

## **VAWA Session #2: Housing Providers and Trade Associations**

June 23, 2023  
Session Transcript

### Attendee List

1. CAHEC Management
2. Retirement Housing Foundation (RHF)
3. Westgate Management Company (WGMGT)
4. The Gershen Group, LLC
5. Public Housing Authorities Directors Association (PHADA)
6. ComCap Management
7. Southwest Housing Compliance Corporation (SHCC)
8. Kentucky Housing Corporation
9. Mansermar
10. National Multifamily Housing Council (NMHC)
11. Mercy Housing
12. Institute of Real Estate Management (IREM)
13. Piltch Associates, Inc.
14. Maloney Properties
15. National Affordable Housing Management Association (NAHMA)
16. G R Housing Corporation
17. SPM, LLC
18. Housing Authority of the City of Los Angeles (HACLA)
19. The Schochet Companies
20. Fore Property Company
21. CPM Federal Credit Union
22. University of North Carolina at Charlotte
23. Zeffert & Associates
24. Los Angeles County Development Authority (LACDA)
25. Kimball Tirey & St. John LLP
26. Safe Haven of Tarrant County
27. Tarrant County
28. The State of Michigan
29. The City of Memphis
30. Ohio Housing Finance Agency
31. Housing Authority of the City of Austin
32. Virginia Housing
33. Greater Houston Fair Housing Center
34. Northeast Oregon Housing Authority
35. SHP Management Corp.
36. Solari Enterprises Inc.
37. RPM Living
38. The Westminster Company
39. Wallick Communities
40. Peabody Properties, Inc.

41. Cornerstone Corporation
42. Fairfield Residential
43. Council of Large Public Housing Authorities (CLPHA)
44. Ayuda Legal Puerto Rico
45. Johns Hopkins University
46. Council of State Community Development Agencies (COSFDA)
47. Gwen Volk Infocus Inc
48. National Community Dev Association (DCA)
49. LeadingAge

### HUD Attendees

- Ruth Jones Nichols, Office of Public Engagement
- Imani Edwards, Office of Public Engagement
- Karlo Ng, Office of the Secretary
- Wendy Gomez, Office of the Secretary
- Hannah Gordon, Office of General Counsel
- Daniel Hankes, Office of General Counsel
- Alexandra Lippincott, Office of General Counsel
- Danielle Garcia, Office of Public and Indian Housing
- Holly Martin, Office of General Counsel
- Elayne Weiss, Federal Housing Administration/ Office of Housing
- Lucia Petty, Office of Fair Housing and Equal Opportunity
- Jennifer Lavorel, Office of Housing
- LaToya Young, Office of Community Planning and Development
- Chang Chiu, Office of Fair Housing and Equal Opportunity
- Ginny Sardone, Office of Community Planning and Development
- Lynn Grosso, Office of Fair Housing and Equal Opportunity
- Shenna Bright, Office of Community Planning and Development
- Henrietta Owusu, Office of Community Planning and Development

## 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 housing providers and trade associations. 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. 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.

**Dr. Ruth Jones Nichols (HUD):** Karlo thank you for that introduction. This meeting is being recorded and thank you as well for helping us level set with the background information about recent implementation progress. I find that it is always helpful to have that background information before we jump into a consultation session. Thank you to all of our stakeholders who have joined us today. And good morning for good afternoon, depending on where you live in the country, as you've already heard, the purpose of this consultation session is to assist the U. S. Department of Housing and Urban development in developing regulations and related guidance for HUD's implementation of VAWA 2022.

Now we have a diverse group of housing providers and trade associations who have joined us today and we're looking forward to learning from your expertise in the administration and management of housing programs that are covered under VAWA.

To give you a preview of some of the questions we hope to answer in this consultation session. I'd love for my colleague to share PowerPoint. Thank you so much.

I'll tell you about the areas of focus for the consultation session which we included in our email invitation. So, we're going to focus on four key areas today in terms of the questions we ask.

The first area is standards of compliance under HUD's VAWA covered housing programs and we have a few questions that I will share.

The second area of focus is detailed reporting requirements, including the number of bylaw 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 where VAWA compliance standards have not been met.

And then the final area of focus is any other issue related to HUD's implementation of VAWA housing provision. So again, those are the four areas of focus for today's consultation session.

