



# Policy Recommendations to Increase Safe Housing for Survivors

LEARNING FROM & LEVERAGING PUBLIC-PRIVATE PARTNERSHIPS

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## Preface

Thank you to the survivors, advocates, and allies who have shared their expertise and insights over the years and at this roundtable event. The solutions, recommendations, and changes that will come would not be possible without you.

## Introduction

On October 12-13, 2023, survivors, advocates, domestic and sexual violence coalitions, national housing experts, federal partners, and partners from public and private industries from across the country convened in Washington D.C. for a roundtable discussion on safe housing solutions for survivors of domestic and sexual violence.

The roundtable was hosted by the [Office of Family Violence Prevention Services](#), with coordination by the [STTARS Indigenous Safe Housing Center](#), the [National Resource Center on Domestic Violence \(NRC DV\)](#), and the [National Network to End Domestic Violence \(NNEDV\)](#). Federal partner attendees included staff from the Office on Management and Budget 0 to 5 Life Experience Team; the U.S. Department of Justice; the U.S. Department of Housing and Urban Development; and the U.S. Department of Health and Human Services.

Through a series of panel discussions, the day and a half event provided an opportunity for attendees to share, hear from, and connect with domestic and sexual violence survivors, advocates, community stakeholders, and national subject matter experts on public and private housing collaborations and innovations that have supported meeting the housing needs of survivors. Panel discussions included the Universe of Housing Options for Survivors; Indigenous Survivors' Access to On- and Off-Reservation Housing; Survivor Led Solutions; Public-Private Partnerships; and Looking Ahead: Solution Building and Next Steps.

## The Universe of Housing Needs and Current Options

Panelists launched the two-day event with a foundational “level-setting” of what survivors’ housing needs are in comparison to the current options that exist. This helped participants to enter the roundtable discussions from a shared point of understanding. Council members of the Ketchikan Indian Community and national training and technical assistance providers from the STTARS Indigenous Safe Housing Center, National Resource Center on Domestic Violence, and National Network to End Domestic Violence laid this foundation by responding to the critical question, “What are three things that you would like to bring into the room that speak to the differing needs of survivors?”

The panelists shared the overarching resources and strategies available for survivors who need housing supports – emergency shelter, transitional housing, rapid rehousing/DV housing first, permanent supportive housing, housing advocacy, legal protections, direct cash assistance and other economic supports. While housing is identified by survivors and advocates as one of the number one needs, over 50% of victims who identified a need for housing services did not receive them.<sup>1</sup> The consequences of housing insecurity are dire: women and men who experienced food insecurity or housing insecurity in the past 12 months had a significantly higher 12-month

prevalence of rape, physical violence, or stalking by an intimate partner compared to women and men who did not experience food insecurity or housing insecurity.<sup>ii</sup> As the lack of housing is linked to higher rates of intimate partner violence, the domestic violence field recognizes housing as a key violence prevention strategy. Additionally, housing as prevention strategy, to lessen harm and reduce further risk for survivors, is elevated in the U.S. National Plan to Address Gender Based Violence.

Both survivor-specific and broader barriers impact survivors' ability to secure safe, accessible, affordable housing in the aftermath of abuse. Research shows that survivors are reaching out to programs within their communities while they are currently in stable housing. However, while reaching out from within what would be termed "stable housing," they are still having trouble maintaining the housing. Current policies and definitions limit assistance options for survivors who do not fall within the parameters of "imminent danger," "attempting to flee" domestic violence, or literal homelessness. These types of policies and definitions do not recognize the life span impact that domestic violence can have on survivors' ability to retain or secure safe housing. This is particularly true in the connection between a survivor's ability to remain stably housed and their economic wellness being damaged because of the violence they've experienced. For example, a survivor who has been granted the right to remain in housing they formally shared with their partner would be considered stably housed. However, the survivors' experience of the home being in active foreclosure status coupled with their effort to retain the housing through credit cards or short-term, high interest loan arrangements, may be lost. Now carrying the burden of a negative credit status, the survivor also faces greater challenges accessing safe, accessible, and affordable housing. A survivor's struggles are further exacerbated by the utter lack of affordable housing within the United States generally. There are virtually no options for individuals within the 0-30% area median income (AMI) range, and the most at risk of eviction are children, especially those under the age of five.

The lack of housing inventory also greatly impacts the efficacy of certain solutions. Insights provided through a culturally specific lens highlighted that for communities of color, specifically Black communities, housing choice vouchers can often be a substandard solution. Due to the limited availability of affordable housing inventories where these resources can be used, Black communities often are disparately impacted. Naturally, this results in survivors having to move away from their known support systems to access affordable open housing. In addition to voucher use being limited, they are also limited in the number available. With these limitations and extensive wait lists, individuals who are eligible to receive housing choice vouchers often wait years before being able to secure one.

