

**VAWA Session #1: Survivor Advocates & Victim Service Providers**  
**June 22, 2023**  
**Session Transcript**

**Attendees:**

1. Little River Band of Ottawa Indians
2. National Resource Center on Domestic Violence
3. Enfuse Action Collective
4. Young Women's Christian Association (YWCA) of Greater Cincinnati
5. YWCA Glendale and Pasadena
6. YWCA Richmond
7. YWCA St. Louis, MO
8. YWCA North Central Indiana
9. YWCA Cass Clay
10. YWCA National Capital Area
11. YWCA San Gabriel Valley
12. YWCA White Plains & Central Westchester
13. YWCA San Antonio
14. YWCA Kauai
15. YWCA Yakima
16. YWCA Oklahoma City
17. YWCA Madison
18. YWCA Hamilton
19. YWCA Southern Arizona
20. YWCA La Crosse
21. YWCA Nashville
22. YWCA Utah
23. YWCA Evanston/North Shore
24. YWCA Northwestern Illinois
25. YWCA Southeastern Massachusetts
26. YWCA Enid
27. YWCA Pierce County
28. YWCA Syracuse
29. Uncorked advocates
30. Kansas Coalition Against Sexual & Domestic Violence
31. American Civil Liberties Union (ACLU) Women's Rights Project
32. Freedom Network USA (FNUSA)
33. National Network to End Domestic Violence (NNEDV)
34. National Alliance to End Sexual Violence (NAESV)
35. Casa Myrna
36. Texas Council on Family Violence
37. The Network: Advocating Against Domestic Violence
38. National Housing Law Project
39. Pierce County Human Services, Washington
40. New York State Coalition Against Domestic Violence (NYSCADV)
41. NJ Coalition to End Domestic Violence (NJCEDV)

42. National Resource Center on Domestic Violence (NRCDV)
43. Pennsylvania Coalition Against Domestic Violence (PCADV)
44. Washington State Coalition Against Domestic Violence (WSCADV)
45. The Kentucky Coalition Against Domestic Violence (KCADV)
46. Michigan Coalition to End Domestic and Sexual Violence (MCEDSV)
47. Louisiana Coalition Against Domestic Violence (LCADV)
48. Casa Julia
49. The Corporation for Supportive Housing (CSH)
50. National Indigenous Women's Resource Center (NIWRC)
51. Proyecto Matria
52. Observatorio De Equidad De Género - Puerto Rico
53. Texas Council on Family Violence (TCFV)
54. Ohio Domestic Violence Network (ODVN)
55. Coordinadora Morivivi, Inc.
56. Human Development Commission - Caro
57. Violence Free Minnesota
58. Centro La Familia Advocacy Services
59. Los Angeles Homeless Services Authority
60. Justice + Joy National Collaborative
61. The Safe Housing Alliance

#### **HUD Attendees**

- Chang Chiu, Office of Fair Housing and Equal Opportunity
- Claudia Monterrosa, Office of Community Planning and Development
- LaToya Young, Office of Community Planning and Development
- Erik Heins, Office of Fair Housing and Equal Opportunity
- Holly Martin, Office of General Counsel
- Elly Kugler, Office of General Counsel
- Jessie Handforth Kome, Office of Community Planning and Development
- Sheena Bright, Office of Community Planning and Development
- Alexandra Lippincott, Office of General Counsel
- Lucia Petty, Office of Fair Housing and Equal Opportunity
- Savin Ven Johnson, Office of Community Planning and Development
- Clarissa Kimmey, Office of General Counsel
- Alvina Thamba, Office of Community Planning and Development
- Lynn Grosso, Office of Fair Housing and Equal Opportunity
- Daniel Hankes, Office of General Counsel
- Danielle Garcia, Office of Public and Indian Housing
- Elayne Weiss, FHA/ Office of Multifamily Housing
- Edkesha Anderson, Office of Community Planning and Development
- Jennifer Lavorel, Office of Multifamily Housing
- Sam Jacobson, Office of General Counsel

- Karlo Ng, Office of the Secretary
- Dr. Ruth Jones Nichols, Office of Public Affairs
- Imani Edwards, Office of Public Affairs

## Transcript

### **Updates from Karlo Ng, HUD Director, Gender Based Violence office.**

[Karlo Ng, HUD Director, Gender Based Violence Office, let everyone know the session would be recorded. HUD welcomed everybody to the first consultation session that we have here at HUD for VAWA 2022 implementation.]

Karlo Ng (HUD): We are really excited to have you all here. This session is focused on folks who are survivor advocates and victim service providers, or those who advocate on behalf of survivors, so that's the audience. But please also know that we have HUD staff on the line. Most of us (HUD) will not be speaking. We are here mostly in listening mode but know that there are folks in different program offices at HUD that are represented.

Karlo Ng (HUD): Alright, so let me go ahead and share my screen. So that I can talk you through some of our gender-based violence prevention priorities. So obviously, we are here today to talk about the Violence Against Women Act. But I also want to take the opportunity to provide the context in which we do our VAWA implementation and enforcement work, so that we all are on the same page in terms of our approach and our values.

Our number one priority is really centering survivors. It's incredibly important that when we talk about addressing the housing needs of survivors that we're always focusing on their experiences, and their individualized and diverse experiences that they're bringing to the table.

Being trauma-informed is incredibly important. We're actually engaging in a series of trainings that will start during the summer and will start that process of helping our HUD staff that we know interface with survivors as part of their jobs on a daily basis. The trainings will help us make sure that HUD staff have some training on trauma-informed practices and care as well as have an overview on VAWA and other basics of domestic violence, sexual assault, dating violence, stalking, as well as human trafficking.

We're also centering the experiences of populations that have historically been marginalized including folks who are immigrant survivors, survivors of color, survivors who are experiencing disabilities, LGBTQI+ survivors, and other folks. We are really making sure that we are focusing on those populations and their experiences in this conversation.

