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Docket No. FR-7061-N-18

January 3, 2023

Dear Ms. Pollard:

Below are comments from the Asian Pacific Institute on Gender-Based Violence in response to the U.S. Departments of Housing and Urban Development's (HUD) Information Collection Notice issued on Nov. 4, 2022, regarding HUD's implementation of the Violence Against Women Act ("VAWA"). API-GBV is a national resource center on domestic violence, sexual violence, trafficking, and other forms of gender-based violence in Asian and Pacific Islander and immigrant communities. API-GBV works in partnership with various national networks of advocates, community-based service programs, national and state organizations, legal, health, and mental health professionals, researchers, policy advocates, and activists from social justice organizations to better address the needs of Asian, Asian American, and Pacific Islander (AAPI) and immigrant victims. In addition, API-GBV analyzes critical issues, promotes culturally relevant evidence-informed intervention and prevention, provides consultation, technical assistance, and training; develops resources, conducts and disseminates research and impacts systems change in our work with federal agencies, state and local governments, foundations, and state and local organizations.

API-GBV endorses the comments provided by the Safe Housing Taskforce and echoes their recommendations. We provide additional specific feedback as follows:

**A. Strengthen the Accessibility of the VAWA Forms for Survivors Whose Primary Spoken Language is not English**

As recommended by the Safe Housing Taskforce, API-GBV reiterates the need for HUD to translate the VAWA forms into multiple languages. Not only does this allow survivors who do not speak, read, or write in English to obtain and complete the relevant forms to avail themselves of the VAWA protections, it helps reduce the burden placed on under-resourced culturally specific organizations to provide translation for agencies with significantly larger budgets and capacity. Specifically, API-GBV recommends that these forms be translated in the top 15 most commonly spoken languages *beyond English and in addition to Spanish*. Reference to the top languages identified languages in HUD's language access plan at [https://www.hud.gov/sites/dfiles/FHEO/documents/HUD\\_Language\\_Access\\_Plan.pdf](https://www.hud.gov/sites/dfiles/FHEO/documents/HUD_Language_Access_Plan.pdf) would be an important place to start.

In addition, to support access to these translated forms, especially for survivors who live in housing owned and operated by housing providers who fail to provide interpreters or translated forms for LEP survivors, notwithstanding their Title VI obligations, HUD should also translate the relevant portions of its website with links to the VAWA and other forms. OMB Policies for Federal Public Websites states that “your agency is already required to provide appropriate access for people with limited English proficiency by implementing Department of Justice guidance for [Executive Order 13166, “Improving Access to Services with Limited-English Proficiency”](#) (PDF, 6 pp, August 2000).

Further, HUD should disseminate the translated forms to its grantee housing providers and other stakeholders along with reminders of their obligations to provide language access as well as the updated guidance about VAWA protections. In particular, given the safety implications and potential life-threatening nature of domestic and sexual violence, there should be reminders about the need to provide interpretation or translation for survivors who speak languages of lesser diffusion (ie those beyond the top 15 spoken languages other than Spanish and English).

#### **B. Strengthen Access to Culturally Relevant Safety Planning As it relates to Housing.**

API-GBV urges HUD to strengthen its training related to the aforementioned forms to integrate safety planning and risk assessment, as well as incorporate the systems-generated risks for survivors in culturally specific communities, including language access barriers and other barriers related to increased dangers that survivors may face in particular cultural communities when taking steps to end the abusive relationship and establish safe housing.

As noted by the comments provided by the Safe Housing Taskforce, linkage to national hotlines is an important first step. We further urge stronger support for partnerships with advocates from culturally specific organizations that can help identify the unique issues facing survivors from specific cultural communities, such as racism, unique forms of isolation, or other issues such as possible lack of access to certain public programs or services, religious rules or practices, tribal jurisdiction, treaty or compact, or immigration status for certain communities, etc.)

#### **C. Conclusion**

Again, API-GBV reiterates the comments provided by the Safe Housing Taskforce. We urge HUD to incorporate the provided recommendations along with the aforementioned additions. Thank you for the opportunity to provide these comments and look forward to continuing to support HUD’s efforts to implement VAWA. Please feel free to contact me with any questions or concerns.

Sincerely,  
ASIAN PACIFIC INSTITUTE ON  
GENDER-BASED VIOLENCE



GRACE HUANG  
DIRECTOR OF POLICY