And then specifically, I want to share with you the questions we're going to ask, so that if, in fact, you did not come with prepared comments, which is perfectly okay, you will have an opportunity to reflect upon what we hope to address. Next slide. Please

## **Consultation Session- Key Questions**

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

- What are your recommendations for how HUD can further define standards of compliance and corrective action plans under HUD's VAWA covered housing programs?
- 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?

### **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, and or concerns about, reporting requirements and length of time for emergency transfers.

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

- Please share your perspective about potential standards for corrective action plans, where VAWA compliance standards have not been met. What standards for corrective action plans do you propose where VAWA compliance standards have not been met?
- 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?

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

- Are there any other VAWA implementation or enforcement issues/ 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 or technical assistance would you recommend HUD offer to you or the organizations you represent to increase understanding about VAWA housing rights and obligations?
- Under VAWA 2022, HUD must establish a Gender Based Violence Prevention Office. After it is established, what would you like to see the office do in the next 2-3 years?

Dr. Ruth Jones Nichols (HUD): That's a preview of our questions so with that we'd like to jump right in.

Now we have allocated an hour for feedback, and we believe that if we all speak for three minutes max everyone will have an opportunity to share. You can respond to multiple



questions. We ask that you just raise your hand, or use the raise and feature, and we will call on you in order.

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

Dr. Ruth Jones Nichols (HUD): We'll drop the questions in the chat as we go along and going back to the first area of focus. When we think about standards of compliance, first question is, what are your general recommendations for how HUD can further define standards of compliance and corrective action plans under HUD’s covered housing programs? Feel free to raise your hand and you can turn your camera on and share your comments.

[Repeats question]

[NO COMMENT FROM PARTICIPANTS]

I'll move forward and ask the second question under this area of focus, while additional housing programs are now covered by the VAWA Reauthorization Act 2022. Are there any HUD programs not currently covered that should be covered? If so, what are your general recommendations?

If there aren’t any comments in response to those questions, we'll move to our next question, and again feel free to raise your hand and come on camera. You can also drop your comments in the chat.

[NO COMMENT FROM PARTICIPANTS]

**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): The next question is, what are your recommendations for and or concerns about reporting requirements and length of time for emergency transfers?

Arlene (PHADA): I work for the Public Housing Authority Directors Association. We represent about 1900 housing authorities of all sizes and all different geographical areas, cities, urban, rural. The length of time is a concern, because, depending on the size of your agency, and where you're located, you will have different processes for an emergency transfer, and you'll have different resources available to you. A larger agency is going to have a lot more readily available housing or vouchers to choose from, where a smaller agency might not even have a voucher program to give someone a voucher and it may not be practical to transfer to another site, because there may not be, for example, another family site. Some small agencies only have one family housing development, so there is a concern about length of time because it’s going to vary so much depending on those factors that I mentioned.

The reporting requirements I would just say I didn't really have an answer for that first question, because it's hard for me and some of our members to envision how the reporting will happen

because you have a point in time where an applicant comes to you, and then when that applicant is eventually housed in the new situation, and how you track that is very complicated and difficult when you're trying to aggregate that information if you're in a housing authority. So, I guess, I would look to HUD to say, what can HUD do in terms of some of the things that already exists, like the reporting forms on the 50058 for example allows you to provide a lot of information to HUD and perhaps that form could be expanded to include things like 'When did the applicant come to you?' You could put in that first date that you met with the person who's requesting the emergency transfer, and then, when it gets resolved you'll enter another date. And HUD can analyze that data and pull from that data?

I guess I don't think the onus shouldn't be on the housing agency, because housing agencies, aren't going to get any additional funds for any of this and it is a lot of additional work whereas this office is being created within HUD so hopefully they could monitor the data that HUD receives already. If that form is expanded to include these things. Thank you.

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

Are there others who would like to weigh in regarding this question, what are your recommendations for and or concerns about reporting requirements and the length of time for emergency transfers?

Janelle Scott (CLPHA): Hi! Good afternoon. My name is Janelle Scott. I'm. Director of Policy and Research with CLPHA, the Council of Large Public Housing Authorities. I represent large housing authorities. Very similar to our previous statements, we are always concerned about unfunded mandates and additional reporting requirements that come along with that. On the flip side, we did have a conversation with a lot of our members related to their concerns about the reporting requirements and what they're currently tracking. Our agencies have the benefit of being large and have larger staff, and so they are currently actually collecting a lot of the data related to VAWA emergency transfers, and it wasn't a major source of concern for them. However, I do imagine, for smaller housing authorities where staff capacity is a challenge, that would be a concern.