Also centering folks who are "hard to serve" -- shorthand for folks that have a lot of barriers. Their backgrounds present a lot of issues that make them hard to serve in terms of providing housing assistance and other housing-related services for them. Some folks who have criminal records, for example, or people who have bad or no credit history, or folks with eviction records or other kinds of problematic housing histories that really make it extremely challenging.

Survivors are not one-dimensional; they're not two-dimensional. Survivors are bringing in a lot of different experiences, perspective, lenses, lots, and lots of layers that we need to be mindful of, and being very, very, intentional when we are talking about serving survivors at specific institutions.

HUD has created a feedback loop. Certainly, with these consultation sessions, but also separately and in relation to gender-based violence work, we're being very intentional in making sure that we always include the voices of those with lived experience and voices of those who are survivors. In addition to that, we are also making sure that we are working with folks like you, survivor advocates, and service providers as well as housing providers that are also working directly with survivors. Our next listening session, which is tomorrow, is going to be focused on folks who are providing housing services and housing programs to survivors, and gathering and analyzing data. HUD has very little data on survivors and their housing needs and their housing barriers. One of the priorities that HUD Secretary Fudge outlined very early on is that we need more information to truly serve survivors and meet them where they're at. We need more data, and we need analysis and information to be shared with other folks.

Implementing and enforcing survivors housing protection, which is the focus of our conversations today. But certainly, that is a major priority that we have as part of our gender-based violence prevention work. Providing resources that target assistance to survivors is another one. There are some programs that HUD has right now that already explicitly target survivors like Emergency Housing Vouchers. Our Stability Voucher Program is another one. Our HOME-ARP program is another one. I know that there are challenges to getting these resources to survivors, but that first step of targeting some resources is happening, although we can do more. There's more that we can do in terms of thinking more extensively about how even programs that we've had for many, many years, like our CDBG program, which has and continues to be used to help domestic violence survivors can be used more intentionally by working with participating jurisdictions, providing training and support to make sure that they know that they can use these funds to help survivors and their families.

Provide programs and services that create pathways to economic stability for families and individuals. What we are hearing from survivors is that as much as it is critical to get crisis intervention, rental assistance, transitional housing, etc., a lot of folks want to get out of systems. A lot of folks have dreams, such as buying a home one day, being a homeowner, or having other kinds of assets that really get them out of systems. How do we get survivors who are experiencing financial hardships onto pathways where they can become more economically stable, and ultimately have safe, stable housing?

Today we are going to talk about VAWA.

I think everyone here knows VAWA doesn't exist on its own in terms of it as a singular source of providing housing protections for survivors. It is part of patchwork of laws that do so for survivors. Here I list some of them. The Fair Housing Act is another one. There's the Federal Fair Housing Act, and some States have sort of State equivalent of the Federal Fair Housing Act that explicitly provides housing protections for survivors. There are also some state and local housing laws across the country. Some of the state and local laws are tenant-landlord laws, others look differently, and those laws try to fill in the gaps of where the Federal laws end and where there are gaps.

As you know, VAWA only applies to federally assisted housing, and the State and local laws often will apply to private housing where it doesn't matter whether or not there's actually a subsidy. I've provided there's some examples of what State and local laws may do that VAWA doesn't cover in terms of the private housing.

Here's a little bit of background on the Violence Against Women Act. It was enacted in 1994 as part of a crime bill, reauthorized in 2005 for the first time. That 2005 re-authorization of VAWA was the first time that we saw a housing title included. For the first time, we saw substantive housing protections in VAWA for survivors. Since then, VAWA has been re-authorized in 2013 and 2022.

Where are we right now? VAWA provides housing protections for survivors of domestic violence, sexual assault, dating violence, and stalking that are applying for or living in federally assisted housing.

The law applies to a survivor regardless of sex, gender identity, sexual orientation, disability, or age. Even though the title is called the Violence Against Women Act, the housing protections apply to anyone regardless of their gender, gender identity, or sexual orientation. VAWA does not apply to market-rate rental housing unless there is some kind of Federal subsidy involved.

Since we're talking so much about Federally assisted housing, what kinds of programs are covered by VAWA? This is the list. The ones that are highlighted in red are what 2022 added to the list of federally assisted housing programs. The ones in black are the ones that existed before 2022, and as of the 2013 re-authorization.

Here's a snapshot of some of the substantive housing protections that survivors have. Again, this is just a couple that I selected that are significant. But there are many, many more rights that are in the provisions that I didn't provide here.

There are some nondiscrimination protection rights. Survivors cannot be denied admission, be evicted, or have their housing terminated because of the violence that they've experienced. There's a right to confidentiality -- for survivors to have their information about being a survivor and their family's information be strictly confidential.

Survivors can request that a perpetrator be removed from the housing unit. This is often called a lease bifurcation, but it might be called something different, depending on the situation.

This next protection isn't specific to survivors. Anyone who gets an eviction notice and all who are denied housing or who have been accepted into housing, must receive a notice of VAWA housing rights and the self-certification form. This applies to anyone across the board.

A survivor can also request an emergency transfer if the reason for that transfer is related to safety, or the reasons related to the violence that they've experienced. Survivors with vouchers can move with continued assistance if, again, the move is needed to preserve their safety, or they are experiencing trauma. A survivor cannot be retaliated against because they are asserting their VAWA rights. This protection is new as of 2022. There is also a right to call police or 911

or emergency services without penalty. There's also a requirement that CDBG Participating Jurisdictions. These Participating Jurisdictions have to certify and report certain problematic laws or policies that might or violate that provision that I just talked about in terms of the right to report.

There's also explicit VAWA enforcement authority given to HUD and DOJ to enforce VAWA. Federal agencies, including HUD, must establish VAWA compliance processes, which is one of the questions that we have for you all today to gather your feedback.

There is an amendment to the definition of homeless under the McKinney-Vento act to specifically address the homeless definition that only affects survivors. There are a couple of homeless definitions in the McKinney Act, and VAWA only amended the one that applies to survivors.

VAWA 2022 establishes a Gender-based Violence Prevention Office and creates a VAWA Director position at HUD. It requires HUD to conduct a study assessing the housing needs of trafficking survivors experiencing homelessness or housing disabilities, and it authorizes HUD funding for VAWA training and technical assistance.