Domestic and sexual violence are consistently identified as significant factors in homelessness, especially for women, children, families, and particularly for LGBTQ+ and communities of color. Layered with oppressions such as racism and homophobia, the impact of homelessness and domestic and sexual violence is compounded for women of color and LGBTQI communities, particularly Native American women, African American women, and trans Black women.

Domestic violence is often life threatening. In the U.S., three women are killed each day by a former or current intimate partner. Survivors must often flee their homes to escape danger, yet do not have the means to secure affordable, permanent housing. When access to basic needs such as housing and safety are compromised, individuals can experience heightened risks of violence.



Advocates and survivors identify housing as a primary need of survivors and a critical component in survivors' long-term safety and stability.

Panelists reviewed the promising practices that emerged from new programs created by the American Rescue Plan Act (ARPA). Specifically, survivors were eligible for Emergency Housing Vouchers (EHVs). The program relies on collaborations between Public Housing Authorities (PHAs), Continuums of Care (CoCs), and victim service providers and culturally specific organizations (to provide referrals and services). The program has been successful in communities with strong collaborations between the entities. Similarly, HOME funds created in ARPA are working to create new housing and wraparound services. Panelists also brought forth deeper insights into the housing needs and solutions of Indigenous communities, centering equity and outlining ongoing disparities.

The need for safe, accessible, affordable, and sustainable housing is a grave concern for American Indian and Alaska Native (AI/AN) gender-based violence survivors, the advocates and service providers who seek to help them, and for their communities who value them.<sup>1</sup> This is especially true considering that domestic violence and sexual assault are leading causes of homelessness in most communities within the United States. The shelter and housing "crisis" in Indian country for AI/AN and other Indigenous peoples is nothing new. Access to land, safe housing and shelter issues have been present since Indigenous lifeways and tribal Nations were violated by colonization. A quick study on the eras of federal Indian law and policy makes it clear that inhumane practices towards AI/AN/Indigenous peoples and Indian Tribes have historically been the norm. Housing is certainly not an exception and the basic lack of housing for AI/AN people is factually the result of massive land theft, systemic removal, relocation and other intentional acts across the timeline of the United States' history. Thus, the housing crisis in Indian country must be viewed first as a historical injustice, one that has been utilized as a tool in the ongoing genocide of Indigenous populations. The same is true for the high incidence of gender-based violence in AI/AN populations. The housing crisis and the high rates of violence, lack of adequate resources and criminal justice response to violence across tribal nations and in communities where AI/AN people reside, cannot be viewed as randomized or even consequential occurrences, but rather as manifestations of a larger goal: the eradication of Indigenous people from their lands.<sup>2</sup>

According to the National Institute of Justice, more than 4 in 5 American Indian and Alaska Native women (84.3%) have experienced violence in their lifetime. This includes:

- 56.1 % who have experienced sexual violence
- 55.5 % who have experienced physical violence by an intimate partner
- 48.8 % who have experienced stalking
- 66.4 % who have experienced psychological aggression by an intimate partner

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[1] LaPorte, Caroline B., *The Violence Against Women Act Housing Provisions and Impacts to Indigenous Survivors of Domestic and Sexual Violence* (2022)(accessed from <https://www.niwrc.org/sites/default/files/VAWA%20Policy%20Paper.pdf>).

[2] LaPorte, Carolin B., *Intimate Partner Violence in Tribal Communities: Sovereignty, Self-Determination, and Framing* (2021).

Though Native women experience violence at incredibly disparate rates, it is just as alarming that only 38% of those women reported they were unable to access necessary services (such as shelter and legal assistance). Although there are 576 federally recognized Tribes, there are currently less than 50 tribal domestic violence shelters nationwide. Though federally recognized Tribes are distinct sovereigns within the United States, they lack a key function of that power: the ability to tax. Therefore, many Tribes lack the infrastructure that would allow for them to convert existing physical space to be utilized for shelter or transitional housing programs. Without the ability to use funds for construction (or even rehabbing existing space), Tribes wanting to start a domestic violence shelter or transitional housing program run into a near impossible hurdle.

In Indian country, the primary source of housing funding is from Indian Housing Block Grants which are authorized under the Native American Housing Assistance and Self Determination Act (NAHASDA), which is currently unauthorized.<sup>3</sup> Public-private partnerships are non-existent for the vast majority of the 229 Tribes in Alaska and for the Tribes in the lower 48.

For Alaska specifically, per HUD's Office of Native American Programs (ONAP), it costs approximately \$1 million to run a mile of infrastructure in the villages and the required infrastructure to utilize some of the public dollars available does not exist. Homelessness in Alaska often looks like it does for a lot of Indian country: doubled up and overcrowded.

## Survivor Leadership and Culture as the Compass of Response

Despite the immense housing needs and barriers that survivors face, many survivors have developed solutions in their communities and in collaboration with various public or private partners. Roundtable panelists shared a range of solutions, from designing programs that provide culturally responsive supports; to aid with safe housing retention; to reducing barriers to housing; to legislative change.

