

# Office of Children and Family Services

**ANDREW M. CUOMO**Governor

**SAMUEL D. ROBERTS**Commissioner

**SHEILA J. POOLE** Acting Commissioner

# **Informational Letter**

# Section 1

Transmittal:	18-OCFS-INF-03/18-OTDA-INF-11				
To:	Commissioners of Social Services				
	Executive Directors of Residential and Non-Residential Programs for Victims				
	of Domestic Violence				
	Continuum of Care Coordinators				
	(or other specific types of agencies)				
Issuing	Child Welfare and Community Services				
Division/Office:	·				
Date:	July 18, 2018				
Subject:	Best Practice Guidance on the U. S. Department Housing and Urban				
	Development's (HUD) Coordinated Entry Process for Victims of Domestic				
	Violence to Access Homeless Housing Resources				
Suggested	Regional Office Directors				
Distribution:	Directors of Social Services				
	Temporary Assistance Directors				
Contact	Pamela.Jobin@ocfs.ny.gov				
Person(s):					
Attachments:	Attachment A - Coordinated Entry: Confidentiality Requirements in Practice,				
	from the National Network to End Domestic Violence				
Attachment Available Online:					

# **Filing References**

Previous ADMs/INFs	Releases Cancelled	Dept. Regs.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.
		18 NYCRR 452.10	42 USC 10406(c)(5)( D)(i), 34 USC 12291(b)(2)		

#### Section 2

## I. Purpose

The purpose of this Informational Letter (INF) is to transmit to domestic violence services providers best practice guidance issued by the National Network to End Domestic Violence (NNEDV)<sup>1</sup>. The guidance pertains to the U.S. Department of Housing and Urban Development's (HUD) coordinated entry process for victims of domestic violence to access homeless housing resources.

# II. Background

According to the National Law Center on Homelessness and Poverty, violence against women is a leading cause of homelessness. In 2012, the U.S. Department of Housing and Urban Development (HUD) implemented the Continuum of Care (CoC) Program to assist persons experiencing homelessness to be housed as quickly as possible. The CoC Program is designed to promote community-wide planning and strategic use of resources to address homelessness, allowing each community to tailor its program to the strengths and challenges of that community.

In 2017, the Notice of Funding Availability (NOFA) for the CoC Program highlighted the need to engage domestic violence providers to assist communities in efforts to end homelessness for victims of domestic violence. It is anticipated that the 2018 NOFA from HUD will include \$50 million earmarked for domestic violence rapid rehousing to be distributed through the CoC process.

A coordinated entry process for housing for domestic violence survivors can be challenging because federal laws, including the Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA), prohibit domestic violence services providers from entering personally identifying information about victims of domestic violence into the Homeless Management Information System (HMIS). HMIS, the federally mandated database, includes as required data elements name, social security, and date of birth. This presents a challenge to programs providing services to victims of domestic violence, which are prohibited by law from entering personally identifying information for victims of domestic violence into HMIS or any other by-name housing registries.

To assist domestic violence service providers who are participating in the HUD CoC Program in complying with VAWA and FVPSA requirements and continuing to provide safe and confidential services to victims of domestic violence, the NNEDV has developed best practice guidance (Attachment A).

This document should be used as a tool by domestic violence service providers seeking to participate in the CoC Program to allow victims of domestic violence to access safe, affordable housing.

<sup>1</sup> NNEDV is a technical assistance provider of the U.S. Department of Justice Office of Violence Against Women grant programs and supports domestic violence service providers and state domestic violence coalitions in their critical work of supporting victim safety, holding perpetrators accountable, and ending violence.

# **III. Program Implications**

It is anticipated that HUD will be issuing a Notice of Funding Availability soon that will include \$50 million for rapid rehousing for victims of domestic violence through the CoC Program. Recipients of COC's funds should work with domestic violence service providers in their community and use the attached best practice guidance to provide access to homeless housing resources for domestic violence victims while maintaining compliance with VAWA and FVPSA.

### For more information regarding Continuum of Care and homelessness assistance see below:

https://www.hudexchange.info/resources/documents/Notice-CPD-17-01-Establishing-Additional-Requirements-or-a-Continuum-of-care-Centralized-or-Coordinated-Assessment-System.pdf

https://www.hudexchange.info/resources/documents/Coordinated-Entry-and-HMIS-FAQs.pdf

https://www.hudexchange.info/homelessness-assistance/

/s/ Laura M. Velez

Issued by:

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Division/Office: Child Welfare and Community Services

/s/ Nancy P. Maney

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