



Advocates  
Against  
Family Violence



**WORKING TO ELIMINATE  
VIOLENCE AND ABUSE IN  
THE LIVES OF ALL  
INDIVIDUALS.**

Kim Deugan, Executive Director  
Tricia Lofton, Operations Director

P. O. Box 1496  
Caldwell, Idaho 83605  
Office: 208.459.6330  
Fax: 208.454.6595  
www.aafvhope.org  
Email: info@aafvhope.org

August 8, 2022

Idaho Legislative Services Office  
P.O. Box 83720  
Boise, ID 83720-0054

To Whom It May Concern:

We are writing to express our support for the proposed administrative rules in IDAPA 15.05.04, which relate to grants administered by the Idaho Council on Domestic Violence and Victim Assistance (ICDVVA). Our program has been providing services to victims of domestic abuse, sexual assault, child abuse, and human trafficking in the Treasure Valley for 19 years and we are a very large stakeholder in this.

We were engaged in the negotiated rulemaking process and are in full support of the changes. We attended all rulemaking sessions and voted on the proposed models for funding distribution.

At AAFV, we believe the proposed rules will provide for the necessary changes in the current method of limited funding for victim service providers throughout the State. It is critical to take into account the need for services and this is not addressed in the current rules, which only consider population and geographic areas. Because we are one of the largest providers of services throughout the State, we believe funding needs to be distributed in ways that directly benefit victims, and AAFV is confident the proposed rules will accomplish this better than the current rules.

Throughout 2021 AAFV's programs provided services to 14,607 individuals. We currently receive funding from ICDVVA through VOCA, State Bridge, FVPSA, State DV, Family Violence-SA, and Family Violence-TVMH. Without this current funding stream, we would not be able to continue providing the services and programs needed within our area.

In addition, we are in support of the rule changes to revise Idaho Code Section 39-5212 regarding priority of distribution to State domestic violence project grants. Need and demand should be taken into consideration for these funds, not simply the region in which marriage licenses were issued. Because these funds are the ONLY State funds for victim services in Idaho, specific to domestic violence programs, we support a revision to the code for the same reasons we support the administrative rule changes.

Please let us know if you have any questions or concerns. You may contact me at (208) 459-6330, Ext. 110.

Respectfully,

Kimberly Deugan  
Executive Director

**From:** [Slobodanka Hodzic](#)  
**To:** [DHWRules Mailbox](#)  
**Cc:** [info@icdv.idaho.gov](mailto:info@icdv.idaho.gov)  
**Subject:** Support The Administrative Rule, IDAPA 16.05.04 Changes [EXTERNAL EMAIL]  
**Date:** Wednesday, August 3, 2022 11:29:21 AM  
**Attachments:** [image006.png](#)

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Hello,

The Agency for New Americans (ANA), A program of Jannus Inc. supports the new administrative rule changes which will allow improved distribution of funding to programs. Furthermore we appreciate the opportunity to participate in the discussions to create the proposed changes and for ICDVVA transparency during the whole process.

Sincerely,

*Slobodanka Hodzic*  
*Program Director*  
*Agency for New Americans*  
*208-955-0160*  
[shodzic@jannus.org](mailto:shodzic@jannus.org) | <http://www.anaidaho.org/>  
Share your [feedback](#)!



409 Washington Avenue  
Pocatello, ID 83201  
Phone: 208-234-2646  
Fax: 208-232-0035

*"Working Together for Our Children"*

August 4, 2022

Tamara,

My name is Whitney Harris and I am the Clinical and Financial Director of Bright Tomorrows Child Advocacy Center in Pocatello. Our program provides both forensic interviews and counseling services for children who have been impacted by child sexual abuse. We are a non-profit organization, and a significant part of our funding comes from a VOCA grant through the Idaho Council on Domestic Violence and Victim Assistance (ICDVVA). Without this funding, it would be difficult if not impossible for our program to provide these important and necessary services in Southeastern Idaho.