Here is the HUD VAWA website:

[Violence Against Women Act \(VAWA\) | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

There, you'll find FAQs, trainings, forms, legal authorities, and referrals for survivors who need direct services. HUD does not provide direct services. There's a disclaimer on the website, as well as additional information for survivors who do need that direct help. There is more information for survivors who want to file a complaint about potential VAWA violations.

Here are just some highlights about our recent VAWA implementation efforts. In 2022, we supported the passage of VAWA 2022 reauthorization. We then started some trainings for HUD grantees working closely with program offices. We began a study on the housing needs of trafficking survivors. I have been working very closely with our Office of Policy Development and Research. We only had about a year and a half to do this study. The report is due to Congress in September, and we are on track to get that done. We held our first interagency VAWA meeting. All the five Federal agencies met for the first time to talk about implementation issues. We're going to have another meeting next month.

We published a sixty-day notice for the VAWA 2013 forms which many of you know expired in 2017. We are working hard to get the thirty-day notice out related to those forms. We created the VAWA website in 2023 and published in the Federal Register our interim guidance for VAWA 2022 implementation.

Our FHEO office, which is our fair housing office, issued a VAWA enforcement notice. Our Fair Housing Office also launched the VAWA Enforcement Pilot Project. For the first time,

HUD has direct enforcement authorities under VAWA. We had to create an infrastructure to gather the complaints that would be related to those kinds of enforcement issues.

Looking ahead, there's a lot of exciting things happening. We will be awarding ten million dollars for Fiscal Years 2022 and 2023 for training and technical assistance funding. This is critical. HUD has never had this kind of funding across the entire agency devoted to VAWA implementation. For those of us who have done this kind of TA for housing providers for years, we know that this is crucial in order for survivors to get these protections and access their housing. Housing providers need support, and they need continuing training and technical systems. So, this is huge for us as an agency.

We're also holding our VAWA listening sessions which are following our consultation sessions. The training series for HUD is starting this summer. The ones that I talked about regarding being trauma informed, providing an overview of VAWA, etc.

The goal is to publish updated VAWA forms this year, fingers crossed. But we'll see, it might be early next year. We're also trying to get a proposed rule out for VAWA in 2023 and of course, establishing the Gender-based Violence Prevention Office is a huge priority for us.

### **Comments from Dr. Ruth Jones Nichols**

Dr. Ruth Jones Nichols (HUD): Thank you, Karlo, and thank you to our colleagues, who provided the initial introductions for today's consultation session. I am Dr. Ruth Jones Nichols, Deputy Assistant Secretary for Public Engagement here at HUD. I have the awesome privilege of serving as the moderator for the next segment of this consultation session,

Now, based on the individuals who registered to participate, we know that we have a very diverse group of individuals representing organizations with expertise in the housing needs and experiences of survivors of domestic violence, dating violence, sexual assault, and stalking. Our goal for today's consultation session is to hear from you regarding several key areas of focus that will inform regulations and related guidance to our implementation of the Violence Against Women Act Reauthorization Act of 2022.

For today's consultation session, there are four main areas of focus that we would like to address. The first includes the standards of compliance under HUD VAWA covered programs. The second is the detailed reporting requirements, including the number of VAWA emergency transfers requested and granted, as well as the length of time needed to process emergency transfers. The third area of focus is standards for corrective action plans, VAWA compliance standards that have not been met, and the final area of focus is other issues related to HUD's implementation of our housing provisions. What I'd like to do for you now, in case some of you came with prepared comments, is preview the questions we have for each area of focus, starting with standards of compliance under HUD by our covered programs.

### **Focus Area One: Standards of compliance under HUD's VAWA covered housing programs.**



- What are your general recommendations for how HUD can further define standards of compliance and corrective action?” Plans under HUD’s VAWA covered programs.
- While additional housing programs are now covered by VAWA 2022 are there any HUD programs not covered that should be covered? And if so, what are your general recommendations?

I'll move now to the second area of focus again, just to preview the question, so that you have an idea of what we hope to cover during today's consultation session.

**Focus Area Two: Detailed reporting requirements, including the number of VAWA emergency transfers requested and granted, as well as the length of time needed to process emergency transfers.**

- What are your recommendations for or concerns about reporting requirements and the length of time for emergency transfers.

Again, we're going to dedicate time for you to address these questions, but we'd like to preview them in advance.

**Focus Area Three: Standards for corrective action plans where VAWA compliance standards have not been met.**

- Please discuss your perspective about potential standards for corrective action plans or VAWA compliance. What standards for corrective action plans do you propose? VAWA compliance?
- How can HUD work with housing providers to ensure that appropriate actions are taken both proactively and reactively where VAWA compliance standards are not being met?

**Focus Area Four: Other issues related to HUD's implementation of VAWA housing provisions.**

- Are there any other VAWA implementation or enforcement issues or recommendations that you would like to share with HUD today?
- Do you have recommendations about how HUD can best share key updates and opportunities for engagement with you or the organization you represent?
- What training programs for technical assistance would you recommend or offer to increase understanding about our housing rights and obligations?
- Under VAWA 2022, HUD must establish a Gender-based Violence Prevention Office, as you heard previously. After it is established, what would you like to see the Office do in the next 2-3 years?

We're asking everyone to limit their comments to approximately three minutes, so that everyone who desires to have an opportunity can speak. And if for some reason we're not able to get to all the comments, we will follow up and provide an opportunity for you to share your recommendations, concerns, or general input.

When sharing, we invite you to turn on your camera, if possible, and obviously ensure that your audio is working properly.

## **Focus Area One: Standards of compliance under HUD's VAWA covered housing programs.**

With that we'll go back to our first area of focus. And the two questions that we have there.

- What are your general recommendations for how HUD can further define standards of compliance and corrective action plans under HUD's VAWA covered programs? Do we have anyone who would like to address that question? Again, we invite you to turn on your camera and audio at this time.

