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HUD'S CONSOLIDATED PLAN: AN EFFECTIVE AVENUE FOR DOMESTIC VIOLENCE HOUSING ADVOCACY?

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THIS PROJECT IS DEDICATED TO THE DOMESTIC VIOLENCE ADVOCATES DOING THE
INCREDIBLY DIFFICULT WORK OF EMPOWERING SURVIVORS TO THRIVE WHEN OUR
SYSTEMS PREFER THEM TO COWER.

AND TO THE TEAM AT WISE IN LEBENANON NEW HAMPSHIRE, WHO WELCOMED ME
INTO THIS FIELD WITH OPEN ARMS.

A NOTE ON LANGUAGE

While the terms domestic violence (DV) and intimate partner violence (IPV), are both used to describe a variety of abusive experiences, the public health field utilizes IPV to refer to specific types of violence between romantic partners. DV is more widely used in the field of service providers and state coalitions to refer to a broader range of experiences related to coercive control. This report will generally utilize DV, but will also refer to IPV when discussing specific statistics and reports that rely on that definition.

There is not consensus in the literature or in practice around the usage of the terms: victim and survivor. These terms can feel quite charged and when working directly with someone who has experienced IPV the preference is to mirror the terminology that person uses to describe their own lived experience. This is not possible when discussing the literature, so this proposal will use the term survivor when possible to refer to a person who has survived a past incident of IPV.

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Introduction

Housing is foundational to our wellbeing. Not only is housing a basic human need but, in addition to sheltering us from the elements, our homes provide comfort, safety, and a sense of belonging. For many, housing also represents an opportunity to build wealth and contribute to their future financial stability. For people who own their homes or easily pay their rent, having housing may not seem like a luxury, but for many people across the country affordable housing is of critical importance. In the case of those experiencing domestic violence, the availability of affordable housing can be a matter of life or death.

Domestic violence, sometimes called intimate partner violence, is an epidemic. It impacts far more people than most would like to admit. On just one day in 2019, more than seventy-seven thousand survivors of domestic violence were served by domestic violence organizations across the country. Despite the prevalence of domestic violence, the dynamics of abuse are often misunderstood by the general public. “Why don’t you just leave?” is a common question levied at individuals, especially women, that are experiencing abuse. And while this question is often genuinely asked, it suggests an ease in leaving that few survivors, especially female survivors, have the privilege of experiencing. Safe and affordable housing is difficult to come by for many, not just survivors. In an increasingly tight and unaffordable national housing market, the domestic violence housing system, which relies on emergency shelters to provide temporary housing until a long-term solution is identified, doesn’t work. Survivor housing is about more than providing emergency shelter; instead, survivor housing solutions require housing supports that link more directly to the broader affordable housing ecosystem. As the domestic violence movement continues to reimagine and expand its housing advocacy efforts, it is important that advocates and leaders understand and engage with affordable housing programs and practices outside of the domestic violence system.

There are few funding sources directly devoted to housing for survivors. As a result, domestic violence organizations must engage a larger housing ecosystem with other nonprofits and advocacy groups to access much needed resources. Recently, the domestic violence and homelessness systems have begun to work more collaboratively, finding innovative ways to support one another as well as survivors. While engagement with the homeless system has yielded positive results, many domestic violence organizations have not expanded their advocacy efforts to other housing systems, shying away from the often-intense application and reporting requirements of federal grants. As the domestic violence movement continues to expand and strengthen its housing work, HUD’s Consolidated Plan presents an underappreciated and largely untapped opportunity for engagement with the larger affordable housing system.

The Consolidated Plan (ConPlan) is a long-term planning process required as part of the distribution of a number of large HUD grants. While the ConPlan does not directly dictate

how these funds are distributed, it does set the priorities and eligible uses for a large pool of housing funding in a given community or region. As such, the ConPlan represents an opportunity for domestic violence coalitions and service providers to further engage in housing systems where they may not already have an established presence. Still, limitations on time and resources across the domestic violence system require that any new systems-level engagement demonstrate a return on investment at least proportional to the resources required to participate. While the ConPlan makes up the planning backbone for the distribution of a number of federal housing funds, there has yet to be a thorough investigation into the potential benefits and challenges associated with participation in this process for DV organizations.

Given the enormous potential presented by engagement with a highly-regulated and often-overlooked bureaucratic process such as the ConPlan, the following report investigates if and how domestic violence organizations might leverage the ConPlan to achieve their goals. Before delving into the case study, **Section I** provides an overview of the dynamics of abuse, shedding light on the ways in which housing has both the capacity to create avenues for continued abuse or opportunities for survivor empowerment. Grounded in this understanding of abuse, **Section II** describes the history of domestic violence housing systems and the ways in which the domestic violence movement has grown and evolved within and outside of “mainstream” housing programs. **Section III** looks more closely at the ConPlan itself. This section discusses the ConPlan’s regulations and processes that provide opportunities for expanded participation among domestic violence agencies, and is followed by the **Kentucky ConPlan Case Study**. The paper ends with a discussion of **Key Findings and Takeaways**, and a discussion **Limitations and Opportunities for Future Research**. Finally, while not part of the primary case study analysis, additional research was conducted featuring the Delaware Coalition Against Domestic Violence (DCADV). DCADV serves as a sort of hypothetical application exercise, laying out how and why DCADV could engage with the ConPlan. This **Application Exercise with the Delaware Coalition** can be found in Appendix B.

Domestic violence is not a siloed phenomenon experienced by one type of person, and housing solutions for domestic violence must expand into the general affordable housing realm in order to truly serve survivors needs. In doing so, there is enormous potential for domestic violence organizations to become leaders in the affordable housing system, creating housing options that benefit survivors and contribute to the creation of a future without violence.

Section I: Dynamics of Abuse

To understand the urgency and intensity of survivor housing needs, it is important to first understand the dynamics of abuse and how they contribute to housing insecurity, before, during, and after the period of abuse. Abusive relationships are more complicated, nuanced and prevalent than the public usually prefers to admit. In the popular imagination, domestic abuse is easy to identify due to its inherent violence, and easy to leave due to its general unacceptableness. But domestic violence, also commonly referred to as intimate partner violence, is more broadly defined by the National Coalition Against Domestic Violence as:

“willful intimidation, physical assault, battery, sexual assault, and/or other abusive behavior as part of a systematic pattern of power and control perpetrated by one intimate partner against another.”

This definition moves past typical stereotypes of abuse, by focusing instead on the concept of coercive control. The theory of coercive control attempts to explain the underlying dynamics of domestic violence and was detailed by Evan Stark in his 2007 book entitled: “Coercive Control: How Men Entrap Women in Personal Life”. Through this framework, Stark recontextualizes domestic violence, demonstrating that it is not uniquely domestic or inherently violent, but instead a pattern of “calculated, malevolent conduct deployed almost exclusively by men to dominate individual women by interweaving repeated physical abuse with three equally important tactics: intimidation, isolation, and control” (Stark, 2007).

FIGURE 1: DULUTH MODEL POWER AND CONTROL WHEEL



The theory of coercive control clearly aligns with the Power and Control Wheel, (Figure 1), which further expands on the dynamics of abuse and the common tactics used in abusive relationships. Developed in 1984 by the staff at the Domestic Abuse Intervention Project in Duluth, Minnesota, the Power and Control Wheel is visually organized to mirror the dynamics of an abusive relationship. Power and control are at the center of the wheel, as this is the ultimate goal of the perpetrator. Each of the spokes represents typical behaviors utilized to maintain power and control, and the rim which holds the entire wheel in place is physical and sexual violence (Domestic Abuse Intervention Programs, 2019).