I wanted to write this letter in support of the changes to the administrative rules to IDAPA 16.05.04 that ICDVVA will be proposing to the legislature. The team at ICDVVA has been incredibly thoughtful in putting this proposal together. In the past year, I had the opportunity to attend and participate in multiple meetings hosted by ICDVVA for all grant funded programs. These meetings were facilitated to ensure that programs like mine had opportunities to discuss issues related to the grants administered by ICDVVA, provide input and votes, and ultimately be represented in the proposal that the Council has prepared relating to changes in the IDAPA rules. I can attest that these meetings were well attended by funded programs, and that there was a great deal of involvement and collaboration among us.

Our program has been funded by ICDVVA for many years, and I have been the grant manager since 2017. During these years, I have seen many positive changes in how the grant administration has been handled by the Council. The current Executive Director, along with the staff at ICDVVA have worked tirelessly to improve the grant application and reporting process, to be transparent about funding, to prepare programs for upcoming cuts in funding, to ensure programs are following rules set forth by their grants, and to provide opportunities for programs to collaborate and work together to come up with strategic ideas so that victim services can continue to be provided throughout the state of Idaho. I state this to express my confidence in both the Council, and in the proposal that they are making, and to again offer Bright Tomorrows' support of the proposal. The changes ICDVVA will be presenting will improve the Council's ability to continue to support and sustain victim services programs throughout Idaho.

I would like to thank you and those you work with for your thoughtful consideration in this matter, and would be happy to discuss it further if that would be helpful. You may contact me by phone or at [whitney@brightcac.org](mailto:whitney@brightcac.org).

Best regards,

Whitney Harris, LCPC  
Clinical and Financial Director  
Bright Tomorrows Child Advocacy Center

**From:** [Emily Bilcher](#)  
**To:** [DHWRules Mailbox](#)  
**Cc:** [info@icdv.idaho.gov](mailto:info@icdv.idaho.gov)  
**Subject:** Administrative Rules Change - letter of support [EXTERNAL EMAIL]  
**Date:** Wednesday, August 24, 2022 3:24:01 PM  
**Attachments:** [image001.png](#)

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To Ms. Tamara Prisock, Administrative Rules Unit:

I am writing to express my support for the proposed administrative rules in IDAPA 15.05.04, relating to grants administered by the Idaho Council on Domestic Violence and Victim Assistance (ICDVVA). I consider Family Safety Network a stakeholder because we are a program that has been providing assistance to victims for over 27 years in Idaho and are invested in access to services. Our mission statement is, *"Advocating healthy relationships while empowering survivors of domestic and sexual violence in Teton Valley. We envision a world where individuals, families, and communities thrive in collective safety and wholeness."*

I am engaged in the negotiated rulemaking process and support the proposed changes. I attended two negotiated rulemaking sessions, spoke with fellow directors in my region about the process and voted on various proposed models for funding distribution. Concerns and questions I had were addressed and I was impressed with the transparency and diligence of the council members throughout the process.

I believe the proposed rules represent a necessary change in our method of distributing limited funding for victim services around the state. It is vital to take into account the need for services and that is not in the current rules, which merely consider population and geographic area. Idaho needs to be able to distribute victim service funds in ways that directly benefit victims, and Family Safety Network is confident that the proposed rules accomplish that better than the current rules.

Our program receives funds from ICDVVA from VOCA, FVPSA, and State DV. In addition to supporting the rule changes, we support any efforts of ICDVVA to revise Idaho Code Section 39-5212 regarding priority distribution of state domestic violence project grants. Need and demand should be taken into account with these funds as well, not simply the region in which marriage licenses were issued. Since these funds are the only state funds for victim services in Idaho, and specific to domestic violence programs, we support a revision to the code for the same reasons we support the revisions to the administrative rule changes.

If you have any questions, please feel free to contact me at [ebilcher@familysafetynetwork.info](mailto:ebilcher@familysafetynetwork.info) or (208) 354-8057.

