact information for these HUD officials is included as an attachment to this memorandum. Therefore, we believe that OVW should contact these HUD officials to begin coordinating transitional housing award activities to mitigate duplicative awards and identify problematic grantees. In addition, we suggest that OVW consider coordinating with HUD future monitoring and oversight activities of grantees receiving funding from both programs.



To improve collaborative efforts, OVW should initiate sharing lists of transitional housing award recipients with HHS and HUD. If OVW can acquire HHS and HUD information, OVW could then accurately map the grant award landscape to identify duplicative awards and those organizations most in need of domestic violence transitional housing support. OVW should also request and share qualitative data about grant recipient performance to enhance future grant monitoring activities and identify high-risk grant recipients.

Please advise us of the actions you intend to take regarding issues discussed in this memorandum within 30 days. If you would like to discuss the information in this memorandum, you may contact me on (202) 616-4633 or Troy M. Meyer, Regional Audit Manager, Washington Regional Audit Office, on (202) 616-4688.

Attachment

cc: Rodney D. Samuels
Audit Liaison
Office on Violence Against Women



U.S. Department of Justice

Office on Violence Against Women

Washington, D.C. 20530

July 13, 2009

MEMORANDUM

TO: Raymond J. Beaudet
Assistant Inspector General for Audit
Office of the Inspector General

FROM: Catherine Pierce 
Acting Director
Office on Violence Against Women

SUBJECT: Interagency Coordination on Recovery Act
Transitional Housing Assistance Grants

This memorandum responds to your Management Advisory Memorandum, dated June 3, 2009, Interagency Coordination on Recovery Act Transitional Housing Assistance Grants. The Office on Violence Against Women (OVW) concurs with the recommendations contained in the memorandum and greatly appreciates the contact information provided for key officials at the United States Department of Housing and Urban Development (HUD).

OVW is proud to support the implementation of the American Reinvestment and Recovery Act (ARRA) and is committed to working with other federal agencies to coordinate programs, policies, and initiatives designed to enhance the Federal government's response to violence against women. As your memorandum notes, OVW has a history of strong collaboration with the United States Department of Health & Human Services (HHS), and in particular, the Administration for Children and Families (ACF). OVW agrees that this collaboration could be further strengthened through the confidential sharing of grant lists and other related information to be used for both the pre-award deliberative process and post-award monitoring purposes. OVW also acknowledges that it has been unsuccessful in developing a comparable relationship with any division or agency within HUD, until now.

On June 5, 2009, OVW staff contacted Ms. Lara Routt, the Director of the State Assistance Division of the Office of Special Needs Assistance Programs (SNAP) at HUD. This was in direct response to the information provided in your Management Advisory Memorandum. Ms. Routt identified herself as the designated point of contact for collaborative efforts with OVW. After an initial conversation, OVW staff agreed to send Ms. Routt a chart containing a list of all

Recovery Act Transitional Housing applicants by State, applicant type, risk category assigned to each award by OVW, and the amount of funding recommended. A copy of the chart and related email are attached. Ms. Routh indicated that they were preparing a similar list of grants for the Department of Justice Office of the Inspector General and would provide OVW with a copy when completed. OVW has not yet received this information. OVW is also awaiting feedback on our Recovery Act Transitional Housing-recommended applications from the SNAP, but we are in the process of setting up an initial meeting between the two offices to further discuss ways that we can collaborate regarding both on the Transitional Housing Assistance Grant Program specifically, and more broadly on the overarching issues of violence against women, homelessness, and housing. This meeting will likely take place before the end of July 2009.

In addition, on June 6, 2009, OVW staff contacted the director of the Family Violence Prevention & Services Program, Family and Youth Services Bureau, Administration for Children and Families in HHS, offered to provide a list of the recommended Recovery Act Transitional Housing Grantees, and discussed the benefits of sharing this information in the future. A follow-up email that accompanied the recommendation list is attached.

OVW shares your interest in enhancing the quality of our collaborative efforts with our partners at HUD and HHS. We appreciate the opportunity to review and comment on this Management Advisory Memorandum, and we particularly appreciate your help facilitating our collaboration with the Office of Special Needs Assistance Program in HUD. If you have any questions or require additional information, please contact Rodney Samuels of my staff at (202) 514-9820.

cc: Richard P. Theis
Assistant Director
Audit Liaison Group
Justice Management Division

Troy Meyer
Regional Audit Manager
Washington Regional Audit Office

Susan Williams
Associate Director
Office on Violence Against Women

Kotora Padgett
Finance Officer
Office on Violence Against Women