



**Comments of the National Center for Victims of Crime
Regarding the Office on Victims of Crime (OVC), the Office on Violence Against
Women (OVW), and the Community Oriented Policing Services (COPS) Office**

Multi-agency Recommendations

1. All bureaus should ensure that every grantee meets high performance standards.
2. OVC and OVW can play an important role in educating policy makers about issues critically important to victims. They should embrace this role. Producing model legislation or offering policy guidance is essential to the mission of improving the national response to victims.
3. Program priorities of the bureaus should reflect current research highlighting existing needs and promising practices. In addition, OVC, OVW, and COPS should identify the research needs of their fields and work with the National Institute of Justice (NIJ) and other research agencies to meet those needs and disseminate research results in a user-friendly format to their constituencies. Such research results should routinely include implications for policy and practice.



Comments of the National Center for Victims of Crime Office for Victims of Crime (OVC)

1. The Department of Justice and OVC must protect and increase VOCA Funding.

Given the nationwide funding crisis in victim services nationwide and the steadily increasing amounts collected into the Victims of Crime Act (VOCA) Fund, the continuing cap and recent reduction in VOCA funding are unconscionable and constitute a violation by the Department of the spirit and purpose of the Victims of Crime Act. DOJ and OVC must be public defenders and champions of this Fund, and funding levels must increase.

2. The VOCA Guidelines should be updated.

The most recent update of the VOCA Assistance Guidelines was aborted after publication of the proposed new guidelines and receipt of public comments in 2002. The given reason was that the Department of Justice planned to convert the guidelines to regulations and the process would begin anew. It hasn't, and updating the 1996 guidelines for VOCA Assistance Funding is long overdue. The Compensation Guidelines, last revised in 2001, should be updated as well to include new crimes and to reflect increased recognition of victim needs.

3. Increased access to information about current and recent OVC grant projects.

Information about current and recent OVC-funded projects has not been readily available. OVC's biannual "Report to the Nation" includes a "Focus On" series of topic-specific descriptions of projects and links to products. This "Focus" feature should become a standard feature on the Web site that is updated regularly, not merely at the time of the congressionally-mandated reports. In addition, OVC should consider creating a dissemination vehicle such as the NIJ Journal, which summarizes current research projects. OVC should report not only on products developed but also on lessons learned and in a timely manner.

4. OVC should limit its discretionary funding to projects with national scope.

OVC's discretionary dollars should be spent where they will have the greatest impact: on demonstration projects that can inform the national response to victims, as well as national-scope training and technical assistance projects. In recent years, OVC has often become an alternate grantor for small grants to nonprofits rather than funding projects with a wider scope. Acting as a funder for small dollar grants is an inefficient use of staff time and diverts funding from needed projects that can have a national impact. Moreover, the role of funding small grants to nonprofits should be left to state VOCA assistance administrators, who are in the best position to understand the need for funding across their states.



5. OVC should recognize civil justice as an option for victims of crime.

In recent years, OVC has shied away from any mention of civil justice as an option for victims of crime. This position does a disservice to victims, who often cannot receive complete satisfaction through the criminal justice system. OVC should promote training and resources on civil remedies for crime victims so that victims, advocates and other criminal justice professionals can understand when civil remedies may be an appropriate option either in addition to, or in lieu of, a criminal prosecution or restitution order.

6. OVC should develop a scheme for long-term funding of projects that provide widespread support for victim assistance.

Many of OVC's projects (e.g., state victim assistance academies, the victims' rights database *VictimLaw*, and victims' rights legal clinics) provide a long-term benefit to the victim services field. As long as they meet high performance standards, such programs are worthy of sustained support.

At the state level, some VOCA administrators end grants to organizations after several years in order to fund new programs. This practice may undercut the development of a sustained network of services throughout a state. OVC should encourage VOCA administrators to develop a balanced approach to sustaining effective programs and funding innovative new approaches to victim services.