Kind Regards,



Emily Bilcher  
Executive Director  
Family Safety Network  
PO Box 302  
120 N First East  
Driggs, Idaho 83422  
(208) 354-8057  
[www.familysafetynetwork.info](http://www.familysafetynetwork.info)

Our Mission

Advocating healthy relationships while empowering survivors of domestic and sexual violence in



August 15, 2022

Tamara Prisock DHW – Administrative Rules Unit  
450 W. State Street – 10th Floor  
P.O. Box 83720  
Boise, ID 83720-0036

Re: Proposed ICDVVA Administrative Rule

The Idaho Anti-Trafficking Coalition is writing to support the proposed administrative rules in IDAPA 15.05.04, relating to grants administered by the Idaho Council on Domestic Violence and Victim Assistance (ICDVVA). Our organization has been providing statewide services to victims and survivors of human trafficking for four years, who are exposed to crime and require immediate assistance. Our program receives funds from ICDVVA from VOCA, FVPSA, and State DV, and ensures victims have access to a 24/7 crisis hotline for support, advocacy, counseling, and help to navigate the complex criminal justice system and provide systems of care.

The Idaho Anti-Trafficking Coalition is engaged in the negotiated rulemaking process and supports the proposed changes by attending meetings, and reviewing recommended funding plans, data, and session summaries. We believe the proposed rules represent a necessary change to the method of distributing limited funding for victim services around the state. Idaho needs to be able to distribute these critical victim service funds across the state in ways that directly benefit victims and their families, filling in regional service gaps, and reallocating funds to other programs when necessary. As a victim service provider, we are confident that the proposed rules accomplish that better than the current rules.

In addition to supporting the rule changes, we support any efforts of ICDVVA to revise Idaho Code Section 39-5212 regarding the priority distribution of state domestic violence project grants. Need and demand should be considered with these funds as well, especially in communities with less access to healing services and avenues for justice, not simply the region in which marriage licenses were issued. The State DV funds are the only source of funds for victim services in Idaho and are specific to domestic violence programs. We support a revision to the code for the same reasons we support the revisions to the administrative rule changes.

If you have any questions please feel free to contact Jennifer Zielinski at 208-630-6601.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Zielinski".

Jennifer Zielinski  
Executive Director  
Idaho Anti-Trafficking Coalition

711 W. Franklin St.  
Boise, ID 83702  
208-630-6601  
Info@idahoatc.org



## **PARTNER AGENCIES**

AAFV-Hope's Door  
Achieving Wellness  
Advanced Clinical Trauma Services  
Area 3 Senior Services Agency,  
Adult Protection Services  
Andrea Torrez, MA, LCSW  
Boise State University  
Caldwell Police Department  
Canyon County Prosecuting  
Attorney's Office  
Canyon County Sheriff's Office  
City of Nampa  
Community Council of Idaho  
Community Outreach Behavioral Services  
Crime Victims Compensation Program  
Deseret Industries - Nampa  
Idaho Anti-Trafficking Coalition  
Family Medicine Residency of Idaho  
Idaho Department of Correction District  
Three Probation & Parole  
Idaho Department of Health & Welfare  
Child Protection Services  
Idaho Legal Aid Services  
Love INC  
Mountain Home Air Force Base  
Nampa Police Department  
North Point Recovery  
Northwest Nazarene University  
Refuge Counseling  
Rose Advocates  
Revitalize Counseling  
SAFE Program  
St. Alphonsus Medical Center-Nampa  
St. Luke's CARES Program  
Strive Counseling  
Valley Women & Children's Shelter- Nampa  
West Valley Medical Center

August 10, 2022

ICDVVA  
PO Box 83720  
Boise, Idaho 83720-0036

RE: Proposed administrative rules in IDAPA 15.05.04

Dear Sir/Madam:

The Nampa Family Justice Center submits this letter of support for the proposed administrative rules in IDAPA 15.05.04, relating to grants administered by the Idaho Council on Domestic Violence and Victim Assistance (ICDVVA). Our program provides assistance to victims and has been funded by the ICDVVA for over six years. We have received VOCA, FVPSA, FVPSA ARPA, and FVPSA TVMH/SA funding from ICDVVA. In the past 12 months we have served just under 1700 adult and children victims through our center and close to 1400 individuals at the courthouse. Some of the services we offer are advocacy including court advocacy, case management, safety planning, crisis intervention, counseling, etc. Since our inception in 2005, we are committed to victim services and meeting victim's where they are at, whether in crisis or working towards self-sufficiency or healing. Without this grant funding our program would not have been able to thrive and be successful.

The Nampa Family Justice Center has been engaged in all the negotiated rulemaking sessions and voted on various proposed models because we recognize the importance of these proposed changes and the impact they can have on victims we serve. We readily gave feedback to ICDVVA and felt all our questions and concerns were adequately addressed. We appreciated the transparency of the ICDVVA and their willingness to adjust changes based on the majority. Being newer to this role as Executive Director it was extremely helpful to understand the process and constraints of the ICDVVA in funding programs.

The Nampa Family Justice Center and our management team do believe the proposed rules represent a necessary change in the current method of distributing limited funding for victim services around the state. Idaho needs to be able to distribute victim service funds in ways that directly benefit victims, and our program is confident that the proposed rules will accomplish that better than the current rules.



ACCREDITED

*Where Families come First! And Professionals Come Together*

In addition to supporting the rule changes, we support any efforts of ICDVVA to revise Idaho Code Section 39-5212 regarding priority distribution of state domestic violence project grants. Need and demand should be taken into account with these funds as well, not simply the region in which marriage licenses were issued. Since these funds are the only state funds for victim services in Idaho, and specific to domestic violence programs, we support a revision to the code for the same reasons we support the revisions to the administrative rule changes.

If you have any questions please feel free to contact me at 208-606-6548 or by email at [strohmejerj@cityofnampa.us](mailto:strohmejerj@cityofnampa.us).

Sincerely,

A handwritten signature in cursive script that reads "Jeannie Strohmeyer". The signature is written in black ink and is positioned above the printed name and title.

Jeannie Strohmeyer  
Executive Director

August 9, 2022

To Whom It May Concern:

Having worked in the field of domestic violence victim services, in the state of Idaho, for over twelve years I would like to strongly express my support for the proposed administrative rules in IDAPA 15.05.04, regarding the administration of grant funding by the Idaho Council on Domestic Violence and Victim Assistance (ICDVVA). The agency I work for has been the recipient of ICDVVA funding for nearly twenty years. This funding has been invaluable in sustaining our rural agency, allowing for the fulfillment of our mission to provide human-centric core victim services in our community.

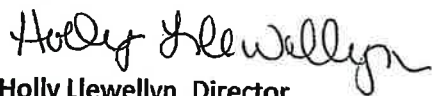
I had the privilege of participating in the rulemaking process. My questions were answered and I was afforded the opportunity to provide feedback. I believe that the finished product was developed fairly and without bias, giving all participants an opportunity to voice questions and or concerns.

It is my perception that the proposed rules represent a necessary change in the distribution of ICDVVA funding. Through the years our state and the agencies, that provide much needed services to individuals whose lives have been impacted by violence, have undergone a transformation. The proposed administrative rule changes will provide the needed changes to adapt and accommodate, permitting all agencies throughout the state to have appropriate access to funding, distributed fair and equitably.

Our agency has been very fortunate to receive VOCA and FVPSA funding, for which we are very grateful to ICDVVA for the professional matter which they administrate these funding sources. For several years we have chosen not to pursue State DV funds, as the distribution that we qualified for, under current code, was very small and we thought that our larger sister agencies could utilize the funds. For this purpose, I would also like to voice my support in the efforts of ICDVVA to revise Idaho Code Section 39-5212 regarding priority distribution of state domestic violence project grants. These are the only state funds for victim services in Idaho and our agency would greatly benefit having the current rules being revised, increasing the possibility of our agency qualifying for a larger distribution.