The Power and Control Wheel thus demonstrates the many possible ways in which abusers many never need to resort to physical violence in order to maintain power and control over their partner. Tactics range from emotional abuse to economic abuse, and all are enforced by an ever-present threat of physical and sexual violence. Any of the common tactics included on the wheel could make finding and maintaining housing more difficult for a survivor, whether directly or indirectly. Tactics can have a direct impact, for example using economic abuse to limit a survivor's ability to afford housing. Indirect impacts might stem from isolating a survivor from her family so that she doesn't feel comfortable seeking shelter with them or using emotional abuse to lower a survivor's self-esteem to the point where she doesn't believe she is worthy or capable of maintaining her own housing. It is this ability for abuse to be both directly and indirectly impactful on a survivor that can be especially difficult to understand and communicate in the "traditional" housing world; though the abuse may not directly keep a survivor from leaving, it creates an environment in which leaving feels impossible.

Impacts of Abuse

The consequences of domestic violence impact multiple aspects of a survivor's life. Just as there are countless ways to perpetrate abuse, there are also a multitude of ways in which abuse can impact a victim in the short and long term. Outside of the very real risk of death and direct physical harm, domestic violence is associated with numerous negative physical and mental health outcomes. Overall, survivors have been found to have worse health outcomes as related to injuries and illness when compared to those who have never experienced abuse (Afifi et al., 2009; Rivara et al., 2007). Additionally, a number of studies have found that women who have experienced Intimate Partner Violence (IPV) are more likely to experience negative mental health outcomes (Beck et al., 2014; J.E. et al., 2000; Lipsky, Caetano, Field, & Larkin, 2005; Zlotnick, Johnson, & Kohn, 2006). Common psychological impacts of IPV include posttraumatic stress disorder (PTSD), depression, and traumatic brain injury (Breiding, Chen, & Black, 2014; Campbell, 2002; Iverson, Dardis, Grillo, Galovski, & Pogoda, 2019; Kramer, Lorenzon, & Mueller, 2004; Truman, Morgan, & Statisticians, 2003; Valera & Kucyi, n.d.), all of which can make handling even the most mundane life activities debilitatingly stressful. These psychological impacts do not just affect a survivor during the

period of abuse, but continue to influence the ways in which they navigate the world after the relationship and create significant challenges towards establishing stability.

In addition to negative physical and mental health outcomes, survivors often face societal barriers when seeking to reestablish themselves after abuse. The nature of controlling relationships often restricts a survivor's ability to access opportunities during the relationship such as education, employment, or support networks (Botein & Hetlilng, 2016). These restrictions, coupled with the inherently terrorizing and destabilizing nature of abuse, create a context in which both finding and maintaining stable employment after leaving an abusive relationship may be particularly difficult. Additionally, economic abuse may have stripped the survivor of any previous financial advantages such as savings or a high credit score. Survivors have been found to experience job loss at a higher rate than those who have not experienced abuse, as well as higher job instability (A. E. Adams, Tolman, Bybee, Sullivan, & Kennedy, n.d.; Riger, Staggs, & Schewe, 2004; Showalter & McCloskey, 2020), and higher dropout rates from school (Hess & Rosario, 2018). Additionally, women who are already in economically unstable situations, such as on welfare, have been shown to experience higher rates of IPV (A. E. Adams, Tolman, Bybee, Sullivan, & Kennedy, 2012). This reinforcing dynamic between financial instability and abuse makes the ability to find affordable housing a preventative strategy for low-income women more likely to experience abuse, as well as a stabilizing factor for those who have already experienced abuse.

Housing Instability

Given the physical and mental impacts of domestic violence, it may be unsurprising that women who experience IPV have also been linked to higher rates of housing instability (Baker, Billhardt, Warren, Rollins, & Glass, 2010; Gilroy, McFarlane, Maddoux, & Sullivan, 2016; Pavao, Alvarez, Baumrind, Induni, & Kimerling, 2007). Women fleeing abuse have limited emergency housing options; most often they stay with friends or family, at a domestic violence shelter or homeless shelter, at a motel or hotel, or they experience homelessness. Over the long-term IPV has been linked to experiences associated with housing instability, such as increased likelihood of difficulty paying rent, mortgage or utility bills; frequent moves; over-crowded living conditions; doubling up with family or friends (Pavao et al., 2007; Rollins et al., 2012). In one study, women who recently experienced IPV were almost four times more likely to report housing instability than those who did not (Pavao et al., 2007). Not only is domestic violence linked to increased rates of housing instability, but recent literature supports the connection between IPV and homelessness (E. N. Adams et al., 2018; Baker Sarah L Cook Fran H Norris, 1997; Bassuk et al., 1997; Kastner, 2015). Strikingly, a 2003 study found that women in California who experienced IPV in the last year were almost four times as likely to report housing instability, compared to those women who did not experience IPV (Pavao et al., 2007). Additionally, current literature indicates that domestic violence is one of, if not the leading cause of homelessness among women and children. Not only do women leaving abuse experience homelessness as a direct result of leaving, they also are more likely

to experience homelessness within the first year after separation (Baker, Cook, & Norris, 2003).

Housing services are unsurprisingly one of the most requested services at domestic violence crisis centers and often go unmet. The 2019 Domestic Violence Count Census, conducted by the National Network to End Domestic Violence (NNEDV), reported more than eleven thousand unmet service requests from survivors with almost eight thousand, or about 70% of those, for “Housing and Emergency Shelter”. While shelters are an essential emergency resource for survivors seeking safety, they are often temporary in nature and don’t inherently help survivors find long-term housing. While the history of the domestic violence movement is intimately tied to the provision of housing services, the evolution of the movement and more traditional housing services has left a gap in the housing system that many survivors fall through. If the domestic violence system and the general public wish to reduce or eliminate experiences of domestic violence, it is imperative that issues related to survivor-specific housing affordability, safety, and availability are addressed in both the domestic violence system and, more broadly, in the “mainstream” housing system.

Section II: Domestic Violence Housing Systems

History of Housing in the DV Movement

Housing has been a part of the domestic violence movement since its beginning. The domestic violence shelter system and movement began in the 1970s and emerged within the context of the civil rights, antiwar, and feminist movements (Lehrner & Allen, 2009). Then called the “Battered Women’s Movement,” it had two main goals; to create social change, and to provide services to survivors (Lehrner & Allen, 2009). Within this two-goal framework, housing became a primary focus of many organizations that were trying to help women leave abusive relationships. This resulted in an initial focus on emergency housing, which was first provided in informal settings such as within movement members own homes. While sheltering in private homes is no longer widely practiced, the “battered women’s” shelter has been closely linked with the larger movement in the public imagination. Notably, the often Marxist-feminist leaders of the nascent domestic violence movement intentionally tried not to take on the provision of long-term housing, viewing it as a responsibility of the government and not service organizations (Botein & Hetlilng, 2016).

The first documented shelter for “battered women” in the United States was opened in 1974 in St. Paul, Minnesota by the Women’s Advocates (*History of Battered Women’s Movement*, 1999). Many other domestic violence organizations followed and by the end of the decade 250 shelters for abused women were operating across the United States (“History of the ‘Battered Women’s Movement,’” n.d.) By 1986, women’s shelters housed over 310,000 women and children (*History of Battered Women’s Movement*, 1999). Despite the quick

uptick in the number of shelters, the early domestic violence movement was highly fragmented and somewhat haphazard, with most organizations run predominately by volunteers and funded through limited private donations (Botein & Hetlilng, 2016). The movement lacked a larger state or federal organizing structure, which meant housing programs varied greatly depending on their values, community context, and available resources (Botein & Hetlilng, 2016). The movement was deeply influenced by its grassroots origins and feminist beliefs; shelters were conceptualized as communal spaces meant to build community and raise collective consciousness. While many shelters continue this legacy today, the domestic violence movement's grassroots beginnings often put them at odds with larger federal funding requirements and regulations.