Monica McLaughlin (NNEDV): Hi, everybody! I'm Monica. I'm with the National Network to End Domestic Violence. I work with the domestic violence, housing, technical assistance consortium (DVHTAC) and the safe housing task force. We submitted comments and those are in the chat box. But I did want to particularly talk about compliance broadly. First, thank you everyone for this. On pages fourteen and fifteen, we talk about compliance. We really see this as a huge win in the VAWA regulation to be able to move upstream when making sure that the stakeholders responsible for implementing the Violence Against Women Act are doing that well, and with oversight and guidance from HUD and other Federal agencies. So, you know, we think about how VAWA implementation has gone, you know, since 2013, and before, and we know that this piece, adding the compliance will help ensure that survivors don't necessarily have to negotiate their own situations. If the housing providers can actually now comply with VAWA then the survivors won't have to take their cases on individually, right? One of the things that we are hopeful about is that the standards of compliance need to really go beyond verification. They're not asking, you know, HUD funded entities to sort of say Yes, I do comply with that with checker box. We really wanted to go deeper than that. We'd like there to be an audit of a tenant and applicant files. We want required documentation of the assistance that they were offered to survivors.

We'd love the compliance review to actually interview frontline staff people, tenants, including survivors and local advocacy groups, including culturally-specific organizations and victim service providers. We also see that compliance can certainly be folded in with other things that HUD is looking for in compliance around Section 504, ADA compliance, Fair Housing compliance, and limited English proficiency, etc. Broadly, we really do see compliance as part of all of the strategies working together.

But we do know that training and technical assistance will help along with communication with all the work HUD has been doing to really be public about these things and will help survivors better understand their rights.

Dr. Ruth Jones Nichols (HUD): Thank you, Monica.

Laela Kashan (NAESV): Is it okay? If I go next?

Dr. Ruth Jones Nichols (HUD): Absolutely

Laela Kashan (NAESV): Great, and my name is Laela. I'm with the National Alliance to End Sexual Violence, and I'm just going to build on what Monica said. She did a beautiful job of explaining, so I won't hit on those same things. But I do want to let folks know that the Alliance has a new project. I'm the Housing Project Coordinator there. And even though you know VAWA 2013 added Federal housing protections for survivors of sexual assault, we're still seeing some gaps, and how sometimes there is sort of a lumping in of all sexual assault survivor needs within, for example, the domestic violence context. So we do want to lift up that need.

And just thank everyone for hosting this and for HUD's commitment to VAWA requirements especially. I wanted to add to those prevention priorities that Karlo outlined. I think if we can center those going forward, we're going to make a really big difference, and some of the things that folks might not realize. And I'm guessing everybody on this call probably does, because I thought there would be some of the HUD providers here, too, for a little bit more education, but sexual assault, you know, happens and impacts people across their lifetime. And also if someone is homeless, and if they can't get an emergency transfer or these compliance things are not happening, we're putting folks at risk of further harm, including sexual assault. So, in the housing context, specifically it could look like not feeling safe at home, even if the sexual assault didn't happen there. Sexual harassment by a neighbor or a landlord, or just needing to change your housing or getting a person out of your home due to, for example, child sexual abuse within the home.

But a couple things I think would be important. And this doesn't just go to your first question, because I just kind of thought about the broad questions when the email went out. But to require housing providers to collaborate with sexual assault programs, especially if there is a corrective action plan. If they're doing that, maybe they're not doing it well, it's very likely that they're not doing that at all, so that to be a very clear requirement that is, being checked for compliance also requiring the housing provider's confidentiality plan or policy to be public to be shared with tenants, and to ensure survivor confidentiality even in the data collection, because we want to see the data. We want to know how many people are requesting this, but ensuring that they are not sharing any personally identifiable information.

When we talk about the data collection around, how many folks are asking for VAWA protections and transfers. For example, we want to see a breakdown of the types of requests. So what I mean by that is, if we're saying there are ten sexual assaults. We want to know if those are intimate partner sexual assaults which fit also under the domestic violence, or non-intimate partner sexual assault, and so that would include sexual assault by anyone else which could be a coach, a landlord, a friend, a stranger, a coworker that could impact the housing. And we think that's really important, because we know that half, or sometimes more than half depending on the data you look at that people are being sexually assaulted by non-intimate partners, and so being able to really see those numbers on those requests, I think can tell us a lot of different things. And so, since we know that sexual assault, abuse, and harassment impacts people throughout their lives, and VAWA can really help mitigate the negative impacts that's entering survivor voices and needs. We just want to say thank you for having this session and for moving forward with the great work.

Dr. Ruth Jones Nichols (HUD): Thank you, Laela. And as a reminder to everyone. Please feel free to raise your hand if interested in commenting. I don't see additional hands regarding this question. But if there are others who like to comment, please feel free to come on camera at this time.

Dr. Ruth Jones Nichols (HUD): Jackie.

Jackie Koriath (The Network: Advocating Against Domestic Violence): Hi, everyone! I just have a couple of brief comments. I also did the written comments. I'm Jackie Koriath, I work at The Network: Advocating Against Domestic Violence. We're located in Chicago. We do statewide work, including IL's domestic violence hotline. But I had two kinds of brief comments on this particular question. The first is that as we look at compliance, I think that different VAWA issues can have a different level of urgency. So especially when we're looking at transfers, and someone that needs a really quick solution. It would be great if there were pathways to a very urgent solution. Especially as we kind of look at proactive and reactive responses. I think some reactive responses need to be quite urgent, and it would be great if there was a pathway for that.

My other brief comment is that as a kind of compliance, and what compliance looks like is defined, it would be really great if there were timelines, for what responses look like for survivors. What I see often is that survivors need help with something they might connect with a housing provider, and then they simply don't hear back. And so I think one thing that I'm starting to see more that I'm trying to help more, get into more transfer plans and things like that is kind of like potential timelines, for when they're going to hear a response, even if that's not an immediate solution, which I think is harder to narrow down. But that will happen. Having a response, letting people know that they've been heard that they're working on a solution or kind of connecting them to a different agency, I think, having timelines around, that would be really helpful for people.