As it relates to another comment that Arlene made about not having enough vouchers. We did have a lot of concern raised around what to do when you don't have a voucher. A lot of large housing authorities can absorb and that's usually the preference, in the case of emergency transfer plans, families request a voucher, but there's not always a circumstance where vouchers are available. For agencies that don't have a voucher, there is not a lot of guidance on what to do in their emergency transfer when they don't have a voucher. So, that would be my recommendation moving forward for the model transfer plan is giving more specific examples on how the housing authorities can support these families when there simply is not a voucher available. What are alternative options available as well as dealing with the private sector as well.

Dr. Ruth Jones Nichols (HUD): Thank you, Janelle. It looks like Juliana has her hand up.

Juliana Bilowich (Leading Age): Yes, Thank you. And I also don't have my video on. So sorry about that. But thank you so much for hosting this call and giving us the chance to weigh in. I really appreciate the background info and these questions. So, my name is Juliana and I'm with Leading Age which represents a nonprofit of affordable senior housing providers, and our members care a lot about providing quality housing, including making sure that we're supporting survivors that fall under the VAWA category as best as possible. That said it, and others have said this, it's a considerable amount of work and time that goes into doing that in a supportive and trauma-informed way.

One thing that we've noticed that is happening in the Chicago area in Illinois their HUD office in partnership with community organizations has launched a Illinois VAWA emergency transfer pilot program, that I'm sure many on this call are aware of, that essentially adds some requirements but also adds a management fee add on for the property to be able to offset their expenses. That is something we're very excited to see how this pilot goes and many of our members are participating. And essentially by agreeing to have a lease addendum they agree to some more requirements, and they communicate that with residence, but then, in exchange, they also get the additional management add on fee. That's something we're very interested in seeing across the country.

Dr. Ruth Jones Nichols (HUD): Thank you so much for that input, Juliana.

Any other comments regarding this question, what are your recommendations for and concerns about reporting requirements and length of time for emergency transfers.

Debbie Piltch (Maloney Properties): Yeah. Hi, this is Debbie Piltch. I work for a large property management company. We do business in five States in addition to a lot of consulting across the country around VAWA and other issues like fair housing issues.

I think for me and for the organizations that I work with the big question is, what is the purpose of the reporting requirements? And what's the purpose of the information that's being gathered? Is it to assist in meeting the needs of survivors and analyzing the data in a way that we can then identify what are the barriers and how do we resolve them? Versus is it the stick for the property management company or a combination thereof. I think that as we track emergency transfers, and I couldn't agree more with Juliana, we're looking at a comparable pilot in Massachusetts. I think that the why's are going to be crucial; why are we doing this? What's the purpose? How are we going to use the information?

Because gathering information and requiring reporting for the sake of reporting doesn't make sense to a lot of us as owners and agents. Many are very committed to VAWA transfers but has been beautifully articulated on the call. There's going to be a huge diversion based on geography, administrative capacity, and other things about our ability to meet the needs of survivors. So, the question becomes for those entities that don't have the administrative and financial capacity, whether because they don't have the vouchers to offer or other resources, what are the alternatives? And how do we meet the survivors that those entities serve in an effective manner. Thank you.

Dr. Ruth Jones Nichols (HUD): Thank you, Debbie. I want to also acknowledge the additional comments that have been placed in the chat. Thank you to our stakeholders who have shared your input there.

[Comment from chat: As stated in 24 CFR 91.520, grantees (including state HFAs) receiving HUD awarded HOME, Housing Trust Fund, HOPWA, and ESG funds must report on emergency transfers requested under 24CFR 5.2005(e), and the outcomes of such request. What specific outcomes does HUD want to see from grantees/state HFAs? Could it be the following data points and how best to report this data to HUD. 1. Internal transfer: An internal transfer is a transfer within the same single or scattered site property in which the tenant requesting the transfer resides 2. External transfer: An external emergency transfer refers to a tenant's physical move out of the property in which he or she resides or out of a form of assistance, where the tenant would be categorized as a new applicant. 3. Safe unit: A victim determines whether the unit is safe.]