At the start of the 1980s, the domestic violence movement and shelter system began to expand, formalize and professionalize. Shelters expanded services, formalized training and education requirements for staff, and began to shift towards a more traditional social service model. Several different factors facilitated this shift away from the grassroots work of the 1970s. First, federal funding slowly became available for the construction of shelters, and later for their operation, thus imposing a number of regulations and requirements on the often-informal shelters that hoped to receive funding. These organizations suddenly had to "distinguish between clients and staff, establish requirements for staff experience and education, and institute clear lines of authority" (Botein & Hetlilng, 2016), all new practices for grassroots organizations that were often staffed by survivors and featured non-hierarchical organizing structures. Second, as funding expanded, domestic violence organizations shifted some of their focus from local needs to state and national advocacy. Organizations such as the National Coalition Against Domestic Violence (NCADV) and the National Network to End Domestic Violence (NNEDV) created national structures advocating for the needs of survivors, while state coalitions acted on a more local level. These national advocacy efforts resulted in the opening of several significant federal funding streams which created new opportunities but also caused tension within the movement. Some activists felt constrained by partnering with the very systems which they sought to dismantle, and there are cases of organizations refusing funding when regulations were too restrictive (Botein & Hetlilng, 2016).

With new federal funding available, domestic violence programs began broadening their programs. As is still true today, many women entering emergency shelters were unable to find affordable housing and often cycled back to their abuser, to another shelter, or into homelessness. Borrowing from international examples and the mental health system, domestic violence housing turned towards the transitional housing model (Botein & Hetlilng, 2016). Transitional housing attaches supportive services to housing with the goal of stabilizing the survivors so that they may eventually find and maintain traditional market housing (Committee et al., 2005). Transitional housing is usually time limited, with residents able to stay in the program for one to two years. While this first foray into longer-term

survivor-specific housing began to pivot the movement towards long-term housing programming, it was not without its challenges and for many survivors even two years was not enough time to secure stable housing. As the domestic violence system continues to expand past transitional housing, the modern movement has already begun integrating domestic violence into traditional housing systems and traditional housing systems into domestic violence housing.

Current Domestic Violence Housing Systems

As domestic violence programs continued to evolve through the nineties and into the early aughts, many organizations were forced to consider taking a larger role in survivor-specific long-term housing solutions, as the housing affordability crisis continued to worsen. As described in Home Safe Home, in the early 2000s,

“the macro-economic environment put great stress on this (emergency shelter) service model, at both entry and exist points. Shelters were filled to capacity and some urban areas had waiting lists for beds. IPV survivors who were in emergency shelters confronted a shortage of affordable housing, which was a problem for all low-income households. The challenges of availability, accessibility and appropriateness of public housing and related social services exacerbated the need for appropriate and affordable permanent housing.”

Two major pieces of legislation also helped push domestic violence programs to more seriously consider long-term programming. In 2005, a reauthorization of the Violence Against Women Act (originally enacted in 1994), set aside ten million dollars for efforts to create permanent housing options for survivors (Sacco, 2019). While this was revoked in 2013, the money still created an incentive for organizations working on long-term housing efforts. The 2005 VAWA reauthorization’s inclusion of a number of new protections for survivors seeking to live in or currently living in federally subsidized housing had more of an impact. The new protections included regulations against being denied admission to or evicted from housing on the basis of being a survivor, as well as a requirement for emergency transfers to a new unit if the safety of a survivor is compromised in their current unit (Sacco, 2019). The second major legislative change came with the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act) which incentivized a shift in focus from emergency housing to permanent housing in the homelessness service world. This shift included additional funds for long-term housing programs and added those fleeing abuse to the official definition of homelessness (“Public Policies,” 2020). Both legislative updates meant that there was more funding and support for long-term housing programs, and that domestic violence programs were eligible to receive money previously only available for organizations serving individuals who meet the federal definition of homelessness.

Prior to the inclusion of people fleeing or attempting to flee domestic violence¹ in the federal definition of homelessness, HUD-administered homelessness funds were not as accessible to domestic violence organizations. Not only did the HEARTH Act open up new funding streams to domestic violence programs, but it also pushed the entire homelessness system towards the Housing First Model and a focus on permanent housing programs. The Housing First philosophy asserts that people experiencing homelessness should be placed into permanent housing as quickly as possible, instead of requiring they complete any number of programs, including drug or mental health treatment, to prove their “housing readiness” (*Fact Sheet: Housing First*, 2016). Following the Housing First model, an individual experiencing homelessness is placed into permanent housing and uses that housing as the foundation off which other services can be provided and needs addressed. This shift, formalized in the HEARTH Act, pivoted the entire homelessness and low-income housing field towards permanent housing solutions and programs, and away from emergency shelters. Indeed, the number of shelter beds has been declining since the passage of the HEARTH Act, while permanent housing beds have increased over the same time period (Leopold, 2019).

Most domestic violence organizations across the country are well acquainted with the administration and implementation of federal funds and programs, predominately through the Department of Justice’s Victims of Crime Act grants and Health and Human Services’ Family Violence and Prevention Services Act funds, however many are often less familiar with the HUD funding landscape. It is perhaps unsurprising then, that a number of key partnerships at the federal level have begun in recent years to dedicate time and expertise towards bringing domestic violence organizations up to speed with HUD practices and regulations. The Domestic Violence and Housing Technical Assistance Consortium, funded through a partnership with the Department of Health and Human Services, the Department of Justice, and the Department of Housing and Urban Development, “brings together national, state, and local organizations with deep expertise on housing and domestic violence in order to collaboratively build and strengthen technical assistance to both housing/homelessness providers and domestic violence service providers”(Ostrander, n.d.)

The Consortium is behind the creation of the National Alliance on Safe Housing, which is working to bring together the homelessness and domestic violence systems to “ensure that survivors of domestic and sexual violence have access to a full range of housing options.” (“The National Alliance for Safe Housing (NASH),” n.d.) In addition to the critical technical assistance and advocacy work done by these organizations, domestic violence providers across the country are experimenting with new housing programs and designs including building subsidized housing specifically for survivors using the Low-Income Housing Tax Credit, developing Rapid Rehousing assistance funds, and new permanent

¹ Current HEARTH Act Homeless Category 4: “Individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member.”

supportive housing programs (Correia, n.d.; Sullivan & Olsen, 2016). As domestic violence organizations continue the long tradition of expanding their housing programs past emergency shelter it is imperative that the domestic violence world fully understands and leverages the HUD system for the benefit of survivors.

Section III: HUD's Consolidated Plan and Opportunities for Impact

While working with HUD is not a new phenomenon for many domestic violence organizations, changes in the HEARTH Act have opened up opportunities within a variety of homelessness programs through which domestic violence organizations can access additional and previously unavailable resources. Innovative housing solutions have already begun developing at this intersection, however there are still many untapped opportunities for domestic violence organizations to access much needed funds outside of HUD's homelessness programs. The Consolidated Plan, a HUD-regulated planning process used to inform the dispersal of a number of large HUD block grants, is one such opportunity. It is unclear from current research and practice when, how, and to what effect, domestic violence organizations are involved in the ConPlan process. Due to its highly regulated nature and requirements for community engagement, the ConPlan has the potential to provide an access point into the HUD formula-grant dispersal process previously untapped by the domestic violence housing system.