In Virginia, survivor advocate Kiesha Preston needed to find housing after ending her abusive relationship. She found that she was routinely denied housing due to her poor credit score (a result of the abuse). She worked with members of the Virginia legislature to pass the [Virginia Domestic Violence Victims Protection Act](#). The law requires landlords to consider an applicant's status as a victim of family violence with their application. A survivor can choose to submit specific types of documentation, along with their application for housing, to the landlord that would establish their status as a victim of family violence. The intention is to prevent landlords from arriving at an unfavorable conclusion of a survivor's ability to rent, when they'd otherwise be qualified, solely based on a low credit score. This survivor-led effort was a concrete, trauma-informed and equitable approach to generating housing solutions for survivors.

Responses grounded in cultural practice was another trauma-informed solution that emerged. Survivor activists shared that an ability to maintain cultural practice can be essential to healing and

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[3] NAIHC, NLIHC, and UNAHA, NAHASDA REAUTHORIZATION: CONGRESS MUST UPDATE AND FUND THE "BACKBONE OF INDIAN HOUSING" (2023) (accessed from: <https://nlihc.org/sites/default/files/2023-10/NAHASDA-reauthorization.pdf>)

safety, especially for Native survivors. The moderator asked panelists to reflect on and broaden what homelessness systems and gender-based violence advocacy movements should value as appropriate solutions. One panelist highlighted the value of encampments in providing a safe and tight-knit community for people experiencing homelessness, despite how society and systems stigmatize them. When people experiencing homelessness feel that housing responses such as shelter are not community-based, or relationships within support networks may be strained, there may be a greater sense of connectedness and community within this type of temporary option. These person-defined solutions also have connectedness to cultural practices, particularly for Native community members as noted by one Native survivor panelist. Embracing and funding models that preserve connection to community elders, center culture in community planning and design, and build service provider knowledge and capacity of cultural community dynamics and ways of being, can support Native survivors' resource-seeking behaviors and trust of systems.

Community built of people who identify as survivors was another theme that emerged during this panel. One panelist spoke of how cooperative models (co-ops) have been replicated by Latin@ and immigrant survivors in one Virginia community. Latin@ and immigrant survivors in this community face barriers to housing access such as the need for documentation to secure housing, application processes that do not honor oral traditions, economic barriers, racism, and sexism. To secure housing and build community despite these barriers, the survivors have designed economic justice co-ops and are currently exploring other co-op model concepts that would support access to safe, affordable housing.

In addition to the highlighted survivor-led solutions, panelists also made the following recommendations:

- Strengthen resource and training mechanisms which inform survivors of their housing rights and landlords of their responsibilities;
- Create more or scale up programs that support homeownership (e.g. housing choice voucher homeownership program, Habitat for Humanity models);
- Fund programs that support survivors' economic stability (e.g. direct cash assistance, match savings solutions such as the Assets for Independence Act);
- Ensure wraparound service supports are coupled with housing programming (e.g. substance use programming, childcare, legal assistance, transportation services); and
- Increase public and private housing education opportunities for communities to better understand what is available and ways to access.

## Housing Solutions Through Public and Private Partnerships

Like survivor advocacy, collaboration is also a key element in building housing solutions for survivors. The important role of housing advocates as key players in building public-partnerships was clear throughout the roundtable. In addition to survivors' leadership being at the forefront, domestic violence advocates also need to be part of the equation to build effective, survivor-centered, public-private partnerships. Domestic violence advocates can assess and convey survivors' needs; lead and carry out the work; and leverage state, tribal, and federal resources.

Domestic violence advocates' ability to convey survivors' needs, lead, and carry out the work on all levels was particularly critical during the COVID-19 public health emergency (the pandemic). Reports throughout the country noted rises in domestic violence during the pandemic. Calls to shelter in place along with limited housing options kept many survivors in very dangerous situations. The necessity to shift away from congregate housing approaches forced many communities to identify alternative and innovative housing solutions. Over the pandemic, domestic violence shelters have reduced their communal buildings' capacity and are using hotel/motel space, extended stay apartments, flexible funding and/or rental assistance to house survivors. Victim service providers have used and helped survivors access resources such as HUD Emergency Solutions Grants Program (ESG) "CARES Act," HUD ESG and CoC and permanent Emergency Housing and Stability Vouchers, Treasury Department Emergency Rental Assistance, VOCA, FVPSA, VAWA Transitional Housing and state, local and private funding to provide housing and assistance to survivors. Panelists shared how implementation of approaches such as mobile advocacy and use of resources to administer funds flexibly were instrumental in addressing the advocacy and housing safety needs of survivors during this time. As COVID-19 aid programs are sunsetting and the declaration of being in a public health emergency has sunset, advocates are seeing the flexibilities that existed also begin to go away.

In the height of the pandemic, the Domestic Violence Housing and Technical Assistance Consortium (DVHTAC) provided timely and strategic technical assistance and training to the field, helping countless communities shelter and house survivors and to pivot their programming overnight. DVHTAC began to host peer-to-peer learning communities that continue to convene, expanding our nation's pool of well-informed and connected housing advocates.

