



December 29, 2022

Colette Pollard
Reports Management Officer, REE
Department of Housing and Urban Development
451 7th Street SW, Room 4176
Washington, DC 20410-5000

SUBMITTED VIA EMAIL (Colette.Pollard@hud.gov)

Re: OMB Control No.: 2577-0286 (60-Day Notice of Proposed Information Collection: Implementation of the Violence Against Women Reauthorization Act of 2013)

Dear Ms. Pollard:

I write to you on behalf of Home Forward, a Public Housing Authority (PHA) and largest provider of affordable housing in the state of Oregon. The mission of Home Forward is to assure that the people of the community are sheltered. Home Forward is submitting this public comment in response to the 60-Day Notice of Proposed Information Collection: Implementation of the Violence Against Women Act that was posted in the Federal Register at 87 FR 66723 on November 4, 2022. While Home Forward is generally supportive of the enhanced oversight of the critical protections afforded to survivors under VAWA outlined in this Notice, we request HUD's further consideration of the potential reporting outcomes and associated administrative burden of annual reporting as outlined below.

Requested Record Keeping and Potential Outcomes

We urge HUD to modify and/or clarify the proposed list of potential emergency transfer request outcomes. A clear definition is needed of what qualifies as an "Internal Transfer" and "External Transfer." For transfers outside of our portfolio, we do not have a meaningful way to track outcomes, especially if the information sought is related to the details (i.e. timing) of move-in. In addition, there are many circumstances outside of a housing providers control that could delay a move-in following the approval of an emergency transfer. For these reasons, we urge HUD to measure the length of time for an emergency transfer from the date of request to the date of approval/denial or the date of HCV issuance.

We also request that housing providers be given the opportunity to provide explanation of the circumstances that impacted the length of time for an emergency transfer. Each survivor's needs are unique and may present complexities that impact the length of time it takes a housing provider to approve an emergency transfer. This context is important to understand how well such requests are handled.

We have concerns regarding the protection of survivors' confidentiality when reporting emergency transfer outcomes on behalf of our contracted third-party property management companies and external partners. If implemented, we would seek guidance on how to navigate and protect survivors' confidentiality rights under VAWA when requesting, receiving, and reporting on this confidential information from outside companies and partners.

Administrative Burden

We believe that HUD's estimate of the administrative burden of the proposed collection of information and reporting is an underestimate. We anticipate that the proposed collection and reporting will take 3 to 8 hours per response per annum to assure data quality and consistency. In addition, the proposed information collection may require a separate system or require software adaptations to existing systems given the need to coordinate data collection with our contracted third-party property management companies which will require additional time and resources. We also request that the method for reporting this data to HUD be as streamlined as possible and not entail the utilization of a new system.

Thank you for the opportunity to comment. Please contact Christina Dirks, Interim Director of Policy and Planning, Home Forward at 503-348-1196 or christina.dirks@homeforward.org regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'C. Dirks', with a long horizontal flourish extending to the right.

Christina Dirks
Interim Director of Policy and Planning
Home Forward