Please don't hesitate to reach out to me with any questions or need for clarification.

Respectfully,



Holly Llewellyn, Director  
Oneida Crisis Center  
Malad, Idaho  
[hollyl@atcnet.net](mailto:hollyl@atcnet.net)  
661 713-2226





# Family Resource Centers of Southwest Idaho

P.O. Box 527  
Weiser, ID 83672

Engaging Communities - Inspiring Change - Transforming Lives



08/11/2022

24 Hr. Crisis Line  
208 414-0740  
Fax: 208 414-4151

**Tamara Prisock**  
**DHW-Administrative Rules Unit**  
**450 West State Street-10th. Floor**  
**P. O. Box 83720**  
**Boise, Idaho 83720-0036**

Outreach Offices

**Weiser**

27 W Commercial  
Weiser, ID 83672  
204 414-1231

**Payette**

1520 1st Ave. S.  
Payette, ID 83661  
.208 642-1025

**Council**

204 Council Avenue  
Council, ID 83612  
208 253-4949

**Cascade**

211 Idaho Street  
Cascade, ID 83611  
208 382-5310

**McCall**

106 Park Street #204  
McCall, ID 83638  
208 630-6321

**Emmett**

126 N. Washington St.  
Emmett, ID. 83617  
208 365-1615

**Maple Tree House**

Payette, ID 83661  
208 642-1025

ROSE Advocates is writing this letter to express our support for the proposed administrative rules in IDAPA 15.05.04 relating to grants administered by the Idaho Council on Domestic Violence and Victim Assistance. (ICDVVA). As a grassroots rural outreach agency serving victims of domestic violence and/or sexual assault we absolutely consider ourselves as a stakeholder in this process. This agency is currently and has been funded by ICDVVA for 25 years. ROSE Advocates is greatly invested in providing services to but not limited to, the six rural counties (Adams, Boise, Gem, Payette, Valley, Washington) where there are extremely limited victim services and no public transportation to help reach out of area services.

We are engaged in the negotiated rulemaking process by attending, participating, and voting on various proposed models in the rulemaking sessions that resulted in the proposed rules. How to improve the current method of distributing funds for victims service throughout Idaho to include widespread rural communities with lower populations and area but with a great need for victim services was a real concern.

We believe the proposed rules represent a necessary change in our method of distributing limited funding for victim services around the state. We agree that it is vital to take into account the need for services and that is not in the current rules, which only consider population and geographic area. Many small rural communities fear the loss of services due to lack of funding. Idaho needs to be able to distribute victim service funds in ways that directly benefit victims in each community and ROSE Advocates is confident that the proposed rules accomplish that better than the current rules.

Our program receives funds from ICDVVA from VOCA, FVPSA, and STATE DV. In addition to supporting the rule changes, we support any efforts of ICDVVA to revise the Idaho Code Section 39-5212 regarding priority distribution of state domestic violence project grants. Need and demand should be taken into account with these funds as well, not simply the region in which marriage licenses were issued, With these funds being the only state funds for victim services in Idaho, and specific to domestic violence programs, we support a revision to the code for the same reasons we support the revisions to the administrative rule changes.

If you have any questions please feel free to contact me at [outreach@ruralnetwork.net](mailto:outreach@ruralnetwork.net).

*Dolores Larsen*

**Dolores Larsen**  
**Executive Director**  
**ROSE Advocates**  
**27 West Commercial**  
**Weiser, Idaho 83672**



Dear Ms. Prisock, DHW – Administrative Rules Unit;

I am writing to express my support for the proposed administrative rules in IDAPA 15.05.04, relating to grants administered by the Idaho Council on Domestic Violence and Victim Assistance (ICDVVA). The St Luke's CARES (Children at Risk Evaluation Services) clinic is a nationally-accredited hospital-based child advocacy center. We provide medical, forensic and advocacy support services to children who are victims of abuse, neglect, exposure to violence and all other forms of child maltreatment. Our clinic locations in the Treasure Valley and the Magic Valley served over 2,000 children in 2021.