In response to the longstanding housing challenges survivors have faced, ZeroV, Kentucky's statewide domestic violence coalition, has leveraged a number of approaches and opportunities over the years to diversify housing solutions for survivors in Kentucky. Through initial use of the Assets for Independence program, ZeroV worked with over 200 survivors to become homeowners. Over time the organization has built relationships with developers to build tax credit housing units across Kentucky. They've also taken an approach referred to as "braiding funding" to provide housing resources such as rapid-rehousing programming. To support the housing sustainability of survivors, ZeroV coupled flexible funding approaches with their housing programs as well as provided supportive service resources through leveraged use of HUD funding. ZeroV has also engaged in eviction prevention efforts focused on survivors. In the Kentucky legislature, the organization has advocated for protections that would allow landlords to go after perpetrators who have caused property damage, rather than survivors who may be the lease holder. Despite these efforts, panelists noted that low affordable housing inventories still present one of the greatest barriers to identifying and securing permanent housing for survivors.

In addition to the highlighted DV housing advocates and private partner solutions shared, panelists also made the following recommendations:

- Streamline housing funding applications to make it less complex for community-based, culturally specific, and mainstream DV organizations to apply for funds;
- Invest in sustainable housing advocate roles;

- Minimize or outright eliminate match requirements as well as restrictions tied to some funding programs;
- Provide funding or incentives to increase the affordable housing stock across the country;
- Fund technical assistance that responds to emerging needs.

## Advancing Solutions through Policy Change and Resources

Many solutions emerged over the course of the two-day convening. This includes several policy recommendations which mirror recommendations national housing experts have uplifted over the years. STTARS, NRCDV and NNEDV make the following recommendations based upon the October 2023 Roundtable discussions, and the recommendations mirror themes we have identified in our housing work – including via STTARS Safe Housing Workgroup, NRCDV’s listening sessions, and NNEDV’s peer-to-peer coalition gatherings, as well as via the information we gather in our collaborative and individual technical assistance engagements. In addition to the recommendations mentioned in prior sections, the recommendations shared below are opportunities to move closer towards a whole government, interagency approach to addressing the housing needs of survivors.

### **Refrain from the criminalization of homelessness at every governmental level of law-making.**

Legislation that targets our unhoused population and further exacerbates their inability to acquire safe shelter or permanent housing should be avoided. [Housing Not Handcuffs](#), which is a campaign created by the National Homelessness Law Center and the National Coalition for the Homeless, calls for an immediate end to the criminalization of homelessness. Due to the nature of these laws, in that they are primarily drafted and adopted at the local level, Housing Not Handcuffs calls for rescinding or stopping the enforcement of all policies and practices that criminalize homelessness, to adopt constructive alternatives and to ensure the right to housing for all homeless and at-risk people. The campaign further calls for state governments to adopt laws that protect people experiencing homelessness from being impacted punitively for life-sustaining activities and to bolster or implement anti-discrimination and due process protections. Similarly, they call for the federal government to disincentivize criminalization of homelessness through its funding, regulatory and enforcement powers, to implement policies to prevent people from becoming homeless and to bolster or implement anti-discrimination laws and due process protections. The three National TA providers who worked to convene the roundtable, NRCDV, STTARS and NNEDV, concur and assert that for local and state governments, funding under any of these recommendations should be tied to the express repeal of any laws criminalizing homelessness or any life-sustaining activity of the unhoused (unauthorized use of public facilities, sharing food or resources with unhoused individuals, panhandling, trespass when clearly tied to homelessness, etc.).

### **Create low barrier access by incentivizing processes to screen in rather than screen out.**

The Federal, state and local governments should ensure low barrier access for unhoused individuals by incentivizing housing providers to create processes which screen in rather than out. Examples of this would be removing credit checks, reconsidering what types of convictions disqualify an individual from accessing housing, waiver of application fees, removal of policies that bar individuals



based on the structure of their family (those residing with them), removal of restrictions for individuals with a past eviction and so on.

### **Support meeting peoples' basic needs, starting with Universal Basic Income.**

STTARS, NRC DV and NNEDV support the implementation of Universal Basic Income broadly. For efficacy purposes, all three TA providers support the implementation of a pilot project so that survivors of domestic violence and sexual assault can access the funds necessary to meet their basic and safety needs. All Federally recognized Tribes and states/local governments should be eligible for the pilot.