Jackie Koriath (The Network: Advocating Against Domestic Violence): Thank you.

Dr. Ruth Jones Nichols (HUD): Thank you, Jackie,

Dr. Ruth Jones Nichols (HUD): We have time for one more response to this question. If there are any. We will move forward to the next question related to this area of focus, and that question is while additional housing programs are now covered by the VAWA reauthorization Act of 2022. Are there any HUD programs not currently covered that should be covered? If so, what are your general recommendations?

Dr. Ruth Jones Nichols (HUD): I don't see any responses to that question at this time. However, we invite you to share a comment or a thought in the chat. If you desire, later, during the consultation session.

[Comment in the chat:

Caroline LaPorte: This is from the Tribal space and is in response to HUD's Dear Tribal Leader Letter that was sent in August of 2022.

<https://www.niwrc.org/sites/default/files/HUD%20Consultation.pdf>

Carrie Eischeid (FNUSA): Response to Question 2: Currently, VAWA does not cover the DOJ/OVC funded housing projects. It will be beneficial for survivors to have these protections while accessing housing through these DOJ/OVC funded housing programs.

Stephanie Brown (Casa Myrna): Regarding Question 2 about programs that should be covered under VAWA - ALL units in a multifamily housing development should be covered when only a few may be covered based on the funding source. For example, only families in HOME- or Housing Trust Fund-funded units in a development are eligible for emergency transfers while other families in the same development are not. It causes extreme confusion for tenants and advocates about who is eligible for a transfer and other VAWA protections and who are not.]

**Focus Area Two: Detailed reporting requirements, including the number of VAWA emergency transfers requested and granted, as well as the length of time needed to process emergency transfers.**

Dr. Ruth Jones Nichols (HUD): We're going to move now to our next area of focus, which is the detailed reporting requirements, including the number of VAWA emergency transfers requested and granted, as well as the length of time needed to process emergency transfers.

- What are your recommendations for and what concerns do you have about reporting requirements? And the link of time for emergency transfers? We invite you to turn on your camera if you have a response, and if you prepared comments, that is fine.

Dr. Ruth Jones Nichols (HUD): Next is Caroline.

Caroline LaPorte: Yes, I'm sorry I didn't have my hand up. I wasn't quick enough for the last question. I just want to revisit that really fast. And my comment is very short. For a tribal community, tribal housing entities are tribally designated housing entities that receive funds under NAHASDA, which is the native American self-determination Housing Act, that the Indian housing block grants are not covered by anything really under VAWA 2022, or the previous housing provisions. I think, with the exception of 2005, we prefer to keep it that way from Indian country. There is negotiated rule-making that is housed within NAHASDA that is part of the Federal Government's trust responsibility to native tribes, and we very much would view any sort of abrogation of that process as a violation of a tribal sovereignty in general. But I feel like it needs to be very clear here that in terms of the tribes that are only utilizing the funds from that specific act. We do not want those to be HUD covered entities.

Dr. Ruth Jones Nichols (HUD): Thank you for sharing that input.

Dr. Ruth Jones Nichols (HUD): Are there others who would like to address the question, what are your recommendations for and or concerns about reporting requirements in length of time for emergency transfers?

Dr. Ruth Jones Nichols (HUD): Jackie.

Jackie Koriath (The Network: Advocating Against DV): Hi! I'm back. I don't want to overtake my turn again. A very quick piece of feedback. So, our area is lucky enough to have a VAWA project-based Section 8 pilot and so I work with a lot of the large multi-family providers, and a lot of them are considering this data reporting piece of it. I have had some very large providers just say we don't get those; we've never had one. I think part of the data reporting should also be considering what's happening when people are saying there's no transfers at all. As like a part of all the information that's being collected. Because I think what we all likely know is that if that's happening, then probably people aren't getting VAWA notice, or don't understand what their rights are. Even though obviously we have the notice documents, right? So, I just want to put that out there.

Dr. Ruth Jones Nichols (HUD): Thank you, Jackie, and it looks like Natalie has her hand up.

Natalie Maxwell (National Housing Law Project): Hi, thank you, Natalie Maxwell, with the National Housing Law Project. I have a few specific recommendations on the data collection on the emergency transfer. Some of which we have previously submitted via written comments. But before I get to that, I just want to flag this overarching issue about the structuring of emergency transfers, lease bifurcations, and family break-ups because they are treated as if they are completely separate events for survivors, and we think that in order to fully implement VAWA, they need to be treated collectively and as a spectrum of housing retention options for survivors in covered housing programs - both to address some of the complexities that other folks have referenced with regard to navigating housing, because there are both kinds of short-term solutions and long-term solutions. It would be helpful for HUD to provide some additional guidance that mandates collaboration with victim service providers as well as culturally-specific organizations. When it comes to prioritizing all these requests as emergencies. And so, you know one of the issues that we continue to see similar to what Jackie referenced is how the transfers are actually effectuated. And there is this distinction between internal and external transfers which really frustrates the transfer process given VAWA's goals. So in terms of you know, data collection that HUD's considering that would be helpful in highlighting some of the need, we think, tracking the number of survivors who leave a housing program while the emergency transfer is pending would be helpful, as well as the time that it actually takes a survivor to have a safe unit from the time that the transfer request is made until they're actually in a new unit, as well as the average length of time between emergency transfer requests and the approval. And, just in light of time, I will stop there. Thank you.

Dr. Ruth Jones Nichols (HUD): Thank you, Natalie. I see that a few folks have dropped a couple of comments in the chat, and we thank you for including your feedback there. One of the chat comments is structured in the form of a question, and just as a reminder during today's consultation session HUD staff will not answer questions. However, we will take the question as a comment to consider.

[ Comments from the chat:

Amárilis Pagán Jiménez: It is important to request experience and/or training evidence for providers that want to compete for GBV Bonuses. In some instances, there are providers approved by the local CoC without evaluation regarding the expertise and capacity of providers to serve GBV or manage VAWA regulations.

