



NATIONAL NETWORK  
TO END DOMESTIC  
VIOLENCE

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February 24, 2014

**Docket No. FR-5690-N-18**

**60-Day Notice of Proposed Information Collection: Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking**

Dear Ms. Pollard:

Thank you for the opportunity to comment on the proposed information collection on the Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking (HUD Form 50066). In addition to modifying the form to comply with VAWA 2013, we have a few recommendations that should make the form more accurate and accessible.

#### **Terminology related to the four crimes**

When referencing an "incidence of" or the "effects of" the four crimes, each crime should be listed, not summarized with the term "abuse." For instance, in the following section, see the underlined phrases that refer to "abuse."

*2) Documentation signed by an employee, agent or volunteer of a victim service provider, an attorney or a medical professional, from whom the victim has sought assistance in addressing domestic violence, dating violence or stalking, or the effects of abuse, in which the professional attests under penalty of perjury (28 U.S.C. 1746) to the professional's belief that the incident or incidents in question are bona fide incidents of abuse, and the victim of domestic violence, dating violence, or stalking has signed or attested to the documentation.*

The term "victim" need not be modified by each crime in every instance.

#### **Information collection process**

We would recommend any changes to the information collection process be evaluated for potential risks to confidentiality and safety. We are concerned that *automated collection techniques* may encompass practices that expose personally identifying information to misuse and escalate safety risks. A secure process for automated collection should be developed to ensure privacy and minimize safety risks to the survivor. For example, we recommend that electronic submissions be done via an online webform rather than email as it is a safer and more private way to communicate electronically. We also recommend that survivors have proper notice to be fully informed of any privacy and safety risks associated with any online submission platform.

Thank you for this opportunity and please let me know if you have any questions. I can be reached at [mmclaughlin@nnedv.org](mailto:mmclaughlin@nnedv.org) or 202.543.5566 ext. 144.

Sincerely,

Monica McLaughlin  
Senior Public Policy Specialist