### **Adequately fund tribal domestic violence shelters and identify/increase funds for development of physical space.**

Within Tribal Nations, the ability to operate shelter services, which are desperately needed according to STTARS work with survivors during their listening sessions, is severely hindered by a lack of funding for programming and for construction. American Indian and Alaska Native survivors need access to emergency shelter. Adequate funding for development of shelters and staffing of shelters is not only a persistent need, but an urgent and lifesaving one as well. Most federal funds that are utilized for shelter operation or other supportive services cannot be utilized for any development or even rehabilitation of existing spaces. This has resulted in less than fifty (50) Tribal domestic violence shelters, despite there being 576 Federally Recognized Tribes within the United States. Formula funding for Tribes should not operate as to bar Tribes with smaller populations from operating life-saving services that survivors need. Specifically, because of the Federal Trust Relationship, which is a fiduciary and legal obligation of the United States to Tribes, and due to the inability under current federal legal frameworks of Tribes to tax (despite being sovereign), federal funding restrictions on construction, development, and rehabilitation for Federally recognized Tribes under the Crime Victims Fund (VOCA), FVPSA, CoC and other funding streams should be removed. Alternatively, Tribes should be able to tax (as a fundamental exercise of Tribal sovereignty).

### **Abide by the Federal Trust Responsibility with Tribes, uphold and respect self-determination principles, and never implement rules or regulations absent meaningful, robust and consistent consultation as required by federal and treaty law.**

Though STTARS continues to uplift the survivor-centered practices found within the housing provisions of the Violence Against Women Act, where Tribes are ONLY utilizing NAHASDA dollars to implement tribal housing, Tribes should not be required to comply with the VAWA 2013 or 2022 iterations absent the negotiated rulemaking and consultation that NAHASDA mandates.<sup>4</sup>

First and foremost, Tribes are sovereign. HUD should not implement any rules without meaningful and consistent consultation with Indian Tribes and absent full compliance with NAHASDA and the Federal Trust Responsibility. Meaningful consultation occurs when the rules are reflective of the

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[4] STTARS, STTARS HUD CONSULTATION GUIDANCE (2022) (accessed from: <https://www.niwrc.org/sites/default/files/HUD%20Consultation.pdf>)

testimony provided, not merely a box indicating some form of consultation occurred. For more information, please see [STTARS HUD Consultation Guidance](#). At a minimum, policies enacted:

- Must consider the impact of the pandemic on AI/AN/NH survivors, Tribes, Tribal Housing Authorities and Tribally Designated Housing Authorities;
- Should be implemented concurrently with full and adequate funding for NAHASDA (funding which meets the trust relationship of the federal government to Tribes, meets the fiduciary standard, and addresses past funding disparities (which are severe));
- Must respect and prioritize the safety and cultural needs of AI/AN/NH survivors;
- Must respect and prioritize tribal self-determination;
- Must consider the historical and ongoing impacts of colonization on Tribal housing and access to safe housing and shelter for AI/AN/NH survivors;
- Must increase access to safe housing and shelter for AI/AN/NH survivors;
- Should create adequate funding sources for Tribes and Tribal programs to be able to build, staff, maintain and sustain domestic violence shelters;
- Should create incentives, but not penalties, for Tribes who implement policies that are consistent with VAWA 2013 and VAWA 2022;
- Should consider the diversity of Tribal communities, their unique needs and their many strengths;
- Should ensure funding for concurrent services for survivors that are culturally based;
- Should uphold NAHASDA;
- Must include the right to appeal;
- Should consider the unique geographic and existing infrastructure in Tribal communities; and
- Should not be implemented without adequate training and technical assistance to grantees.

**Invest \$5 million in creating a federal research program, under the Administration for Children and Families, Office on Family Violence Prevention and Services (OFVPS), that identifies, analyzes, and reports on existing services and programs most effective at supporting survivors from historically marginalized communities in exiting homelessness and maintaining housing.<sup>5</sup>**

A wide range of programs and services have been created to address the housing and homelessness needs of survivors. However, gaps remain in these programs addressing survivors' nuanced and

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[5] Morris, S. (2023, May 1). Learning from Lived Experiences Policy Solutions from Culturally Specific Communities to Increase Survivor Access to and Retention of Safe Housing. [https://safehousingpartnerships.org/. https://safehousingpartnerships.org/sites/default/files/2023-06/Learning\\_from\\_Lived\\_Experiences\\_policy\\_brief.pdf](https://safehousingpartnerships.org/sites/default/files/2023-06/Learning_from_Lived_Experiences_policy_brief.pdf)

diverse needs that honor their culture and identity. Investments in research that identifies existing services and programs, particularly culturally specific programs, most effective at supporting survivors from marginalized communities in exiting homelessness and maintaining housing, supports solutions that are equity-centered and evidence-based. Pillar 7, Objective 2.2 strategies of the National Plan to End Gender-Based Violence highlight the important role research and evaluation plays in building responses to ending or preventing gender-based violence around what works.

In addition to investing in the research and evaluation of effective solutions, investments should include resources that support the dissemination of information to funding recipients and communities at large to support awareness raising of the diversity in available approaches and solutions for survivors.

