The below emails and excerpts from subsequent funding agreements show that DBHDS did not require VARR to report on the list of items that was requested in May 2022.

On Tue, May 10, 2022 at 5:23 PM Konen, Kristine <kristine.konen@dbhds.virginia.gov> wrote:
Hi Anthony,

In an effort to increase transparency and streamline reporting related to Indigent Beds, please submit the following on a monthly basis for Indigent Bed Reporting related to 720-4842, 720-4803, and SFA CSLFRF-VARR22:

- VARR Certification Number along with Expiration Date
- House Address
- Number of Beds
- Number of Indigent Beds with Dates of Service and Person Identification (Person 1, Person 2, etc. - no PHI)
- 60-day ahead report indicating which houses are set to expire.

In addition, Pursuant to the General Terms and Conditions of SFA #CSLFRF-VARR22, Section VII, Subsection M, as well as federal regulation regarding documentation of personnel expenses at 2 CFR 200.430(i):

VARR must supply DBHDS with Payroll reports and any additional detail regarding the allocation of payroll for all VARR staff that are directly charged to the funding source.

We will also need a copy of the receipt for the computer purchase (for $794.99), detail regarding the lease payments and proof of payments for the storage costs at Ashland Business Center, and an additional detail regarding the $1,500 and $169.58 charge in Administration costs.

Thank you in advance for all of your efforts.
We appreciate it.
Kind regards,
Kristine Konen, MBA, CPRS
Pronouns: She/Her/Hers
Recovery Services Coordinator
Office of Recovery Services

On Wed, May 11, 2022 at 2:46 PM Anthony Grimes <agrimes@varronline.org> wrote:
Good afternoon,

Thank you for sending over this information. For your review I have attached copies of the receipts as requested for computer equipment (we are happy to send pictures of the individual utilizing the computer as well as the serial number if needed) as well as the 1,500 payment made to EVA for the contract fee. In regards to the payroll reports can you please notify me of which months you would like those reports so we can pull them from the ADP portal. As far as the proof of payments for the storage facility the quickbooks report reflects the vendor and check number in the submitted report which verifies payment was made to that facility, please advise as to what more is needed.

In regards to the items related to indigent bed reporting I have attached a spreadsheet that encompases what was requested. We utilize the REC-CAP platform via FM subscription in the system to track day by day allocated and utilized funding per organization which is reflected in the attached spreadsheet. As reflected in the spreadsheet there is a large number of bed nights being utilized by a large number of individuals in need of recovery residences. In order to produce reports from the system formatted in the manner outlined in the email it would require a software rewrite and would take an estimated 90 days with a cost of $40,000 dollars. Please advise if DBHDS is interested in funding these revisions to the platform which would be needed in order to pull reports with the specifics as outlined in your email as it pertains to indigent beds.

The funds were released to VARR the following week (see VARR-DBHDS email compilation), and DBHDS did not enforce production of the requested information. Instead, VARR's reporting requirements remain void of significant detail:

Contract No. 720-4842 Modification:

> 3. Reference Page 3, Section V of the basic contract— Reporting Requirements: add the following to the reporting requirements:
>
> a. The contractor shall provide comprehensive monthly progress report to Kristine Konen (Kristine.konen@dbhds.virginia.gov). Per VARR, VARR's REC-CAP software only allows one payer-source at a time per individual. Reporting will include:
>
> i. VARR ID# for Organization with all-inclusive House ID #s.
>
> ii. Number of Indigent Beds (total Bed nights utilized per month)

CSLFRF-VARR23 (Subrecipient Funding Agreement for year 2 of VARR's $10 million award):

> **III. SCOPE OF SERVICES:** The Scope of Work for this agreement will include:
>
> **A. Virginia Association of Recovery Residences shall:**
>
> 1. Administer agreements to recovery organizations across the Commonwealth which provide direct services through indigent bed disbursements, intensive thirty (30) day recovery programs, and addiction management and counseling.
> 2. Expand recovery support services through targeting rural and underserved urban areas with a focus on expanding minority ownership of recovery residence housing. VARR will assist and provide oversight in planning and technical assistance of the capacity building activity of this objective.
> 3. Provide comprehensive monthly reporting to DBHDS Office of Recovery Services - Kristine Konen Kristine.konen@dbhds.virginia.gov. VARR's REC-CAP software only allows one payer-source at a time per individual. This report will include VARR ID# for Organization with all-inclusive House ID #s and Number of Indigent Beds (total Bed nights utilized per month).
> 4. Maintain sound fiscal and expenditure tracking practices to appropriately monitor spending.
> 5. Limit expenditures to activity approved by DBHDS in accordance with Attachment D (Approved Budget) and submit invoices as detailed in Section IV of this agreement.
> 6. Participate in a monthly progress call with DBHDS Office of Recovery Services.

Through a FOIA request, I obtained all reports that VARR provided to DBHDS through June 2022. The initial list of items Konen requested in May 2022 were not included in VARR's reports.

In a list of questions that I provided to DBHDS in late September, I asked about the reason for this:

> *I reviewed VARR's reports for 4/1/22 - 6/30/22, and those reports did not include the items Ms. Konen requested - just the total number of bed nights per organization (which could be obtained by simply dividing each organization's payout by the amount allotted per night).*
>
> *I am struggling to understand why DBHDS did not enforce what appears to be such a minimal request for information that could be produced without software at all. Is there any insight or additional context that could be provided regarding the Department's decision not to enforce the requested reporting?*

DBHDS did not respond.