Amárilis Pagán Jiménez: Will HUD request that HMIS equivalent be VAWA compliant? At this moment, some CoCs are using HMIS Equivalent systems that do not guarantee confidentiality.

Amárilis Pagán Jiménez: Both training and mentoring should be provided by providers selected by HUD. CoC's, at least in PR, do not have that capacity.]

### **Focus Area Three: Standards for corrective action plans where VAWA compliance standards have not been met.**

Dr. Ruth Jones Nichols (HUD): Before we move forward with our next area of focus, I just want to make sure there aren't additional comments regarding recommendations for and/or concerns about reporting requirements and length of time for emergency transfers. Seeing none, I will move forward.

Dr. Ruth Jones Nichols (HUD): We're actually on the second question.

- Please discuss your perspective about potential standards for corrective action plans where VAWA compliance standards have not been met. What standards for corrective action plans should be proposed, where these standards have not been met?

Dr. Ruth Jones Nichols (HUD): Some comments have already addressed this question, but if there are additional comments, we invite them at this time.

Karlo Ng, HUD (she/her): I want to interject a little bit, because "corrective action plans" is really a technical term. I just want to provide plain language to that a little bit. It's a term that we use within the fair housing space. So just want to clarify that the question is, basically if we find that we have covered housing providers who are out of compliance as well, what do you think we should do to help them get into compliance? What kinds of steps should we take, things we should do? I know you all have thoughts. Many of you, I know, have many, many ideas, so please chime in.

Dr. Ruth Jones Nichols (HUD): Thank you, Karlo.

Dr. Ruth Jones Nichols (HUD): And again, it could be that others have already provided their comments. In response to other questions.

Dr. Ruth Jones Nichols (HUD): Natalie, I see your hand up, and so we welcome your feedback.

Natalie Maxwell: Thank you. On the corrective action. I mean as a preliminary matter. You know we're very excited to see the compliance enforcement mechanisms in the 2022 re-authorization. And you know while I think that there is a lot that HUD can do around

compliance, one thing that would also allow survivors and survivor advocates, especially attorneys representing survivors to be a partner in that enforcement is to make sure that the use of the VAWA lease addendum is mandated for all covered housing providers, because that would incorporate the needs and not have to solely rely on HUD to do that, and frankly, one of the common violations that we see is around issuing the required notices. And so, if HUD made clear that the failure to send the required VAWA notices with any notification of termination of subsidy or eviction would be rendered defective. That would be helpful in addition to housing providers that fail to send those required forms should be cited for corrective action in the management Occupancy Review category, and I'm sure we had provided others. So that's the one that's top of my mind.

Dr. Ruth Jones Nichols (HUD): Thank you, Natalie. Stephanie.

Stephanie Brown (Casa Myrna): Hi! This is Stephanie Brown from Casa Myrna. We're a domestic violence program in Boston. Amarillas already wrote it in the chat. But I agree around training and making training and mentoring mandatory for the entity, and that that training is provided by local folks. And if there's a fund at HUD, or if there's a fine to the housing provider that would actually pay for that training inventory to be done by a local like community advocate, legal service, advocate of material and domestic violence or sexual assault program, then that would make it much easier for people to actually provide that kind of support to the housing entity.

Dr. Ruth Jones Nichols (HUD): Thank you, Stephanie.

Dr. Ruth Jones Nichols (HUD): Are there other comments?

Dr. Ruth Jones Nichols (HUD): Sandra.

Sandra Park: Hi, thank you for this opportunity. I just wanted to plug that this sort of basic matter that I think it would be really helpful in the context of an action plan for there to be a look at the overall policy and practices of you know, whoever the housing provider is beyond whatever the specific issue might be that raised the corrective action. And that's especially when we're, you know, in this time where a lot of providers, maybe looking overall at what their VAWA practices are. I think it'd be very useful for HUD to look over all at you know what's going on in terms of VAWA issues within their policy given that HUD will be having communications with that housing provider. So, and I definitely lift up the comments around training. I think that by local providers that will be incredibly important.

Dr. Ruth Jones Nichols (HUD): Thank you, Sandra.

Dr. Ruth Jones Nichols (HUD): It appears that a few comments have addressed this next question. But we'd like to ask if there are additional comments. How can HUD work with housing providers to ensure that appropriate action is taken both proactively and reactively where VAWA compliance standards are not being met. Is there anyone who would like to address that question?



[NO PARTICIPANTS MADE FURTHER COMMENTS]

**Focus Area Four: Other issues related to HUD's implementation of VAWA housing provisions.**

Dr. Ruth Jones Nichols (HUD): We'll move forward to our final area of focus for this consultation session, which is other issues related to HUD's implementation of VAWA housing provisions.

- Are there any other VAWA implementation or enforcement issues or recommendations that you would like to share with us today?

Dr. Ruth Jones Nichols (HUD): I believe It's Geoff.

Geoff Campion: Right? Yes, thank you.

Geoff Campion: I'm Geoff from Campbell's County Human Services in Washington.

Geoff Campion: We have a conflict between our state's expectations of data entry into our HMIS and the HUD standards. Specifically, where HUD says not to do any data entry for domestic violence clients. Our State is expecting that data entry will be performed. We have adopted a policy across the State that clients who are actively fleeing domestic violence are going to be mandatory de-identified. But we have a standing question that we would like to have further clarified. If a client has any history of domestic violence, not just that they're actively fleeing, does this require de-identification?

Dr. Ruth Jones Nichols (HUD): Thank you, Geoff, for that feedback and for raising the question as part of this consultation session.

Dr. Ruth Jones Nichols (HUD): Are there any other VAWA implementation or enforcement issues or recommendations that you would like to share with HUD today? Again, we want to acknowledge and thank the individuals who have placed their comments in the chat. Okay, I'll move to the next question.

- Do you have recommendations about how HUD can best share updates, key updates and opportunities for engagement with you or the organizations you represent?

Dr. Ruth Jones Nichols (HUD): Thank you for sharing the comments in the chat. We appreciate that.

