



Housing and services strategies *that work for people.*

August 15, 2024

Submitted via regulations.gov

Collette Pollard
Reports Management Officer, REE
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 8210
Washington, D.C. 20410-0500

RE: Docket No. FR-7080-N-31, 30-Day Notice of Proposed Information Collection: Implementation of the Violence Against Women Reauthorization Act of 2013; OMB Control No.: 2577-0286

Thank you for the opportunity to comment on the Department of Housing and Urban Development (HUD)'s *30-Day Notice of Proposed Information Collection: Implementation of the Violence Against Women Reauthorization Act of 2013; OMB Control No.: 2577-0286*. A national nonprofit organization based in Boston, Massachusetts, the Technical Assistance Collaborative (TAC) advances proven solutions to the housing and community support services needs of low-income people with disabilities and people who are experiencing or at risk of homelessness. We are dedicated to helping our nation's human services, health care, homelessness, and affordable housing systems implement policies and practices that empower people to live healthy, independent lives in the communities they choose.

We appreciate HUD's efforts collect information from stakeholders to ensure the VAWA forms and practices are as accessible, practical and efficient as possible. We especially note HUD's success with the Self-Certification Form 5382.

Please accept the following comments concerning the collection of information and specific ways to *enhance the quality, utility and clarity of information to be collected*.

VAWA Emergency Transfer Data Collection Form

- Questions 5bi and 11f, are checked if the housing provider was unable to reach the victim for follow-up. TAC recommends HUD specify a minimum number of contact attempts be added before a covered housing provider can check this box. TAC recommends a minimum of three (3) contact attempts is an appropriate number, balancing the need to reach the victim and other demands on the provider's time.

Model Emergency Transfer Plan Form 5381 and VAWA Notice of Occupancy Rights Form 5380

- In the Eligibility for Emergency Transfer section, TAC recommends drafting notes be added that a covered housing program may choose to increase the eligibility period for victims of sexual assault beyond the 90 day required minimum.
- In the Confidentiality section of both documents, TAC recommends explicit language be added

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that information about VAWA disclosures and emergency transfer requests should not be kept in shared tenant files, but instead kept in separate, locked files.

- In Form 5380, the chart outlining reasonable time for continued assistance to establish eligibility or move lists the Continuum of Care permanent supportive housing (PSH) program, but there is no mention of rapid rehousing (RRH) rental assistance. Was this omission intentional and if not, is there minimum guidance for RRH providers on reasonable time for continued assistance to establish eligibility or move?

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K Martone', with a stylized, cursive script.

Kevin Martone
Executive Director