We consider ourselves stakeholders in the proposed administrative rule changes because our clinic locations have been the recipients of ICDVVA VOCA and FVP funding for many years. This critical funding has allowed us to provide essential trauma-informed non-billable direct care services, to maintain and expand our staffing levels over the years to better serve the needs of our growing communities, to ensure our clinicians and providers have access to the most current trainings and evidence-based research and tools, and to support family violence prevention through direct care services and prevention programs.

Additionally, in 2020, our CARES Treasure Valley program applied for, and was awarded, VOCA funding specifically to purchase and retrofit a mobile child advocacy unit that can bring critical child abuse services directly out to rural counties that struggle with access barriers. Another accredited child advocacy center in eastern Idaho was also awarded funding for the same purpose. This innovative solution to bringing direct care services to rural communities was the direct result of a strong and solution-minded relationship between ICDVVA and the child advocacy centers in the state.

ICDVVA works hard to build similarly strong relationships with each of their funded programs in the state, and that was hugely apparent in their process for drafting the new proposed administrative rules. ICDVVA invited a high level of participation from their funded programs in the process, provided visibility to each version of the drafted changes, and regularly asked for feedback and questions/concerns. I personally attended 4 separate negotiated rule-making sessions that ICDVVA hosted and had a voice every step of the way regarding the proposed changes.

I strongly believe the proposed rules represent a necessary change in our method of distributing limited funding for victim services around the state. It is vital to take into account the need for services and that is not in the current rules, which merely consider population and geographic area. Idaho needs to be able to distribute victim service funds in ways that directly benefit victims, as shown through data provided to ICDVVA by the various programs in the state. I am confident that the proposed rules accomplish that better than the current rules.

In addition to supporting the rule changes, we support any efforts of ICDVVA to revise Idaho Code Section 39-5212 regarding priority distribution of state domestic violence project grants. Need and demand should be taken into account with these funds as well, not simply the region in which marriage licenses were issued. Since these funds are the only state funds for victim services in Idaho, and specific

to domestic violence programs, we support a revision to the code for the same reasons we support the revisions to the administrative rule changes.

If you have any questions please feel free to contact me at [kaczmarek@slhs.org](mailto:kaczmarek@slhs.org) or #208-577-4464.

Sincerely,

Molly Kaczmarek

Practice Manager, St Luke's CARES Clinics

RECEIVED

AUG 23 2022

HEALTH AND WELFARE DEPARTMENT  
OFFICE OF THE DIRECTOR



August 15, 2022

Tamara Prisock DHW – Administrative Rules Unit  
450 W. State Street – 10th Floor  
P.O. Box 83720  
Boise, ID 83720-0036

**RE: Rule Change Comments**

Ms. Prisock:

I am writing to express our support for the proposed administrative rules in IDAPA 15.05.04, relating to grants administered by the Idaho Council on Domestic Violence and Victim Assistance (ICDVVA). We consider ourselves a stakeholder as a recipient of ICDVVA funding for many years. This funding ensures that patients who have been a victim of sexual trauma who are uninsured or underinsured do not accrue a bill for any counseling they receive at Terry Reilly Health Services. Without this funding, patients may otherwise go without this service due to cost.

Terry Reilly Health Services has been engaged in the negotiated rulemaking process and supports the proposed changes. Our Behavioral Health Director attended all negotiated rulemaking sessions hosted by the ICDVVA as well as providing information back to our Leadership team to determine which model may have been more appropriate for our organization. Although initially considering a different model, further discussion resulted in acknowledgement of adopting the current model which benefited all ICDVVA grant recipients throughout the State. This was extremely beneficial as you began to have a better understanding of other incredibly demanding work that agencies provided. Additionally, we experienced a significant amount of change with the turnover within the Council staff, which prompted us to have a better understanding of the Rules as they have not been updated since 1990.

