



NATIONAL NETWORK
TO END DOMESTIC
VIOLENCE

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**Comments of the National Network to End Domestic Violence
Submitted to the United States Interagency Council on Homelessness,
Families with Children Workgroup
Federal Strategic Plan to End Homelessness**

The National Network to End Domestic Violence (NNEDV) is a social change organization dedicated to creating a social, political and economic environment in which violence against women no longer exists. We are the leading voice for domestic violence victims and advocates, particularly in the legislative and public policy arena. We are also a membership organization of state domestic violence coalitions, allied organizations and supportive individuals.

NNEDV is the technical assistance provider for two major grant programs through the federal Office on Violence Against Women – Grants to State Coalitions and the Transitional Housing Grant Program. Through this work and our membership base, NNEDV has the opportunity to work with service providers all over the country, and learn first hand the barriers facing victims as they try to establish safe and economically stable lives away from their abusers.

Strategies for Preventing and Ending Homelessness

1. Definition of Homelessness

Any thoughtful discussion of preventing and ending family homelessness must begin by clarifying the context of the problem. Without an accurate understanding of who homeless people are, how many homeless families exist, and what their needs are, strategies for addressing homelessness will forever fall short. To prevent and end family homelessness, the Federal Strategic Plan (FSP) must recognize and promote a broad and accurate definition of homelessness, reflective of the reality of all homeless families in this country.

The FSP will represent the efforts of multiple federal agencies, numerous constituencies, and diverse groups of advocates. Due to funding and other regulatory considerations, these stakeholders utilize divergent definitions of homelessness, each of which inevitably includes only a portion or sub-group of the greater whole. Currently, Continuum of Cares (CoC) are a primary vehicle for accessing federal funding and they rely solely on the Housing and Urban Development (HUD) definition of homelessness. This definition is exceedingly problematic as it is far too narrow to be broadly applicable. For example, many homeless families, of which a majority are domestic violence victims and their children, never access traditional emergency shelter or other mainstream supports. When shelters are full, many victims create precarious and often unsafe housing situations, including staying with friends or family or living in uninhabitable conditions. The HUD definition as used by CoCs does not capture these homeless families. Additionally, CoCs are by no means the only funding source for homeless intervention programs. The vast majority of domestic violence service providers are funded through Health and Human Services (HHS) and the Office on Violence Against Women (OVW), who share a common definition of homelessness with the Department of Education. Essentially, the accepted HUD definition of homelessness only captures a piece of the picture and by relying on it to the neglect of other definitions, large percentages of homeless populations are left out of the equation. The FSP must employ a definition which is inclusive of all homeless families and informed by the wide range of programs and advocates who serve them.

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2. Address the Causes not Symptoms of Homelessness

To truly eliminate homelessness the FSP must address its underlying causes and include comprehensive anti-poverty strategies. Homelessness is not simply a lack of housing but instead the consequence of a complex lack of resources, safety and basic necessities. Historically, efforts to prevent and eliminate homelessness have narrowly focused on the symptom of not having a home or behavioral issues that sometimes arise in concert with homelessness (e.g. substance abuse). As a result, programs and funding are designed for homeless sub-populations and target certain symptoms, but ignore the underlying causes. Sustainable reduction in rates of homelessness will not be achieved unless we address the reasons families become homeless. The FSP must incorporate strategies to provide families adequate access to healthcare, opportunities for education and income, and of course, housing.

Domestic violence is a leading cause of homelessness for women and children (families) in the United States. In some states, upwards of 50% of the general homeless shelter clientele identify domestic violence as the primary reason for homelessness. More than 90% of homeless women report having experienced severe physical or sexual abuse at some point in their lives, and women head over 75% of families living in subsidized public housing. The relationship between domestic violence and homelessness can be complicated. Many victims must leave their home in order to escape the violence but do not have the income to support themselves. Others are wrongly evicted from housing due to their batterer's disruptive and often criminal behavior. Additionally, many abusers use financial abuse to control their victims, leaving victims with terrible credit and rental histories, further impeding their access to affordable housing.

A national plan to end homelessness must recognize survivors' unique needs, protect and enforce their rights, and dedicate adequate resources to domestic violence prevention and intervention. Because such a large percentage of homeless families have experienced domestic violence as an underlying cause, addressing the complex needs of victims serves to also address and prevent childhood, chronic and intergenerational homelessness.

3. Increase Funding for Effective Programs

While many homeless families do not access mainstream services, many do. Domestic violence shelters, transitional housing programs and the federal Housing Choice Voucher (Section 8) program have seen significant increased demand over the past few years. Yet, as demand increases, funding for these life saving programs has stagnated. In one day in 2006 domestic violence shelters reported 5000 requests for services went unmet. A similar study in 2009 revealed more than 9,000 requests for assistance went unmet. Further, in a recent informal survey of transitional housing grantees, programs reported facing serious funding cuts, a reduction in services provided and an increase in demand. More than half of the respondents said there were no Section 8 vouchers available in their area; either the vouchers did not exist or the waiting list was so long (often upwards of 8 years) it simply wasn't an option. Simultaneously, with unemployment on the rise, fewer survivors are able to secure jobs and pay rent outside of the abusive relationship. They must often choose between homelessness and living in danger. Funding cuts have an impact on many social service providers, exacerbating the impact of the loss of services. Programs report families are staying longer in shelter, the community organizations with which they partner are at capacity, and families must wait longer to receive even basic supports.

While many of the United State's strategies to end homelessness over the past decade have been incomplete, not every wheel must be re-invented. Increasing federal funding, specifically under the Family Violence Prevention and Services Act (FVPSA), administered by HHS, the OVW Transitional Housing program, and Section 8, will allow local organizations to provide vital housing options to families and therefore must be prioritized.