**Re-tool existing resources and create greater flexibility, within existing funding streams, towards use in building or rehabbing affordable permanent housing.<sup>6</sup>**

Survivors, communities, and organizations across the country continue to call forth the challenges of identifying safe, affordable, and accessible housing due to low housing inventories, economic hardships, and survivor-specific barriers to housing. To address these challenges, continued efforts to build upon existing action plans are needed. For example, solutions noted in the [2022 Housing Supply Action Plan](#) very much align with insights that were brought forth by roundtable participants. Additionally, investments in HOME programs, such as the \$1.8 billion proposed in FY24 to fund housing rehabilitation, reduce homeownership barriers, and invest in building affordable rental housing can support the expansion and creation of public and private initiatives, programs, designated set-asides, and other resources that are specifically designed to prepare and assist survivors with meeting permanent housing needs. Any absence of Tribal eligibility to access or receive these funding resources (e.g. HOME programs) should be remedied immediately.

**Ensure survivors have access to legal assistance.**

It is critical that survivors have access to legal representation in both eviction/related proceedings. The funds available to cover such assistance are either non-existent or capped via percentages. The VAWA Legal Assistance for Victims program should be substantially bolstered to help survivors assert their housing rights and avoid eviction, denial, and discrimination, address barriers to public benefits, and consumer rights issues, including coerced debt. Additionally, OVW's direct cash assistance program for survivors should be bolstered. Funding for the Tribal Governments Program under OVW should be significantly increased and should ensure that Tribal programs are not bound by percentage caps for legal assistance.

**Establish the Office of Gender-Based Violence Prevention at the U.S. Department of Housing and Urban Development (HUD), in the office of the Secretary at HUD.**

The Office will provide agency-wide leadership to ensure HUD's housing and homelessness

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[6] Morris, S. (2022, October 10). Emerging Solutions to Increasing Affordable Housing Options for Survivors. <https://safehousingpartnerships.org/>.

[https://safehousingpartnerships.org/sites/default/files/2023-06/Learning\\_from\\_Lived\\_Experiences\\_policy\\_brief.pdf](https://safehousingpartnerships.org/sites/default/files/2023-06/Learning_from_Lived_Experiences_policy_brief.pdf)

programs are survivor-centered and to enforce VAWA across the agency. The Office can lead amending guidance, directing training/technical assistance, and modifying funding announcements to reflect domestic and sexual violence survivors' unique safety, housing, and confidentiality needs. Consider adding a Tribal department under this office that would work with OFVPS Tribal Program Managers, Tribal Affairs at OVW and with Tribal interests at OVC (Office for Victims of Crime).

### **Create an interagency survivor housing program, housed at the Office on Family Violence Prevention and Services Office (OFVPS) at HHS (\$50 million).**

Build the capacity of local domestic, state, territorial, and tribal domestic violence programs to advance trauma-informed, culturally specific, confidential, safety-focused, affordable housing options for survivors by funding housing advocates and providing flexible funding. The program builds on key strategies identified at the Housing Roundtable and in the U.S. National Plan to End Gender-Based Violence (section 3.3.2). Key components of the program would include:

- Flexible and low-barrier resources for local domestic violence and culturally specific programs, state coalitions, Tribes, and tribal organizations to expand housing options for survivors;
- Responses that address survivors' urgent and diverse housing needs, including emergency shelter, advocacy and housing counseling, culturally specific services, interim housing, direct cash assistance, and resources to secure permanent housing options including mortgage assistance and housing counseling;
- Funding for local, culturally specific, state, territorial, Tribal and state DV advocates to work with local communities to identify opportunities to build and create permanent survivor housing. Housing advocates or navigators can leverage existing public and private resources to expand housing options for survivors (by engaging with housing counseling agencies, HOME fund allocations, legal assistance, mortgage support, vouchers, public housing authorities and more);
- Evaluation to demonstrate efficacy of housing interventions and flexibility;
- Low-barrier requirements to include broad survivor eligibility, no match for programs, direct cash assistance, and flexible use of the funds.
- Funding structure
  - Provide 25% of funds for culturally specific programs.
  - Provide 10% for Tribes.
  - Provide 10% for state/territorial/Tribal coalitions.
  - Provide 2% for training and technical assistance.

The program should incentivize communities, including private landlords, to create survivor-specific policies that address abuse-related barriers to housing such as criminal backgrounds, and poor rental and credit histories. The pilot should build on the strength of the evidence based DV Housing First model.