[Comments in the chat:

Laela Kashan (NAESV): Emails and updates to HUD VAWA website are great option.

Carrie Eischeid (FNUSA): Second, the updates on the VAWA website, either via text or recoded video for accessibility needs. Also, having these updates translated in different languages.

Zebulon Beilke-McCallum: I have actually found HUDs twitter updates really helpful, sometimes seeing info I didn't get anywhere else. Websites also good.

Amárilis Pagán Jiménez: Presentations like the one used today. Maybe also sending email notifications when recorded webinars or news are available to be seen.

Lisette Engel: Quick fact sheets with graphics are also extremely helpful, especially for folks with various abilities.

Carrie Eischeid (FNUSA): A listserv about VAWA & GBV updates that people can sign up for. Stephanie Brown (Casa Myrna): Have local CoCs share out, through state coalitions, through OVW/OVC and to their funded entities, and through state victim service state government agencies (as in those that provide VOCA funding).]

D Fox: Hi. Well, this is D. Fox, with the National Network in Domestic Violence. This is more just a compliment, and just being grateful. I think that you all did an amazing job in terms of getting our information, engaging us, giving us opportunities for feedback. I just want to thank you for your leadership, Karlo, it's been amazing as well. We've seen a real shift over the years in terms of having more engagement. The weekly or bi-weekly HUD stakeholder meetings also are really informative, and just always great information. So we're appreciative, and I think, just keep up what you're doing. Thank you!

Dr. Ruth Jones Nichols (HUD): Thank you, D. Fox.

Dr. Ruth Jones Nichols (HUD): We recognize and acknowledge that there are additional thoughts that have been placed in the chat.

Dr. Ruth Jones Nichols (HUD): Larisa Kofman!

Larisa Kofman (Infuse Action Collective): Hi! Everyone! Larisa Kaufman from Infuse Action Collective. One of the recommendations we have, and we would certainly like it to happen on the sooner side, is the establishment of the GBV office. It's very, very important to institutionalize the ongoing efforts of HUD for the field and for housing providers, for victim service providers, for all of us. So that is something that I want to make sure is out there on the record. Thank you.

Thank you. Larisa.

Dr. Ruth Jones Nichols (HUD): Caroline.

Caroline LaPorte: Hi! Can you all hear me? Okay,

Caroline LaPorte: Okay, perfect. I'm sorry. I just want to reiterate what Larisa just said for starters about the GBV office. I think we're all keeping our eye on that as being something that's really critical to making sure that all of this gets implemented and institutionalized for a longer period.

The other thing in terms of how the information can reach, especially providers in Indian country or providers that are serving Native individuals. I think, continuing to establish and build up that relationship with HUD ONAP and making sure that there is like a continued line of communication there, which I know there has been recently again, thanks to Karlo's leadership. The second part of that is that you know we do have housing TA providers under HUD for Tribes who don't necessarily do domestic violence or gender-based violence, but who work and partner with us directly as the new indigenous safe housing resource center. So making sure that those two groups are really in the loop. I'll just share them right now. It's NAIHC - the Native American Indian Housing Council, or the National American Indian Housing Council. And then the second being the Native Learning Center which is housed in FL.

Dr. Ruth Jones Nichols (HUD): Thank you, Caroline.

Dr. Ruth Jones Nichols (HUD): Anyone else?

Dr. Ruth Jones Nichols (HUD): Okay.

Dr. Ruth Jones Nichols (HUD): The Gender-based Violence Prevention Office was mentioned a couple of times, and so we would like to ask, after the office is established, what would you like to see the Office do in the next two to three years?

Dr. Ruth Jones Nichols (HUD): Under VAWA 2022, HUD must establish a Gender-based Violence Prevention Office. After the office is established, what would you like to see the office do in the next two to three years?

[Comments from the chat:

Monica McLaughlin: Ensure access to HUD funds for culturally specific service providers, victim services providers and elevating survivor voices in designing HUD's programs and priorities.

Amárilis Pagán Jiménez: Create a system to receive questions from providers, also to process complaints related to VAWA violations. Maybe creating trainings and a kind of certification to be included as part of the requisites to serve this population.]

Dr. Ruth Jones Nichols (HUD): Caroline?

Caroline LaPorte: Sorry. Really fast. One thing that I think we really have on our priority list for this year in upcoming years is making sure that HUD is included in OVW tribal consultation and that you all participate. You know, on the Nation-to-Nation basis by bringing a decision maker (from HUD) to that to that important meeting.

Dr. Ruth Jones Nichols (HUD): Thank you. Caroline.

Dr. Ruth Jones Nichols (HUD): Monica.

Monica McLaughlin: Hi! Well, I think a lot of what we'd like to see over the next two or three years is building on what we've already seen under Karlo's leadership, but of course, sort of elevating training and TA. We would love to see, of course, the strong focus on VAWA compliance and enforcement, emergency transfers data collection, right? But we also want to make sure that the way that survivors needs are addressed through all of HUD's components, I'm thinking right now about the homelessness system. How is the system responding to survivors needs, so that the spirit of VAWA is really brought over to that part. We've seen great things happen through the CPD office, the SNAPS office, but just enhancing that work to ensure that survivors have access to trauma and informed services on the ground level.

It's going to take a lot to really implement VAWA really strongly. And, in addition to that, things that help increase access for survivors. We're looking forward to implementation of the domestic violence and sexual assault amended definition, of course. So yeah, those are all the things I think. Keep on with the good work.

Lisette Engel: Thank you.

Lisette Engel: Hi! Such a great conversation and thank you so much for this question. We would love to see continued collaboration both with providers, survivors, and agencies across the administration. I think one of the things that often happens is that survivors have to go to different agencies to receive different services when everything is interconnected. And, one thing that we have heard from survivors, that we work with, is additional opportunities to provide directly from them in their local communities. One population that is often overlooked are young moms, specifically young ones of color, with young children, ages eighteen to twenty-four who often have to go to various locations to receive services, and so the collaboration across collaborations of survivors, government agencies, HUD and providers would be beneficial. Thank you.