HUD Funding Practices

HUD's Office of Community Planning and Development administers many of the homelessness programs typically associated with HUD. Homelessness programs administered by this office fall into two categories: formula and competitive. Funds distributed to a Continuum of Care (CoC) fall under the competitive category, as they are awarded based on a competitive scoring process. In contrast, formula grants are provided based on a set formula and dispersed within states and cities based on local priorities and needs. Local priorities and needs are determined through the completion of the Consolidated Plan, which is required and reviewed by HUD. While domestic violence organizations have more recently become involved in local Continuums of Care, it is unclear to what extent they have been involved in the Consolidated Plan and the dispersal of its associated formula funds. As such, the ConPlan could provide a new avenue for domestic violence organizations to impact the use of federal funds in their communities.

The Consolidated Plan

The Consolidated Plan (ConPlan) is a long-range planning document required by HUD for jurisdictions that receive certain federal housing and community development funds². Jurisdictions that complete Consolidated Plans may include state and local governments, however the specific definition of Consolidated Plan jurisdictions differs for each grant included under the Consolidated Planning process (Technical Assistance Collaborative, 1999). The Consolidated Plan's statutory basis is the Comprehensive Housing Affordability Strategy (CHAS), and the modern ConPlan was created by regulation updates passed in 1994 (Gramlich, 2001a). The ConPlan represents an effort to give local jurisdictions increased control of the disbursement of federal housing and community development funds, but is also a highly regulated process which includes a number of required elements and requires final approval by HUD. Because the ConPlan is incredibly regimented, with rules regarding analyzing community trends, notifying the public of plan development, and collecting community feedback, it provides an opportunity for jurisdiction residents to voice their opinions about how a significant portion of federal funding gets allocated on the local level. As domestic violence organizations look to increase the reach of their housing advocacy and potentially expand their housing programs, the ConPlan is a potential high impact process for increasing community influence.

Opportunities for Domestic Violence Housing

The ConPlan presents a unique advocacy opportunity, as it is a highly regulated process which requires public engagement and consultation. Theoretically, if advocates understand the ConPlan process, they can find places to influence decision makers and outcomes. Additionally, the ConPlan is a long-range planning document that sets priorities for a five-year period. This means that if advocates can successfully influence the ConPlan, they have the opportunity to influence local housing and community development funding decisions for the next half decade. While some domestic violence organizations may already be involved in their ConPlan, there has been no coordinated effort to educate advocates on this particular process and therefore is likely an underutilized advocacy tool. Several attributes of the ConPlan could be of particular use for domestic violence advocates looking to engage in this funding allocation process³.

Data and Needs Assessment

The first key element of the ConPlan is the completion of a Housing and Community Development Needs assessment. This portion of the plan is used to estimate housing needs

² Grants which require completion of the ConPlan process include: The Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships (HOME) Program, the Emergency Solutions Grants (ESG) Program, the Housing Opportunities for Persons With AIDS (HOPWA) Program, and the national Housing Trust Fund (HTF) Program.

³ For a complete explanation of the key elements and requirements of the ConPlan, please see Appendix A.

for the next five years and must reflect a public participation process and the ideas of social service agencies (*Advocates' Guide 2020*, 2020). This section involves data analysis elements common among other housing assessments including estimations of housing needs by income categories, tenure type, and family type. By regulation, the entity completing the ConPlan must consult with the local Continuum of Care. As many domestic violence organizations are already active participants in their CoCs, the regulation of CoC consultation should provide a clear opportunity for providing feedback on the needs of local domestic violence survivors. Additionally, the ConPlan regulations require that jurisdictions report on the housing needs of domestic violence survivors. Domestic violence organizations that have not previously been involved in the ConPlan due to unfamiliarity with the process thus have a clear opportunity to engage in the process through the provision of accurate and compelling data on the housing needs of survivors.

Public Participation

Public participation is built into the ConPlan process through the use of public hearings. While engagement with local service systems is integral to the development of the Housing and Community Development Needs section, public hearings provide another opportunity for domestic violence providers to advocate on behalf of survivors. Public hearings must be publicly advertised and copies of drafted documents made available to the public. Comments provided during the public hearing must be addressed in the final plan draft with an explanation of why any suggestions were not used. Additionally, each jurisdiction is required to create a "citizen participation plan", which must be available for public review. Although highly regulated, these public participation requirements do not always yield robust engagement, however they do create a predictable process for advocates interested in engaging with the ConPlan. Theoretically, by learning about one's ConPlan jurisdiction, determining the schedule for ConPlan completion, and paying attention to public notices, an advocate should be able to easily engage with this process by providing public comments or attending public hearings on the ConPlan draft. While some domestic violence organizations may view HUD-related processes as overly time intensive; the ConPlan is a potential engagement mechanism which requires low time commitment.

Enforcement

The ConPlan is a regulated planning process, however enforcement mechanisms are weak and rely on two main mechanisms: HUD review and citizen-initiated complaints (Rawson, 1998). HUD may find that a ConPlan does not meet stated requirements and reject the plan until those requirements have been updated. While this oversight is helpful, HUD is under no obligation to reject a plan simply because the quality of that plan is lacking; as long as the plan meets the minimum criteria it is likely to be approved. The second enforcement mechanism is citizen-initiated, meaning that community members could alert HUD to a deficiency in the ConPlan or process (Rawson, 1998). Regulations dictate how any issues raised will be dealt with and investigated, however lodging a complaint requires at least a

baseline understanding of the ConPlan requirements. As domestic violence providers become more familiar with the ConPlan, this may be an effective tool to ensure high quality and responsive ConPlans.

Privatization

Today, many jurisdictions hire consultants to complete at least some portion of their ConPlan. While consultants help to augment local planning capacity, they also enter into communities with little local knowledge. Some consulting firms are regionally focused, but others complete ConPlans across the country. The use of a consultant does have several advantages for a domestic violence organization wishing to impact the planning process. Consultants often utilize standard frameworks for completing a ConPlan; for example, they may have a standard list of types of organizations to contact during the needs assessment phase of the process. This list often includes stakeholders across the housing and social service sector including the local domestic violence agency. Domestic violence programs willing to respond to the consultants call for feedback will have a direct line to the authors of their local ConPlan. Domestic violence providers not aware of the ConPlan, or unfamiliar with the process, may overlook these requests thereby decreasing the chance that the housing needs of survivors are accurately portrayed throughout the ConPlan.

As discussed above, the ConPlan represents a largely untapped advocacy resource for domestic violence organizations. While some providers and state coalitions have participated in the process, there is little research or insight into how many organizations are participating, why they've chosen to get involved, and what outcomes they've experienced due to their involvement. The following cases study investigates the ways in which the ConPlan contributes to the overall housing advocacy strategy of The Kentucky Coalition Against Domestic Violence. The Kentucky Coalition has consistently provided comments on the ConPlan, but the case delves deeper into how important the ConPlan is as an individual advocacy tool.

ConPlan Case Study: Kentucky Coalition Against Domestic Violence

Housing Program Evolution

The Kentucky Coalition Against Domestic Violence (KCADV) was founded in 1981 by the staff of separate direct-service DV programs ("Our History," n.d.). Then called the Kentucky Domestic Violence Association, this statewide coalition of member programs began working on coordinating Kentucky's domestic violence services across the state. With only six shelter programs in the entire state in 1980, the coalition helped to open programs with shelters in each of Kentucky's fifteen Area Development Districts by 1987. KCADV's original purpose was "to provide mutual support, information, resource sharing and technical assistance; to

coordinate services; and to collectively advocate for battered women and their children on statewide issues” (“Our History,” n.d.). Since its founding, KCADV has advocated on behalf of anyone who experiences domestic violence, working to change state laws, pass legislation and increase resources for victim services.