## Additional policies and resources:

- Roundtable participants lifted the strategies and encouraged the government to relaunch the federal Assets for Independence program at \$25 million as a tool for survivors to save for education and housing.
- Increase Family Violence Prevention and Services Act (FVPSA funds) to \$500 million and include direct cash assistance funds;
- Substantially increase investments in VAWA Transitional housing at the Office on Violence Against Women. OVW Transitional Housing program helps survivors with up to 24 months of assistance and most program participants exit the program to permanent housing and report feeling safer;
- Bolster HUD DV/SA Housing bonus funds to grow proportionally with HUD CoC funds, incentivize and prioritize funds for culturally specific and victim service provider organization, waive requirements that do not align with victim service provider mandates in other federal programs, simplify and clarify data collection and reporting requirements for victim service providers using comparable databases, and improve confidentiality throughout HUD's programs;
- Ensure steady funding from the Victims of Crime Act (VOCA), which has been a critical and flexible funding source for local victim service organizations in providing housing for survivors;
- Provide \$37.5 million, which translates to approximately 5,000 VAWA transfer vouchers, which would help keep survivors safe while reducing homelessness. VAWA 2013 and 2022 included a lifesaving emergency transfer provision for victims who need to flee their current housing. The law mandates that HUD devise procedures under which victims in assisted housing, who are requesting emergency transfers, can obtain vouchers;
- Provide \$20 million to implement VAWA and for DV training and technical assistance, including continuation and expansion of the Domestic Violence and Sexual Assault Housing and Technical Assistance Consortium, which has demonstrably expanded the field's capacity provide housing for survivors;
- Continued investment in stability/incremental housing choice vouchers to assist households who are homeless, including those fleeing or attempting to flee domestic violence, dating violence, sexual assault and stalking, or human trafficking;
- Develop housing eligibility waivers that can relax permanent housing eligibility requirements for trauma survivors such as victims of domestic and sexual violence. VAWA 2022 expanded the definition of fleeing or attempting to flee DV/SA/stalking and dating violence; HUD now needs to implement the expanded definition; other parts of the federal government are not bound by the HUD definition and should enact broad eligibility for their programs to help ensure that survivors are not screened out of programs.
- Implement and enforce VAWA and other housing rights and expand eligibility for housing by addressing barriers like immigration status (i.e., clarify noncitizen immigrant domestic violence survivors' access to housing), credit history, criminal background (promulgate regulations, fund strategic implementation and training, maintain TA funding). Implement VAWA at Treasury and

USDA, as well as HUD, and significantly strengthen guidance, training, and enforcement mechanisms to ensure full implementation of all VAWA housing provisions, including the emergency transfer process. As stated in the National Plan, (3.1.4) *Revise, update, establish, and evaluate housing policies and guidance that take into consideration the barriers experienced by survivors, such as housing discrimination, criminal records, no or poor credit histories, and prior evictions, in accessing and maintaining housing and homelessness assistance. Housing policies should be trauma-informed and victim-centered and follow a voluntary services model whereby housing is not contingent on service engagement.*

- Implement the amended definition of “homeless” under the McKinney-Vento Homeless Assistance Act, as provided by VAWA 2022, so that more survivors can access the Department of Housing and Urban Development (HUD) homeless assistance programs. Ensure that the two provisions stating, “has no other safe housing” and “lacks resources to obtain other safe permanent housing” does not minimize the impact of the expanded definition of “homeless.”
- *Morton v. Mancari* [417 U.S. 535 \(1974\)](#) should be codified to ensure that Indian preference remains intact. This way, Tribal Nations can continue to implement safe housing and shelter options both on and off reservation, while ensuring that American Indians and Alaska Natives have meaningful access to culturally generated and rooted programs and resources (e.g., Tribal programming or programs/services that are run by a Native not-for-profit).
- Invest in the broader housing infrastructure and address discrimination. Panelists and participants noted that the systemic issues in the broader housing landscape impact survivors’ ability to maintain and secure housing. In order to ensure access for survivors, the domestic violence movement supports investments in the broader housing infrastructure, which includes the maintenance and creation of housing stock and investments in housing vouchers and subsidies. Continue to implement Equal Access Rule and Affirmatively Furthering Fair Housing.
- Bolster economic justice for survivors as a critical strategy in the effort to ensure survivors can access housing. Policies and resources that support survivors in the workforce, with childcare, building and repairing credit, managing debt, developing financial literacy, accessing safety net benefits and direct cash assistance, and providing child tax credits – are all critical to ensure that survivors can obtain and maintain safe housing.

## Conclusion

A whole government approach to advance survivors’ access to housing, outlined in the U.S. National Plan to End Gender-Based Violence and reaffirmed by the Housing Roundtable is critical to prevent and end domestic violence. Evaluating effective strategies and investing in proven strategies across the federal government will help ensure that survivors in every community have access to safe, affordable housing as they rebuild their lives.

