



October 7, 2013

Regulations Division  
Office of General Counsel  
Department of Housing and Urban Development  
451 7<sup>th</sup> Street, SW  
Room 10276  
Washington, DC 20410-0500

Docket No. FR-5720-N-01: The Violence Against Women Reauthorization Act of 2013

To Whom It May Concern:

On behalf of Enterprise Community Partners, I appreciate the opportunity to comment on the notice of the Violence Against Women Reauthorization Act of 2013 and its applicability to HUD programs. We commend HUD for providing this overview and calling attention to the impacted programs.

Over more than 30 years, Enterprise has created 300,000 homes, invested more than \$13.9 billion in communities, and touched millions of lives. We work with partners nationwide, creating and advocating for affordable homes in thriving neighborhoods—linked to jobs, good schools, health care, and transportation. We finance development, lend funds, and manage and build affordable housing, while shaping new strategies, solutions and policy. We have also invested millions in supportive housing and programs that provide transitional and permanent housing for survivors of domestic violence. Recognizing the importance of housing in helping individuals escape abusive environments and rebuild their lives, in a Huffington Post article in May 2013, our President & CEO Terri Ludwig publicly pledged to continue to work with lawmakers, service providers and our partners across the country to ensure that survivors of domestic violence have safe and stable places to call home.

We greatly appreciate the Obama Administration's commitment to this crucial program. The provisions that were extended and expanded in the Violence Against Women Reauthorization Act of 2013 are monumental and life-saving. We were particularly encouraged by the housing protections and greatly appreciate HUD's efforts to release this notice, as it represents an important step toward full implementation of the law.

In the notice, HUD specifically requests comments on what is considered a reasonable amount of time to find new housing or establish eligibility under another housing program. We understand the desire to establish uniform time periods to ensure that expectations are clear for both survivors and housing providers.

A system that focuses on activities and goals, not strict timelines, would better recognize the external and domestic violence-related barriers to housing. Instead of setting a time frame of sixty or ninety days, we recommend that HUD build flexibility into these requirements.

The demand for affordable housing far exceeds the existing supply across the country, particularly in dense, urban areas. It may be extraordinarily difficult for a public housing authority or other HUD-covered program to identify an available unit without an unreasonable and dangerous delay. It is also important to remember that emergency homeless shelters are not viable, long-term alternatives for re-housing domestic violence survivors. Shelters are often over-subscribed, frequently cannot keep mothers and sons together, and generally do not accommodate families well. We recommend a “housing first” approach—first securing placement for survivors in new, permanent housing and then gathering the necessary documentation. The Violence Against Women Reauthorization Act of 2013 has prioritized the safety of all survivors using federal housing programs, and new systems must consider the implications of housing shortages and shelter capacities. Housing providers should demonstrate that they are immediately and continually working to find new housing for a survivor in need, and provide updates on progress to both survivors and HUD.

Survivors may struggle to establish eligibility due to an inability to access necessary documents, like rental histories or social security information, which are often held or destroyed by an abuser. Survivors and housing providers should communicate on the status of obtaining documents and establishing eligibility, with additional assistance and support provided at every turn.

If an explicitly-defined time limit is necessary, however, we recommend that HUD allow housing providers to waive the requirement whenever needed if the obstacles cannot be addressed in a safe, timely manner. Parameters for the waivers could be set by HUD and based on data like low-vacancy rates, for example.

In the notice, HUD also requested comments on the emergency transfer plans. Since Enterprise is not a direct service provider, we defer to experts and our partners in the field to comment on the content and execution of these strategies. We regularly partner with housing authorities, local organizations, and other stakeholders, however, and we strongly recommend that HUD provide

adequate resources and capacity support to these entities that will be implementing the new requirements. Technical assistance and peer-to-peer learning opportunities, for example, would help to identify best practices and ensure the effectiveness and efficiency of emergency transfer plans.

Finally, we want to highlight how enthusiastic we are about the expansion of protections and rights to program participants of all federal housing programs. This expansion will require significant adjustment for many different programs and affiliated agencies. As the Administration considers and prepares materials and guidance, we are eager to share our perspective on key considerations for a range of programs, most notably the Low-Income Housing Tax Credit.

Thank you for your continued commitment to this vital program. We hope that our feedback will be useful to you and welcome any requests for additional information.

Sincerely,

Victoria Shire  
Vice President, Vulnerable Populations  
Enterprise Community Partners, Inc.