While shelters have always been a part of the KCADV story, their philosophy on housing has evolved with the times. In the 1990s, HUD introduced the Continuum of Care (CoC) program, an organizational structure and process which hoped to promote coordination within communities and between programs seeking McKinney-Vento homeless assistance funds (Blasco, n.d.). Prior to the advent of the CoC, individual organizations applied directly to homeless assistance programs, resulting in a lack of coordination within communities. As the CoC was introduced across Kentucky, KCADV and its member agencies made sure they had a seat at the table and often took the lead in shaping the new CoC process. This early integration of KCADV into the state’s community planning and funding discussions fostered a positive working relationship between the domestic violence system and more traditional housing (*Mary O’Doherty, Jan 5, 2021*), most importantly between KCADV and the Kentucky Housing Corporation (Kentucky Housing). Kentucky Housing administers an Emergency Solutions Grant Program, which funds KCADV shelter operations and administers the statewide CoC funding process. By engaging in the CoC rollout, KCADV not only ensured survivors needs were taken into consideration, but also began a strong partnership with Kentucky Housing who administers both the state’s competitive and formula HUD funding. KCADV’s CoC work allowed them have what Kenzie Strubank, the current Manager of Homeless Programs at Kentucky Housing, calls a “very natural relationship” and “a very organic partnership” (*Kenzie Strubank, Dec 7, 2020*).

By the early 2000s, the Coalition hired Mary O’Doherty as their first Economic Justice Services Coordinator. Prior to Mary’s hiring in the early 2000s, Mary did not believe that anyone from KCADV was participating in the ConPlan process on a regular basis. Indeed, according to Andrea Miller, NCADV’s current Director of Economic Empowerment Programs, before Mary’s hiring there was no one at KCADV with any housing experience (*Andrea Miller, Jan 8, 2021*). This was part of the reason the position was created: to dedicate time and Coalition resources towards learning about and participating in relevant housing processes across the state, as well as to focus on childcare and employment issues. As Mary began her work, it became increasingly clear that expanding housing opportunities for survivors in Kentucky would require her full attention, noting that “the housing arena was just so rich and there was so much to be done” (*Mary O’Doherty, Jan 5, 2021*). Mary’s job helping Coalition member programs connect survivors to housing resources was made easier by both the strong support of Coalition leadership and the decades-long partnership between KCADV and other housing agencies. Additionally, the organization of KCADV’s member programs, with one program and corresponding shelter located in each of Kentucky’s development districts, meant that Mary could also draw on strong regional housing leadership.

In 2007, KCADV received word that a number of Low-Income Housing Tax Credits had been set-aside specifically for the development of housing for domestic violence survivors. Despite a lack of experience with the tax credit program, KCADV and Mary began learning how to find available land, secure a developer, and finance the project. Notably, tax credit housing is a different form of housing program than HUD-funded grants distributed through the ConPlan or through the Continuum of Care processes. While unrelated to the ConPlan, the tax credit housing process required KCADV to build capacity around housing in new ways and allowed the Coalition to create and strengthen relationships within the broader affordable housing space. For example, as KCADV worked on making the project financially feasible, they needed a way subsidize rents. While the tax credit units would be affordable to families making 60% of the area median income, Mary and others at KCADV knew that their clients would likely still not be able to afford the “affordable” rent. The Coalition drew on and built new relationships with the State Housing Finance agency, member programs, and local housing agencies to secure rental subsidies for all of their 72 units. The experience of developing 72 tax credit units was key in developing organizational capacity focused on housing and built KCADV’s reputation across the state as an organization capable of taking on large housing projects.

Throughout the early 2010s, KCADV continued to bolster its housing programs and extend its reach and reputation. In 2009, KCADV received nearly eight hundred thousand dollars through Kentucky’s Housing and Emergency Assistance Reaching the Homeless program and utilized these funds through 2012; two member organizations also were direct grantees of the Kentucky HEARTH program (Stauffer & Miller, n.d.). The Kentucky HEARTH grant was the first time KCADV and member organizations actually administered a housing program from Kentucky Housing. This first foray into housing program administration not only proved that KCADV was a willing and apt partner for Kentucky Housing, but allowed KCADV to work out the kinks in their own systems. KCADV learned that due to the capacity challenges of many of their smaller member agencies, it was advantageous for the Coalition to directly administer the housing programs in partnership with member agencies, rather than relying on member agencies as subgrantees (*Mary O’Doherty, Jan 5, 2021*). Building on this momentum, KCADV and other member organizations were excited and interested in what other resources were available through other HUD funding streams. Based on their success with the Kentucky homelessness programs, KCADV was asked by Kentucky Housing in 2012 to assume management of a Tenant-Based Rental Assistance grant. This request by Kentucky Housing indicates a clear trust between both organizations; the Coalition did not seek out these funds, but were invited to take on the grant as a trusted and proven housing partner. In 2015, Kentucky Housing again sought out KCADV to apply for a new statewide Continuum of Care-funded rapid rehousing project.

After the success of the tax credit housing, KCADV drew upon existing relationships to access a variety of funds through Kentucky Housing and used each new opportunity to continue to

prove their administrative capacity and strengthen their partnerships. While these programs are notable, none of them are funded through the ConPlan process; however, through their administration each new housing program solidified KCADV's bond with Kentucky Housing, who is charged with completion of the state's ConPlan. Kenzie notes that, through these rapid rehousing funds, Kentucky Housing's "overall relationship between the Balance of State Continuum of Care and KCADV has just grown stronger and stronger" (*Kenzie Strubank, Dec 7, 2020*). Following an amazing career building relationship and bolstering KCADV's housing program, Mary O'Doherty left her position in Kentucky to become the Executive Director of the Ohio Coalition Against Domestic Violence in 2019. Today, Andrea Miller has taken over the position first held by Mary and continues Mary's work with housing agencies across the state of Kentucky.

Consolidated Plan Experience

KCADV's decades of successful housing program administration and close relationship with Kentucky Housing naturally led to involvement in the state's ConPlan process⁴. Mary O'Doherty came to her position with little direct knowledge of Kentucky's housing systems, but her position provided dedicated time for her to learn more about Kentucky's housing systems and to delve deeper into her understanding of HUD processes and procedures. Initially, Mary spent her time making sure she was subscribed to the housing listservs so she would receive important updates in a timely manner. She attended meetings and made herself known to key stakeholders at Kentucky Housing and other housing organizations. She reviewed resources provided by Kentucky Housing on their websites, and when ConPlan meetings or hearings came up, she attended. She used these first ConPlan meetings as part of her housing education: "I was schooling myself in all these different funding streams, and I could see that that would be a way to just learn more about how the funding streams worked, so that's why I started going (to the ConPlan hearings) because I thought it'll help me figure this out, and it did." Today, Mary's successor benefits greatly from the groundwork Mary laid during her initial education in Kentucky's housing systems.

As Mary's knowledge of Kentucky's housing systems and funding streams continued to grow, she began utilizing the annual ConPlan meetings not just as educational opportunities, but as opportunities for impact. The ConPlan meetings provided KCADV excellent opportunities to remain relevant and front-of-mind with decision makers at Kentucky Housing. Mary notes that, "it was a really great way to get their attention, to remind them that we existed, to remind them of the needs, and the large number of people we serve." But flying the KCADV flag included more than showing up to ConPlan public hearings; the Coalition also took advantage of the meetings to make a case for the continued funding of their housing programs. For example, when KCADV and other housing groups feared that a rental

⁴ As the state DV coalition, KCADV does not cover Lexington and Louisville. Similarly, KHC does not providing funding to either of the two cities as both cities are large enough that they each constitute their own entitlement jurisdiction and therefore submit their own ConPlan's to HUD.

assistance program might lose funding, Mary leveraged ConPlan public hearings and comment periods to publicly thank Kentucky Housing for their support of the rental assistance program and remind them of its success. Her prepared remarks often included success stories of survivors who had achieved housing stability due to programs funded by HUD and administered by Kentucky Housing. Not only were these meetings useful in demonstrating the success of their programs, but Mary also found ConPlan meeting attendance to be a relatively easy way to get facetime with Kentucky Housing leadership: “You went there for an hour with the prepared remarks, and you got to talk to the leadership of the agency. And they really appreciated that you showed up because hardly anybody would ever show up to these things... you got a lot of goodwill just for showing up.”