[Comment in the chat: Comment in the Chat: If the victim's information is meant to be confidential and private, why are we sharing the information and tracking it with HUD? Not everyone is going to want their information and reason for the transfer shared with others to see for a tracking purpose,]

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

Dr. Ruth Jones Nichols (HUD): We're going to move forward to the next area of focus. And the two questions we have, and we can share the questions on this screen if that will help as individuals are contemplating their input. The next area of focus is standards for corrective action plans and the first question is, please discuss your perspective about potential standards for corrective action plans whereby compliance standards have not been met. In addition to that, what standards for corrective action plans do you propose for VAWA compliance where standards have not been met?

Please feel free to raise your hand or turn on your camera so that we can see you.

Let's see a comment in the chat. Thank you for that.

[Comment in the chat: I'm wondering if anyone has considered working with other jurisdictions - in our Urban County for example, how would we 'enforce' or require different cities to be implementing something if our dollars are involved in a particular unit or set of units that we support?]

Dr. Ruth Jones Nichols (HUD): If there is a response to the second question, you can share your comment at this time as well. How can HUD work with housing providers to ensure that appropriate action is taken both proactively and reactively, while compliance standards are not being met?

[NO COMMENTS FROM PARTICIPANTS]

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

If there aren't any comments for those questions specifically, we'll move to our last area of focus and other issues related to HUD's implementation of VAWA housing provisions. The first question is a general question: Are there any other VAWA implementation or enforcement issues or recommendations that you would like to share with HUD today.

You can see the additional questions for this area of focus. So, we invite you at this time to raise your hand and come on camera, or you can simply turn your audio on to comment in response to one of these questions.

I'll share the questions once more.

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 updates and opportunities for engagement with you or the organization you represent?

What training programs or technical assistance would you recommend HUD offer to you or the organization you represent, to increase understanding about VAWA housing rights and obligations.

Finally, under VAWA 2022 Reauthorization, HUD must establish a gender-based violence prevention office. After it is established, what would you like to see the office do in the next 2-3 years? Janelle.

Janelle Scott (CLPHA): Thank you. So, in addition to having more guidance related to what's available to you if you don't have a voucher available, I think it's also helpful to provide more TA around working with victim service providers within the community. A lot of our members see themselves as being largely responsible for a lot of the VAWA activities, and they could be better supported within the community and not putting the onus on them to develop a partnership. So, I think it would be very helpful giving them TA to understand exactly what's available out there to help them when they get those calls in the middle of the night when they are not prepared to do so themselves.

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

Arlene (PHADA): Yes, thanks. I agree with what you know was just said. I think that housing authorities, especially the smaller ones, we represent all different sizes, but we do have a lot of small housing authorities, and a lot of them are in rural areas, so they don't even have the service providers that Janelle was alluding to that would be helpful for them to work with. I feel like sometimes they're just at a loss. They want to implement this as best as possible, but in their communities it's very difficult, to the extent that technical assistance could help with that.

It might mean, you know, referring people to somewhere that's further away if there were centers where a number of agencies could work with a centered area in a large geographic area. For example, we have one member who monitors two agencies that are 100 miles apart in Texas. So, even just managing a program is difficult. Now, add a layer on where you're trying to manage a complicated program like this and there aren't really any other service providers near her. So, you know she'd have to refer someone to a larger city in order to get extra services beyond those just through housing. So, I kind of feel like there needs to be more done with that. And maybe that happens through the field offices with HUD training with the field office level, because agencies do have a relationship with their field office.

I don't mean to say this as intended to be negative or critical, but just sometimes the field offices don't have the answers when agencies reach out to them.

So, you know, I don't imagine that HUD's going to be setting up centers that can help people, help agencies, or help clients with some of these issues. But I guess then my thinking is to the extent that field offices could do that or do it better, would be helpful to at least provide some levels of oversight and information.

When someone's in a small agency, they really don't know how to proceed, and have issues like Janelle said that they don't have a voucher available, they don't know where to send the family, there isn't any other housing that they have, no other public housing in that area that they can refer the family to, and there aren't interagency agreements. It's not like if I'm in one small agency in Texas, I can then send this person over to another small agency in Texas and say, 'Hey, can you help this person?' They have their own waiting list. What do you do? What if you don't have a voucher program?