7. During the next few years, OVC should increase its attention to the needs of teen victims and elder victims.

Teens are victimized at higher rates than other age groups for broad categories of crime, yet our criminal justice and victim service systems often fail to meet their needs. Given the disproportionate impact of crime on teen victims and the links between crime and substance abuse, reduced education and employment, and mental health problems, such an inadequate response has broad implications for society. OVC should increase its attention to projects that improve our response to teen victims.

At the same time, the problem of elder abuse and financial exploitation is on the rise, as an increasing percentage of our population enters its elder years. OVC should increase its work in the area of elder victimization as well.

8. OVC should increase its attention to federal victim assistance.

Crime victim assistance is becoming integral to the federal justice system. OVC should increase its attention to these services, reinstating its federal victim assistance conference and providing technical assistance and funding to agencies with critical unmet needs. In addition, OVC should publicly release its Best Efforts Report, which documents the provision of victim services within the Department of Justice. Such dissemination will raise awareness of the efforts to help federal victims of crime as well as the existing disparities among those efforts.



Comments of the National Center for Victims of Crime Office on Violence Against Women (OVW)

1. OVW should better diversify its efforts across the issues of stalking, domestic violence, dating violence, and sexual assault.

OVW should continue to pursue a more equitable distribution of efforts across the range of issues within its purview: stalking, domestic violence, dating violence, and sexual assault. Its Sexual Assault Working Group has been an effective vehicle to promote a focus on this important issue. OVW should consider a similar practice for dating violence and stalking.

In addition, any new director of OVW should have broad understanding and experience in addressing all these issues.

2. OVW should make better use of its National Advisory Committee.

OVW is fortunate to have a National Advisory Committee. The NAC represents a range of experts from the field on sexual assault, domestic violence, stalking, and dating violence. OVW should take better advantage of this group and seek its input on OVW products, guidance documents, and policy matters. In addition, no NAC was in place during 2008. A new membership should be appointed as soon as possible.

3. OVW should continue to promote collaboration in its grants and within the office.

One of OVW's strengths has been its promotion of collaboration among victim service providers and the criminal justice system. Such collaboration improves outcomes for victims. OVW has also promoted collaboration and communication within the office: the sexual assault working group (SWAG) provides one example. Not only does the SWAG promote internal and external attention to the issue of sexual assault, it also permits the regular exchange of information and ideas to improve the response to sexual assault victims. OVW should consider replicating this group for other issues.

Internal collaboration, however, must not come at the expense of clear authority within the office to approve grants and grant implementation. As with any collaboration, it must not itself become a barrier to efficiency.

4. OVW should continue to promote the integration of stalking and sexual assault into the grant programs recently expanded to include those issues.

VAWA 2005 expanded the scope of several grant programs (including the Grants to Encourage Arrests and Enforcement of Protection Orders program and the Rural Domestic Violence, Dating Violence, Sexual Assault, Stalking, and Child Abuse Enforcement Assistance Program) to include sexual assault and stalking, OVW must work to ensure that sexual assault and stalking are meaningfully addressed by grantees of



these programs. OVW can ensure that Requests for Proposals clearly solicit applications addressing sexual assault and stalking and that the grant review process includes experts in these crimes.

5. OVW should continue to fully implement SASP.

The Sexual Assault Services Program is a vital program for the sexual assault field. It provides an opportunity to support rape crisis centers and other agencies that have been long struggling with lack of funding. OVW should continue to implement the program with the input of experts in the sexual assault field to ensure the funds are granted to programs providing direct services to victims of sexual assault, regardless of their involvement with the criminal justice system. Also, fully implementing SASP requires creating new services and supporting existing programs in communities of color and tribal areas.



**Comments of the National Center for Victims of Crime
Office of Community Oriented Policing Services (COPS)**

In light of the current fiscal crisis facing cities and police departments, hiring grants are not a good use of federal dollars. Most jurisdictions are unable to meet the matching requirements.

Instead, COPS should focus on innovations in community policing, forging effective partnerships (e.g., with victim service providers), and the effective use of technology, including forensics.