In addition to providing public comments and feedback on the ConPlan, KCADV's provided necessary data used to create the ConPlan. While Mary and Andrea reported that they did not participate in the actual drafting of the ConPlan, KCADV does play a significant role in providing data to the ConPlan preparers as part of the community's needs analysis. For example, the most recent Kentucky ConPlan was created by consulting firm Mullin & Lonergan Associates Inc., on behalf of Kentucky Housing. This outside consulting firm had some experience in Kentucky housing systems, having just completed a major housing study in Louisville, but still relied heavily on local providers during the data gathering phase of their process. Marjorie Willow, the Project Manager for the Kentucky ConPlan, highlighted the difficulty she and her team often have in locating accurate domestic violence data without direct involvement from the domestic violence coalition or agency (*Marjorie Willow, Jan 8, 2021*). She noted that much of the data related to domestic violence and domestic violence housing is not easily accessible for consultants and agencies working on the ConPlan. KCADV collects its own data from member organizations as part of the annual Domestic Violence Count Census, but also collects and manages a variety of data and indicators related to the housing programs they administer. Again, KCADV benefits from their close relationship with Kentucky Housing. In recent months, these two organizations have worked together closely to make the homeless and domestic violence data collection systems more integrated (*Curtis Stauffer, Dec 7, 2020*). This helps KCADV provide better information during the ConPlan process, allowing KCADV to quantitatively make a case for the continued funding of their programs and demonstrate their continued need, but also contributes to an ongoing exchange of programmatic data that strengthens both systems. KCADV is also in the process of conducting their own needs assessment of domestic violence services across the state. This needs assessment will be another tool that can be provided to the ConPlan preparers to justify the need for continued or increased funding for existing and new DV housing programs in Kentucky.

Showing up to ConPlan meetings didn't only just garner goodwill with the individuals in charge of distributing funds, but also provided an opportunity for facetime unrelated to the specific content of the ConPlan itself. Mary describes a time when she was able to elevate a

concern with a program process that was having negative impacts on survivors seeking long-term housing:

'There was one time I did go to talk about a problem that we were having... because I brought it up at the Consolidated Plan meeting and because those meetings were not well attended, one of the people in charge at KHC heard me and he understood. He came up to me afterwards and said, 'I understand this bureaucratic thing that you're talking about; I understand what you're saying and you're right, we need to fix that.' And then they did... We had to show up at this public hearing and talk about it and then they fixed the problem.' (Mary O'Doherty, Jan 5, 2021)

Providing accurate key data points, writing success stories and other talking points and participating at a few relatively short public meetings held once a year provided Mary and KCADV "a lot of bang for [her] buck" when it came to the ConPlan. When it came time for Mary to move into her new position as the Executive Director of the Ohio Coalition Against Domestic Violence, the knowledge she accumulated over more than a decade of housing work was passed down to her successor. Andrea described her transition into KCADV's housing policy work as a somewhat informal handoff between coworkers (Andrea Miller, Jan 8, 2021), where Mary laid out the meetings Andrea would now be responsible for attending and helped acclimate her to the system. While seemingly a trivial question of onboarding, the handing down of institutional knowledge has been key to the ongoing success of KCADV's relationships within Kentucky's housing world and connection to the ConPlan. Andrea's approach to the ConPlan mirrors that of Mary, relying on public comment periods to maintain funder connections, presenting success stories to show how funds are utilized, and providing accurate data when needed, stating: "it's about building a relationship and building your presence and your voice" (Andrea Miller, Jan 8, 2021). Andrea also noted that job transitions can actually provide an opportunity to service providers and coalitions looking to strengthen their relationships with housing agencies by providing a chance for an introduction and informational interview. She noted that even if an agency has missed the ConPlan preparation window, there is still an opportunity to build relationships through a genuine interest in learning about housing systems and programs (Andrea Miller, Jan 8, 2021).

While Mary and Andrea both recognize the positive benefits of ConPlan participation, it is clear from the larger KCADV story that the ConPlan is simply one piece of a larger housing advocacy strategy that has resulted in positive outcomes for KCADV. While the ConPlan created the initial avenue for Mary, and later Andrea, to learn about a number of HUD funding practices, it was not the only option for her housing education nor the only way she became involved with Kentucky Housing. The housing work done by Mary, Andrea and others at KCADV built on decades of previous partnership across Kentucky housing and homelessness systems. KCADV, through the administration of a variety of housing programs, proved their willingness not just to collaborate with more "mainstream" housing systems, but

to learn the intricacies of those system to help them work better together. DV housing work is sometimes siloed from other housing systems and funding streams, especially if a coalition's partnership with their housing financing agency isn't particularly strong. The Kentucky case shows the ways in which the ConPlan can be leveraged as an effective tool to bridge those gaps and increase collaboration between the two systems.

Key Takeaways for Practice

While the domestic violence movement has historically focused their resources on creating and maintaining emergency housing for survivors, a variety of social and political factors have pushed domestic violence providers to consider developing more long-term survivor-specific housing programs. While the Kentucky Coalition Against Domestic Violence has a long history of interacting with the ConPlan, the success of its program relies more heavily on deep partnerships with housing organizations and its long-standing reputation as both a developer and provider of housing services. **ConPlan engagement, while useful for expanding the reach of DV housing advocacy, is not a necessary condition for successful housing work. Instead, the ConPlan should be viewed as a reinforcing framework that can build on and strengthen other foundational DV housing advocacy actions.** Drawing on the analysis of the Kentucky case, the following discussion details a variety of implications for domestic violence housing practice.

1. Housing Advocacy Requires a Dedicated Position: Kentucky was able to expand their housing advocacy efforts after they hired a staff person with time dedicated to learning and understanding the various state housing systems. If state coalitions or member organizations hope to expand their understanding of and collaboration with housing programs and funding streams (either local, state, or federal), there must be a position specifically tasked with attending relevant meetings and trainings, providing public comments on relevant legislation or plans, and building relationships with partner housing agencies. This is especially relevant for service organizations who focus on the immediate needs of their clients and who have a long-term interest in building relationships and knowledge of housing funding streams and planning processes.

Potential Next Steps:

- Identify staff person to attend necessary ConPlan meetings and trainings, and respond during comment periods.
- Ensure staff person has capacity set aside during ConPlan timeframe to respond and attend meetings (ConPlans occur on a different schedule in each entitlement jurisdiction).

2. FOCUS ON BUILDING RELATIONSHIPS: The Kentucky Coalition relied heavily on strong relationships with other housing organizations to advance their housing agendas. For the

Kentucky Coalition, the ConPlan serves as a key activity in maintaining positive relationships with Kentucky Housing Corporation and demonstrating their appreciation for specific funding streams. Every housing training, planning meeting, and strategy session should be viewed as an opportunity to strengthen and build relationships. The ConPlan presents an excellent opportunity for this type of networking, especially for those seeking to better understand programs and funding streams addressed by the ConPlan process. Mary at KCADV noted that the ConPlan provides “good bang for your buck,” saying that for a one hour meeting she was able to gain valuable face time with key housing leaders.

