

AFSSA is a 501(c)3 agency based in Austin, Texas. For more than 25 years, we have supported survivors of domestic violence, sexual assault, and trafficking; though AFSSA serves clients from all backgrounds, our expertise is working with survivors from immigrant communities.

AFSSA opposes the proposed rule changes because they will further endanger a vulnerable population: immigrant survivors of domestic violence, sexual assault, and trafficking. Immigrant survivors already face unique barriers when seeking safety from abuse, along with limited access to services. The changes regarding verification of eligible status would deny survivors yet another option when attempting to leave an abusive situation, effectively forcing them to choose between homelessness and staying with their abusers.

We urge the rule to be withdrawn in its entirety, and that HUD's long-standing regulations continue to remain in effect.

Those already living in subsidized housing who are evicted and forced to return to a violent home will face an even greater risk to their safety. It is commonly known that the danger to a victim actually increases once she escapes, with one estimate noting a 75% increase in violence for at least two years following an escape. This includes increased risk of fatality.

Financial security, and affordable housing in particular, are critical to increasing survivors' chances of escape, recovery, and prevention of future abuse. Strikingly, domestic violence, including sexual abuse, is reported as the acute cause of homelessness among 22% to 57% of all homeless women. According to the Centers for Disease Control and Prevention, over half of all female lifetime victims of intimate partner abuse - including rape, other physical violence, and stalking - did not receive housing services after requesting them. The National Network to End Domestic Violence reports that 65% of victims' average daily unmet requests for help from domestic violence programs nationwide are for housing-related services. Survivors of sexual assault note that if they do not have housing, then other auxiliary services are only minimally helpful. Housing can be determinative as to whether a survivor can escape an abusive intimate partner or employer in many cases.

Violent perpetrators are well-aware of the link between a victim's financial independence and her access to safety. Three-quarters of women report staying in an abusive relationship due to economic barriers. Financial abuse is extremely common in intimate partner violence (IPV) relationships with between 94% and 99% of survivors of IPV reporting experiencing financial abuse. Abusers will keep financial information from survivors, ruin credit, interfere with the survivors' employment through threats and tactics to hinder the survivor from going to work, and more. Having access to housing assistance helps survivors afford to leave abusive relationships and keep themselves and their families safe and housed.

Securing non-subsidized housing is also extremely difficult for survivors across the country. There is a national shortage of low-cost rental units, with only 37 units available per 100 extremely low-income (ELI) households. The situation is even worse in the Austin/Round Rock metro area where there are just 21 units per 100 ELI households and 92% of ELI households are cost-burdened. For immigrant survivors just attaining some measure of financial independence, subsidized housing could be the only way to move out of a shelter and gain stability--and then, perhaps, proceed to life in an independent, non-subsidized home.

Survivors who have assisted law enforcement with pursuing prosecution of a perpetrator may find themselves homeless when the perpetrator is deported and no longer contributing to rental payments. Through the Victims of Trafficking and Violence Protection Act of 2000, Congress intended to protect survivors in this situation. Yet, unless and until they have secured lawful permanent residence, the proposed rule will cruelly punish such survivors through eviction and homelessness. Homelessness must not be the only alternative for survivors contemplating escape from violence. This fear of homelessness will also dissuade survivors from reporting to the police, eroding trust in law enforcement while threatening public safety as abusers continue to perpetrate crimes within communities.

We have additional points and references detailed in the attached file. Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact us for further information.

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