Terry Reilly Health Services believes the proposed rules represent a necessary change in our method of distributing limited funding for victim services around the state. It is vital to consider the need for services and that is not in the current rules, which merely consider population and geographic area. Idaho needs to be able to distribute victim service funds in ways that directly benefit victims, and Terry Reilly Health Services is confident that the proposed rules accomplish that better than the current rules.



DHW - Prisock

August 15, 2022

Page 2

Our program receives funds from ICDVVA which include VOCA, FVPSA, and State DV. In addition to supporting the rule changes, we support any efforts of ICDVVA to revise Idaho Code Section 39-5212 regarding priority distribution of state domestic violence project grants. Need and demand should be considered with these funds as well, not simply the region in which marriage licenses were issued. Since these funds are the only state funds for victim services in Idaho, and specific to domestic violence programs, we support a revision to the code for the same reasons we support the revisions to the administrative rule changes.

If you have any questions, please feel free to contact me at (208) 467-4431.

Respectfully,

Heidi Hart, CEO

Terry Reilly Health Services

cc: Heather Cunningham, Director, ICDVVA



**WCA**

720 W. Washington  
Boise, Idaho 83702  
(208) 343.3688  
TDD/TTY: (800) 377.3529  
Domestic Abuse Hotline:  
(208) 343.7025  
Sexual Assault Hotline:  
(208) 345.7273  
[www.wcaboise.org](http://www.wcaboise.org)

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**CHIEF EXECUTIVE OFFICER**

Beatrice Black

Equal Opportunity Employer (EOE)  
Proporcionamos los servicios en español

August 18, 2022

Ms. Tamara Prisock  
DHW -Administrative Rules Unit  
P. O. box 83720  
Boise, ID 83720-0036

Dear Ms. Prisock:

On behalf of the Women's and Children's Alliance (WCA), I am writing to express our support for the proposed administrative rules in IDAPA 15.05.04 as they relate to grants administered by the Idaho Council on Domestic Violence and Victim Assistance (ICDVVA).

During my fourteen years with this organization, and for years before my tenure, we have applied for and received funding that has allowed us to provide shelter services to victims of domestic abuse and violence. As one of the largest providers of victim services to survivors of domestic and sexual violence, we could not provide the level of services we do without the support of grants administered by ICDVVA.

Thanks to the process organized by the Council, myself and several other members of the WCA program team were engaged in the review of the existing rules and in the development of the proposed changes. Personally I participated in at least two of the meetings and felt that any concerns or questions were answered and addressed.

It is clear that at the heart of the proposed rule changes is the desire to serve as many victims from around the state. The changes proposed are an effort to serve based on need and not simply on population or geographic area. Even though we have been one of the larger beneficiaries in our geographic area, we fully support these changes in the interest of ensuring better services statewide during a time of declining funding.

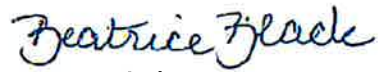
Our program receives funds from all the funding streams the ICDVVA administers, including VOCA, FVPSA and State DV. With that said, another change we support is the effort to revise Idaho Code Section 39-5212 which covers the distribution of state domestic violence project grants. These funds should not simply be tied to the number of marriage licenses issued in a region - but rather distributed where there is a need to provide the most services. These funds are the only state funds dedicated to supporting victim services in Idaho, and specific to domestic violence programs, so we support a revision to the code for the same reasons we support the revisions to the administrative rule changes.



*Safety, healing and freedom from domestic abuse and sexual assault.*

If you have any questions please feel free to contact me at 208-343-3688 ext  
0212 or [bblack@wca Boise.org](mailto:bblack@wca Boise.org)

Sincerely,

A handwritten signature in cursive script that reads "Beatrice Black".

Beatrice Black  
CEO