Potential Next Steps:

- Attend trainings, meetings, and work sessions with the agency responsible for completion of the ConPlan.
- Provide training or educational materials to the agency responsible for completion of the ConPlan, especially if they are unfamiliar with your agency or the domestic violence service system.
- Continue engagement through existing channels such as the CoC or task forces.

3. Learn to Speak the Language: The domestic violence field has a history of working outside “mainstream” housing systems, and this legacy continues today. While many coalitions and organizations are breaking down silos and working collaboratively with “mainstream” housing organizations, others continue to struggle with entering the world of HUD-funded programs and regulations. Kentucky Housing Corporation praised the Kentucky Coalition’s willingness to learn the language of HUD. Conversely, there is an opportunity to teach the language of domestic violence programs to “mainstream” housing organizations; this willingness to work collaboratively and break down silos strengthens the work of both the domestic violence agency and the housing agency. Further, by understanding HUD’s values and incentives, domestic violence organizations can position themselves strategically in both CoC funding competitions and within the ConPlan process.

Potential Next Steps:

- Identify and attend HUD-sponsored trainings on ConPlan and other federal funding streams.
- Review your area’s current ConPlan and Annual Action Plan.
- Review training materials on HUDEXchange.com
- Subscribe to related listservs and newsletters which provide information on local and state housing updates.

4. BUILD TRUST BY DEMONSTRATING CAPACITY: The Kentucky Coalition found success in expanding their housing program by building trust with their main funding agency, the Kentucky Housing Corporation. By demonstrating their capacity to administer a variety of housing programs and work collaboratively, the Kentucky Coalition built up so much trust

with their funder that Kentucky Housing Corporation came to them multiple times to ask them to accept new funds. While Kentucky administers a number of large housing programs, smaller organizations can apply this same principle on a smaller scale, demonstrating capacity through consistent, transparent, and responsible program administration. This is especially important for programs that have never been funded by ConPlan-related funding streams. While similar in some ways to CoC-administered funds, ConPlan-related grants entail different programs, regulations, and reporting requirements. Organizations should consider building up their capacity under any new funding stream through partnership agreements or small manageable projects, as a means of learning the new system and demonstrating organizational capacity.

Potential Next Steps:

- Identify small and mid-sized grant opportunities through ConPlan grants - including opportunities to partner with larger organizations.
- Apply for identified opportunities when available, working with partners when possible to strengthen application.
- Conduct a self-audit of current programs and grants, identifying areas for administrative improvement.

5. Use Data and Storytelling to Communicate Needs: The Kentucky Coalition cited the ConPlan as an excellent opportunity for demonstrating survivor housing needs through the provision of accurate and compelling data and also through the use of storytelling during public comment periods. Data on domestic violence survivors is required in the ConPlan, but this data is often not available from any source other than a domestic violence coalition or direct-service organization. The domestic violence system should take this as their invitation to actively participate in the ConPlan process by providing necessary data, as well as any other metrics that demonstrate the level of their community's need. In Kentucky's case, Mary not only provided quantitative program data, but frequently told success stories during ConPlan public hearings, strengthening the request for continued funding by giving examples of the funding at work.

Potential Next Steps:

- Develop success stories to demonstrate the benefits provided by existing programs.
- Collect and maintain accurate data on existing programs and services.
- Provide data promptly and comprehensively when requested for planning efforts.
- Develop talking points for use during public meetings that demonstrate the continued need for funding and thank current funders for their support.

6. UNDERSTAND YOUR CONTEXT: Domestic violence organizations exist within unique political, social, and organizational contexts. The housing systems in every community across

the country are specific to that community, and strategies used in one place may lead to drastically different results in another. Domestic violence organizations, therefore, must take the time to understand the housing systems in which they are operating. For example, in Delaware the State Housing Authority completes the ConPlan and also serves as the State Housing Finance Agency. While the DE Housing Authority is a member of the CoC board, the CoC is run by a separate organization. In Kentucky, the ConPlan is completed by a consultant that is contracted by Kentucky Housing Corporation. Kentucky Housing Corporation leads the CoC and also administers HUD formula-based grants, but owns none of their own housing. In addition to these drastically different housing systems, each coalition plays a different role within their state: KCADV administers a rental assistance program and also develops and manages their own tax credit housing, while DCADV has no programs funded by HUD-grants and provides no direct-services to survivors. KCADV and DCADV do not need to fill the same role in order to successfully advocate for survivor housing resources, but each must use their current positioning to their advantage, drawing on their strengths to continue to build out their housing programs. Programs hoping to become more involved need not know every detail of their state's housing system, but understanding the basics can definitely help. Building knowledge around who funds what programs and who is responsible for specific planning practices will help organizations understand how to leverage existing relationships and strengths to move their agenda forward.

Potential Next Steps:

- Identify current major housing funders in your community.
- Review current ConPlan and Annual Action Plan for information on how funding has been allocated.
- Identify your community's current ConPlan timeline, add key dates to calendar.
- Review your organization's mission and vision, identifying how the ConPlan could help achieve your goals.

Limitations and Opportunities for Future Research

This study has a number of limitations. First, this study and its takeaways are based predominately on the analysis of one in-depth case study. While a qualitative understanding of this case provides insight into the ways that one organization interacts with the ConPlan, it does not provide generalizable findings in the traditional sense. By focusing on a single case, detailed analysis was possible despite the time constraints of a single year academic project; however, the inclusion of additional cases was initially intended during the design of the study. Due largely to the ongoing COVID-19 pandemic and the increased strain on both the housing and domestic violence systems, many organizations who were contacted for

inclusion were unable to participate in the project. Additionally, some individuals identified as stakeholders related to both the Kentucky and Delaware interviews were unable to participate in the interview process due to the increased demand on their time due to COVID-19. Future research, conducted when time constraints are not as limiting, might follow a similar structure to the research above but take a more comparative approach between multiple case studies.

Access challenges also limited the types of organizations included for study. State domestic violence coalitions serve in a different capacity than direct service organizations. This difference in structure between state coalitions and direct service organizations related to capacity, funding, and programming limits the applicability of the study's findings to direct service organizations. It is possible that direct service organizations, such as shelters or crisis centers, face different challenges and barriers to accessing the ConPlan than state coalitions. Notably, the very purpose of many state coalitions is to advocate on behalf of direct service organizations at the regional and state levels. State coalitions may thus be intrinsically better suited to incorporate the ConPlan into their ongoing advocacy efforts. Future research might consider looking more closely at the unique characteristics of direct service organizations and how they may impact the utility of participation in the ConPlan process.

Finally, by taking a qualitative case study approach, this study intended to initiate a discussion about the ConPlan and the ways in which domestic violence organizations might leverage it as a tool for survivor housing advocacy, not to provide a definitive answer on how best to engage with the ConPlan or discuss larger trends related to the ConPlan. Further research into larger trends surrounding the ConPlan might take a more quantitative approach, conducting a comprehensive review of ConPlans, analyzing how often domestic violence is mentioned in the report, or how often DV organizations provide feedback to the ConPlan agency.

Conclusion

Housing is integral to a domestic violence survivor's ability to leave an abusive relationship and reestablish physical, emotional, and financial security. Not only does a lack of affordable housing help to create the conditions in which an individual may be vulnerable to abuse, but it also creates an additional barrier to leaving an abusive relationship. While housing, especially emergency housing, has always been foundational to the domestic violence movement, domestic violence service providers have not always worked within more traditional homeless and affordable housing systems. As a variety of legislative and social changes has brought the domestic violence and homelessness systems together, there are still gaps surrounding affordable housing development, programming, and funding. While the ConPlan is not a silver bullet for domestic violence housing creation, it does represent a

seemingly untapped resource for housing advocacy. As exemplified in the case of the Kentucky Coalition Against Domestic Violence, the ConPlan did provide an effective avenue to strengthen relationships and engage housing leaders, though it was only one part of KCADV's larger housing approach. The recommendations provided above utilize this framework, suggesting that domestic violence organizations interested in engaging in the ConPlan process should view it as simply an additional advocacy tool at their disposal. Not engaging with the ConPlan will likely not cause irreparable harm to an organization's housing work, but ignoring it altogether leaves on the table opportunities for engagement and relationship building. As the domestic violence movement continues to expand its expertise and knowledge in HUD and other affordable housing programs, the ConPlan must be part of that expansion. Housing for domestic violence survivors is too important to leave any avenues for advocacy unexamined.