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## Appendix A

### What Excited Participants About Private-Public Partnerships

- Intentional and Culturally Rooted Design
- Flexible direct payments to survivors that would aid in the removal of complex eligibility requirements
- The possibility of strong and long-term positive outcomes for survivors
- The ability to remove requirements that utilize income guidelines as restrictions or bars to access
- The ability to remove restrictions around who can reside with a survivor in public housing
- The ability to house undocumented individuals
- Stability in operations and growth independent of fluctuations in state and federal funding for existing programming
- The possibility for a more holistic approach
- The ability to cater to unique needs/safe space
- The potential for access to capital for advocates, many of whom are survivors themselves, so that our advocates have access to basic needs as well (such as housing)
- Establishing affordable 3D housing construction that is composed of local materials to reduce the impact of the extractive industry
- The removal of time-limits on assistance
- The ability of survivors to live where they want to live
- Private-public partnerships provide the opportunity for cross-training, but certainly create a space for DV experts. Private sector has the ability to pay for this training
- Could create entrepreneurial programs within advocacy programs
- Could generate sources for down payment assistance, financial literacy programming, and IDA accounts
- Increase effectiveness of current federally funded housing solutions
- Could mitigate the risk of additional trauma through training and educational advocacy
- The ability to fund community level solutions, absent federal requirements, that center survivor autonomy
- Can utilize the business line item that the private sector has for community-based work and provides organizations and advocates with more ability to harness our power to get survivors what they need (based on what THEY say their needs are)
- Dignity in housing
- Trauma informed spaces that are well-funded
- Gives survivors the option to step out of congregate living

- The ability to be creative and generate options that can pivot based on a survivor's individual needs
- Avoid static funding
- The opportunity to make change at scale
- The chance to meet needs in a material and meaningful way
- The ability to adequately fund culturally supportive services
- A strengthened approach around health and well-being
- The ability to move away from the mindset of "who is worthy of housing" to a rights-based approach.
- The ability to pay advocates a living wage
- Flexibility in funding can remove immigration restrictions, which is essential for survivors of many communities



## Appendix B

### Participants had the Following Questions about Public-Private Partnerships

- How do you ensure that public-private partnerships continue to offer affordable and accessible solutions for long-term housing (e.g., past the period required to utilize tax breaks and other benefits conferred on private interests)?
- For Tribal, under Section 184 program, how can we get banks to adopt survivor centered policies that address the intersectional issue of economic/financial harm; how can we get them to address their harmful underwriting practices?
- How can special credit programs be used to increase home ownership opportunities for survivors, especially survivors of color and American Indian/Alaska Native survivors?
- How can we center a public health approach to housing in a capitalist system?
- For Tribal, how can we uplift best practices around sovereign immunity waivers that do not harm tribal sovereignty interests?
- How do we bundle funding?
- How can we best streamline eligibility across funding streams?
- How can we align/smooth reporting requirements that support work at the intersection of DV/Housing?
- How do we ensure the longevity of public-private partnerships if business priorities change or ownership changes?
- How can we leverage these partnerships to provide down payment assistance for affordable housing gaps, especially considering today's housing market?
- How can we create development teams within tribal communities? How can we uplift and support tribal organizations/Native organizations who are working within their tribal communities when private partnership funding is extremely limited on tribal land?
- For Native Hawaiians, under the Native Hawaiian Homes Commission Act, how can we get private interests to fix the serious gap in access that is generated by requiring the ability to put debt on land that Native Hawaiians are already owed?
- How do we lessen the qualifications for mortgage debt?
- Is there an opportunity to partner with community land trusts?
- What can we do around balloon mortgages, especially when they benefit private interests?
- How are advocates and programs connecting workforce development with housing to ensure long-term stability/permanence?
- Can we tax a percentage of private real estate transactions to create a housing fund specifically for public housing development and shelter development in underfunded areas and in Tribal Nations (which presently lack taxing authority).

## Appendix C

### Key Takeaways

Gaps in services in Indian Country

Survivors know what they need

Bring Survivor voices to the table

Tribes are sovereign and have a trust relationship with the federal gov

It is hard to get housing because you cannot find us.

Homeownership for survivors

Need for accessible permanent and safe housing

Be sensitive to other's past experiences and traumas

Listen to the people we are trying to help

Recognize the diversity of needs

Cannot make progress when serving only one side of DV issue

Box is oppressive and boring

We need to lean into the fact that we serve the unhoused

Section 8 vouchers can be used to pay mortgage

Voucher program is problematic because of housing inventory

Need for human centered research to better understand needs and HUD program design

In culturally specific communities, system harm is expected

Healing is no linear. Trauma lasts.

Resources in other communities

Housing Act of 1937

Equitable data collection is needed

Diverse needs require diverse responses

Accessibility to housing programs needs improvement

Compensate survivors

### Solutions

Know your resources and rights

Eliminate credit checks

Eliminate time restrictions for housing and shelter

Learning and staying informed of others cultures and practices

Contributing to society to improve/solve common issues

Homes can be funded for survivors via partnering with developers (tax incentive)

Connect with nearby hotels for relationships

Be sensitive to other's past experiences and traumas

I can create a housing program that is inter-generational

Engage with experts in development

Community Banking

Housing insecurity solutions should include survivor input

Work with developers

Survivors from marginalized communities should be included at the start

Look to culturally specific programming like Mother Nation

Flexible funding with less strings

Accountability for those who cause harm

Make the business case for serving others

Education for Tribes on applying for/management of FVPSA grants

Flexibility

Our solutions aren't always survivor solutions

Make funding available for Tribes

Partner with a Tribe

Compensate survivors

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