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Best Practices and Barriers

1. Flexible, Individualized Services

The best and most effective responses to homeless families are those that are individualized and flexible, to meet the unique needs of each family. For over four years, OVW has required its funded transitional housing grantees to offer services on a voluntary basis, to ensure each survivor can partake in the services and supports that most fully match her needs and wants. In short, eligibility for housing assistance is not contingent upon an individual's participation in specific support services. Anecdotal evidence from the more than 150 programs funded under this grant indicates that the more flexible a program, the more likely participants will take advantage of support services. The fewer the rules and restrictions, particularly those perceived to be arbitrary and not related to the family's cause of homelessness, the more likely the family will establish a relationship with the provider and ultimately gain access to the support needed to move beyond homelessness. Homeless service providers report similar findings and identify flexible, accommodating programming as most effective in meeting families' needs.

The lack of coordination among federal agencies, particularly those that administer funding streams such as HUD, Department of Justice (DOJ) and HHS, is a significant barrier to these best practices. Because these agencies often have conflicting programmatic and data collection requirements, many domestic violence providers are unable to access the full range of funding. Alternatively, service providers that do receive funding from multiple sources are often forced to create parallel services that mirror each other but operate with different rules and policies. This is resource-intensive, creates confusion and unequal access among service participants, and ultimately means fewer homeless families receive assistance.

2. Housing Protections for Domestic Violence Victims

Eliminating discrimination against individuals based on their status as domestic victims is a crucial strategy in ending homelessness. Landmark housing provisions passed in the 2005 Violence Against Women Act (VAWA) protect victims from housing discrimination; allow victims to access the criminal justice system while maintaining their housing; allow public housing authorities (PHAs) to prioritize victims for housing when their safety dictates it; prohibit PHAs from denying housing or evicting a victim based solely on grounds of domestic violence; and clarify the portability of vouchers for victims in the Section 8 program.

If implemented fully, these protections will help families access federally subsidized housing and importantly, sustain that housing. Ultimately these provisions can help save lives and prevent homelessness. Unfortunately, lack of coordination at the federal level and particularly a lack of guidance from HUD to local PHAs, has led to inconsistent implementation and enforcement of the VAWA protections. Victims continue to be illegally denied or evicted from housing, which significantly interferes with their ability to maintain family stability and safety. Clear and consistent guidance must be expected from the federal level, through increased coordination between HUD and OVW.

Effective Federal Government Programs and Strategies for Improvement

1. Housing Choice Voucher Program (Section 8)

Section 8 is a critical homelessness prevention program for families, providing essential rent subsidies while allowing participants the freedom to choose a safe community to live in. As mentioned, the program is severely under-funded. Additional and sustained funding is necessary to ensure communities have vouchers available and homeless victims and their children are not forced to return to their abuser.

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2. OVW Transitional Housing (TH) Grant Program

The TH grant, funded through VAWA and administered by OVW (DOJ), has provided effective homeless intervention for the past five years. Communities report these services are essential to their ability to help victims stay safe, by providing an alternative to homelessness or returning to the abusive household. Typically transitional housing services are offered for up to two years, affording victims the time and support services necessary to access additional education, secure employment, and increase their economic stability. However, programs report long wait lists for services and not enough funding to meet the growing need. Further, the grant only provides intervention once a victim is already homeless. This Program would be greatly strengthened by allowing programs to assist victims in their existing homes, if they are facing impending homelessness as a result of the violence.

3. Earned Income Tax Credit (EITC)

Increasing income for poor families is an obvious and effective tactic for addressing homelessness. The EITC is a proven anti-poverty strategy that helps families achieve economic stability by offsetting payroll and income tax burdens, and by providing income supplements to very low wage earners. The EITC also appears to create an incentive for people to leave welfare for work and for the working poor to work full-time when possible. In 2009, the EITC helped lift an estimated 6.6 million people, including 3.3 million children, out of poverty. Further, because receiving the EITC does not make a family ineligible for other types of federal assistance, the net gain is great. Unfortunately, each year several million eligible workers do not claim the EITC. Information about this important program must be more uniformly distributed among local communities and to programs serving low-income and poor workers. The existing partnership between the Internal Revenue Service and HUD must be strengthened and encouraged, to ensure that all eligible workers can claim these benefits.

4. Greater Federal Coordination

It cannot be overstated - the general lack of coordination and collaboration among federal agencies creates a significant and discouraging barrier to ending homelessness in this country. This lack of coordination creates inconsistent access to federal funding, poor implementation of critical legal protections for domestic violence victims, and increased administrative burdens for already taxed local service providers. Greater coordination across federal agencies such as Commerce, Labor, Transportation, Education, HHS, HUD and DOJ would enhance victim safety, increase access to critical services such as childcare, transportation, employment and housing, and ultimately enhance efforts to eliminate family homelessness.

Conclusion

The United States is not adequately addressing the complex needs of homeless families. With the renewed energy for an effective Federal Strategic Plan to eliminate homelessness, we are poised to make a real and sustainable difference. However, we cannot effectively tackle homelessness without addressing its causes, and we will not end family homelessness unless we adequately address domestic violence and the needs of victims. A combination of federal coordination, proven anti-poverty strategies, protections for victims, and increased funding for anti-homelessness programs represents the beginning to a successful campaign against family homelessness. Together we can ultimately ensure that all people have access to safe and affordable housing and economic stability. I appreciate the time and attention you are dedicating, and offer the National Network to End Domestic Violence as your ally. Please call upon us if we can be of any assistance in the upcoming weeks and in the future.

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