Thank you, Lisa.

Dr. Ruth Jones Nichols (HUD): DFox!

D Fox: Can you hear me? Okay, Great. Just a couple more thoughts. I wanted to elaborate a little more on what Monica said. I think a great piece on having the office would be working on the implementation pieces. We're often very excited when we get funding or resources through appropriations. But then what we're seeing at the implementation level is often a lack of ability to get those funds. So there's a couple of our membership colleagues who are on this call. We hear feedback from them, for example, like the HOME-ARP funds or something we're really excited about, and people who are trying to apply for those or get access to those, because it's basically says they're for DV/SA programs and survivors. But we're seeing real challenges at the state level of people getting access to those resources and survivors getting access. And then, of course, we're always trying to push for increased access just generally for funds for culturally specific organizations and for community organizations that are providing services for their communities. So that's it. Thanks.

Dr. Ruth Jones Nichols (HUD): Thank you. D Fox. Carrie.

Carrie Eischeid (FNUSA): What I would like to see the office do is the continued expansion inclusion of trafficking survivors and naming, acknowledging labor and sex trafficking and how that is happening in the communities. Also, the continued collaboration and inclusion of anti-trafficking programs getting access to different HUD funding as well as being included and part of some sort of ask or requirement of CoCs and other homeless and housing programs to be inviting trafficking programs to the table. Again, including both sex and labor trafficking. And I think again, the evaluation of the racial disparity. So gender-based violence and how it meets the different housing and homelessness needs.

Dr. Ruth Jones Nichols (HUD): Thank you, Carrie

Dr. Ruth Jones Nichols (HUD): Any other comments or recommendations regarding what you would like to see once the gender-based violence prevention office is established? What would you like to see in the next two to three years?

Dr. Ruth Jones Nichols (HUD): Final question, then, is, what training programs or technical assistance would you recommend HUD offer to you or to your organization in order to increase understanding about VAWA housing rights and obligations?

Dr. Ruth Jones Nichols (HUD): Training or technical assistance that HUD can offer to increase understanding?

Dr. Ruth Jones Nichols (HUD): DFox!

D Fox: Hi! So I'm asking in particular around TA training it will be really helpful for some of the funding or organizations that are getting funding or like the CoC's, PHAs, The HOME funds that they're getting technical assistance and training that all their plans are inclusive of survivors, and hearing survivor voices, and then also victim service agencies, DVSA and human trafficking coalition. So I'm thinking, you know, we're getting a lot of great training from HUD; our programs are. But how can we ensure that those who are providing training to the organizations and the people that we're not entirely connected with that they are really clear on needing to be inclusive of survivors and having survivors access to those resources.

Dr. Ruth Jones Nichols (HUD): Carrie.

Carrie Eischeid (FNUSA): Um, I think additional training specifically on the collaboration between the public housing authorities and how they work with victim service providers in their community when an emergency transfer plan is needed. So really intentional training and collaboration on how that process could work. So again, I think, echoing the implementation piece of these are the steps. This is how you can do that. And really modeling how that communication could look in best practice scenario. So when it is reactive in emergencies, there's established conversations and processes that have already been practiced and or discussed, so that it supports the survivor getting that emergency transfer and what this purpose is supposed to be.

Dr. Ruth Jones Nichols (HUD): Thank you, Carrie.

Dr. Ruth Jones Nichols (HUD): Anyone else.

Dr. Ruth Jones Nichols (HUD): Thank you, again. To those who are placing comments in the chat box. We appreciate your feedback there.

[Comments from the chat:

Lisette Engel: Training directly for the population it is impacting. Often people want to get the information themselves - policy doesn't always equate to practice and information gets lost in delivery, at the local level especially. It's what we hear from young moms we work with.

Amárilis Pagán Jiménez: Some of us have been implementing programs under VAWA for 17+ years and are updated in VAWA provisions regarding the provision of services. But it would be good to have more training pertaining to the specifics that apply when in a HUD grant.

Amárilis Pagán Jiménez I think that it is important to train CPD reps for the monitoring processes. We had issues in the past trying to protect program participants confidentiality while they insist on seeing identificatory data in the records. ]

Carrie Eischeid (FNUSA): I'm sorry I have one other comment. This is Carrie, again. I think again, additional training and TA support around the language access needs when an emergency transfer plan is also needed. I think there needs to be intentional training and support that is provided to folks as well to again ease the need for the emergency transfer. So, it's not impacting the survivor during that process, and providers have intentional steps in place, and there is also part of some sort of compliance and follow up around what that looks like to make sure that those plans are kept updated, and also has the necessary documentation in place.

Karlo Ng (HUD): Ruth, Can I ask for a clarification on a comment that was typed into the chat so that it's really clear. I just want to make sure I'm on the same page. I'm sorry to call on you, Amárilis. But your comment was, you have lots of experience implementing VAWA and you say, but it would be good to have more training pertaining to the specific, maybe program, or that applies when in a HUD Grant. Are you referring to a specific covered housing program or provider? And how exactly VAWA implementation might work in that context? I'm not sure if Amárilis is still on, maybe they hopped off. Okay. Well, I guess we can circle back.

Dr. Ruth Jones Nichols (HUD): We have time for a few more general comments. If you have not had an opportunity to share your thoughts and recommendations. In response to the structured questions that were already asked, at this time I'd like to invite you to share with us. If you have general feedback or other issues again that you would like to present to HUD regarding the Federal agency's implementation of VAWA housing provisions. If you have a comment that has not been shared already. We invite you to share it at this time.

Dr. Ruth Jones Nichols (HUD): Okay?

Dr. Ruth Jones Nichols (HUD): Well, then, with that I would like to thank all of you for taking the time to participate in today's consultation session. As we stated at the beginning, this consultation session was designed to inform regulation and related guidance that will assist in implementation of the VAWA reauthorization 2022. Thank you again for your participation and for your feedback.

Dr. Ruth Jones Nichols (HUD): Look forward to working with you again. Take care everyone, bye, bye.