And something came up when we were in the stages of looking at the original reauthorization bill which isn't the one, we ended up with. Oh, my goodness! We had so many organizations come together, and we were making a lot of headway, and we did discuss the issue. How will people get vouchers? At one point there was this discussion about having a centralized location where people could go to have a voucher issued to them and not rely on the housing authority and I just thought that was a great idea. I don't know how you do that yet. But that could be something for future discussion if HUD has more of these meetings, because there needs to be a place where clients who are in these dyer situations can go, and it's not always the local housing authority that can help them with that. So, those are kind of my off the top of my head, comments, and I appreciate it.

Dr. Ruth Jones Nichols (HUD): Thank you, Arlene and thank you to the additional individuals who have dropped their comments in the chat.

Juliana Bilowich (Leading Age): Yeah, thanks. Just a quick comment to support what Arlene and Janelle said and Janelle's comments on TA. I think TA would be helpful, especially for housing providers who are now newly covered by VAWA as a result of the recent reauthorizations, and so, having them have access to training and other materials to really get prepared at this stage would be very helpful.

Dr. Ruth Jones Nichols (HUD): Thank you. Are there other comments or responses.

Dr. Ruth Jones Nichols (HUD): If there aren't additional comments and responses to the questions at this time, we'd like to welcome your feedback on any other issues related to HUD's implementation of VAWA's housing provisions if we haven't already covered it and you'd like to share additional feedback. We welcome your feedback at this time.

Nancy Hogan (New England Management Housing Association): Dr. Nichols. Hi, I've been trying to raise my hand and I don't know what I'm doing wrong. But can you hear me? I'm calling as a member of the New England Affordable Housing Management Association and there are some of our members on this call as well. I was listening to the introduction and when Debbie Piltch had mentioned the purpose for which this information is being gathered, another person asked a question in if this is confidential information why is HUD collecting it? I was wondering are any of these questions going to be answered now? Or is this just you're taking the questions, and they will be answered later.

And then the other question I had would be about the frequency of the reporting. What is HUD envisioning in terms of managing agents, whether they be on the public housing side or the assisted side? What is HUD looking at in terms of the reporting requirements from housing providers?

Dr. Ruth Jones Nichols (HUD): Thank you, Nancy, for that feedback, and those questions. To clarify the purpose of today's consultation session is to gather input from our stakeholders that will help to inform regulations and related guidance for VAWA implementation of follow-up housing provisions, so we appreciate the questions and the comments that have been shared today, and we look forward to incorporating that feedback as we work to strengthen our implementation. We are not able to answer questions today, because we are still in a rule making phase. But this consultation session again will help us to inform our regulations and related guidance as we move forward.

Dr. Ruth Jones Nichols (HUD): I still see comments and questions going into the chat. So, if you need a little bit more time to think about how you might want to share your feedback. We certainly can afford more time for that, but again, I want to create space for individuals or organizations to share general feedback. If there's anything that you have prepared, or I would like to offer before we end the consultation session today.

Okay.

Dr. Ruth Jones Nichols (HUD): So once again we'd like to thank all of you for taking the time to participate in today's consultation session, and we look forward to engaging you in the future.

We will share more information and updates with you via email and thank you again for the opportunity to host this consultation this afternoon. With that we will say thank you and have a great rest of your day. Take care, bye.

[Additional Comments from the chat]

- It may be helpful to have a proposed policy to see how it may affect the providers and reporters. Training would also be helpful, especially for people who accept HCV because a lot of owners may not know what their obligations are as providers. in CA every owner much accept Section 8 and likely they would not know anything about compliance with VAWA.
- I would like to see potential guidance on what happens when multiple members of the same household ask for protection under VAWA.
- Training is key. HUD needs to provide detailed training on VAWA and the changes under VAWA 2022 - specifically as to required documentation from the survivor, response times for emergency transfer requests, and alternatives if an emergency transfer within your organization is not possible. I'm thinking specifically about non-PHA properties that don't have vouchers to offer a survivor if there isn't a unit available to transfer them to. We also need to know, as a previous comment states, how all housing providers will meet the reporting requirements.
- How can the process be simplified for victims, so they are not overwhelmed to the point they give up?