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Appendix A: Consolidated Plan Overview

HUD's Consolidated Plan: Overview

What is the Consolidated Plan?

The Consolidated Plan (ConPlan) is a long-range planning process and document required by HUD for jurisdictions that receive federal housing and community development funds from the following 5 HUD block grants:

1. Community Development Block Grant (CDBG)
2. HOME Investment Partnerships (HOME)
3. Emergency Solutions Grants (ESG)
4. Housing Opportunities for Persons with AIDS (HOPWA)
5. National Housing Trust Fund (HTF)

States, large cities, and sometimes counties that receive money from any of these grants must develop a ConPlan at least once every five years. In addition to this long-term Strategic Plan, jurisdictions also develop Annual Action plans which detail how funds will be spent to address issues identified in the Strategic Plan. The regulations which inform this process are found in 24 CFR Parts 91 and 570 Consolidated Plan Revisions and Updates.

ConPlan Key Steps

1. Identifying Needs

Public hearings on community development and housing needs are required by law. This hearing is required to take place before a draft ConPlan is published for public comment. Often this stage also includes consultation with local housing and social service providers (Technical Assistance Collaborative, 1999), as well as analysis of data provided by HUD and other local sources.

2. Proposed ConPlan/Annual Action Plan

The jurisdiction must provide public notice, often in a newspaper, that a draft ConPlan is available for public comment. Public copies must be made available for review, either in public places like libraries or posted online for public review. Regulations require at least one public hearing during this phase of plan development, and the jurisdiction is required to tell the public how much money it expects to receive, a general idea of the uses for that money, and the estimated amount of money which will benefit low-income people. At the very least, the public must have at least 30 days to review and provide written or oral comments on the draft plan.

3. Final ConPlan/Annual Action Plan

The Final ConPlan must consider the public comments provided on the proposed plan, and give a detailed report on why any suggestions were not incorporated into the final plan. The final plan must be submitted to HUD 45 days before the start of a grantee's program year.

The final plan is submitted online through the Integrated Disbursement and Information System (IDIS), where it is reviewed by HUD. HUD can disapprove of a plan for a number of reasons including:

- If public participation is lacking
- If appropriate consultation was not completed with social service organizations
- If any certifications (discussed below) are found to be inaccurate

4. Annual Performance Report

Completed at the end of every program year, the Annual Performance Report details what the jurisdiction did to meet the housing and community development needs identified by the ConPlan. The Annual Performance Reports must also be made available to the public for review, and comments must be collected and reported prior to submission to HUD. This submission also takes place in the IDIS system.

5. ConPlan Amendments

The final step of the ConPlan process is only necessary if the ConPlan requires changes to community priorities, uses of funds, or the purpose, location, scope or beneficiaries of an activity. Depending on whether the jurisdiction considers the amendment to be “substantial”, they may be required to complete another public review and comment period; however, regulations allow the jurisdiction to determine what constitutes a “substantial change”.

ConPlan Key Documents

The ConPlan, perhaps confusingly, is comprised of several key documents which have their own individual requirements, purposes, and formats. A brief description of each of the four parts of the ConPlan is included below:

1. Housing and Community Development Needs Assessment

A primary requirement of the ConPlan is to estimate the housing needs for the next five-year period. The Needs Assessment is required to reflect public participation and comments, and be informed by consultation with local service providers. This part of the ConPlan must estimate housing needs by income category, family type and tenure (renter vs. owner). It also must estimate housing needs for persons with HIV/AIDS, survivors of domestic violence, sexual assault and stalking, and persons with disabilities (Gramlich, 2001b). Other data elements deal with the prevalence of housing cost burden, housing quality, and needs by race/ethnicity. This assessment must also include details on the nature and extent of homelessness in the jurisdiction.

2. Citizen Participation Plan

In addition to requirements for public participation included throughout the ConPlan process, each jurisdiction must create and make publicly available a citizen participation plan. The plan should include how the jurisdiction will encourage public involvement in the

creation of the ConPlan and Action Plan. It should specifically address how low-income people will be encouraged to engage in the process.

3. Housing Market Analysis

The Housing Market Analysis requires inclusion of data related to the supply and demand of housing, as well as the condition and cost of currently available housing stock. This section also requires a full inventory of homeless and supportive housing facilities, as well as publicly subsidized units and public housing. A jurisdiction's Public Housing Authority plays a large role in the completion of this section.

4. The Strategic Plan

The Strategic Plan is the five-year long-term plan which outlines the jurisdiction's general priorities. These priorities will be used to justify the disbursement of HUD block grants. These priorities are intended to be both geographical and needs-based in nature. The Strategic Plan must include why a particular group was given priority, drawing on analysis completed for the Housing and Community Needs Assessment and Housing Market Analysis. Each priority must include specific objectives and proposed accomplishments with measurable outcomes, target dates of completion, and intended impact on the housing market. Other elements of the strategic plan address the following categories:

- Homelessness
- Supportive housing
- Anti-poverty strategies
- Lead paint hazards
- Public housing residents
- Institutional structures
- Barriers to affordable housing
- Coordination
- Low-income housing tax credits
- Neighborhood revitalization strategies.

The priorities developed in the strategic plan guide the distribution of federal funds for the next five years and is thus a powerful tool in shaping a community's housing programs and services.

5. The Action Plan

The Action Plan is a one-year plan that details how a jurisdiction will work towards Strategic Plan objectives during that program year. The Action Plan requires a list of all HUD, state, local, and private resources that can be used to meet identified housing and community development needs for the program year. The Action Plan also includes information on the activities planned for the upcoming year. Notably, the Action Plan follows an old rule by which jurisdictions must provide sufficient detail that people can understand the degree to which they will be impacted by the jurisdiction's upcoming actions. In addition to specific elements that address homeless needs, the Action Plan also requires a number of certifications. Jurisdictions must certify that they are in compliance with:

- Affirmatively Furthering Fair Housing requirements
- Section 3 Jobs requirements
- Their own Citizen Participation Plan

- Their own Anti-Displacement Plan
- Their Public Housing Authority Plan

Ways to Get Involved

1. **Review Current Reports and Plans** - Current ConPlan and Action Plan documents should be publicly available for your review. Use time between ConPlan processes to familiarize yourself with the document and the information included. The Consolidated Annual Performance and Evaluation Report (CAPER) is a jurisdiction's annual performance report and can also provide insight into the current state of federal spending in your area.
2. **Participate in ConPlan Review Processes** - Participation in the ConPlan review process includes two main avenues for feedback. First, provide comments on any and all public drafts. Be prepared with comments as review windows can sometimes be incredibly tight. Second, participate in public hearings associated with the ConPlan. Prepare statements that discuss the current housing needs, housing barriers, and available housing resources for survivors in your community.
3. **File Complaints with HUD** - If a jurisdiction is not following its Citizen Engagement Plan, or following any number of regulations related to the ConPlan, file a complaint with HUD. This is the right of any citizen who feels that a jurisdiction is not following stated regulations.
4. **Document Survivor Housing Needs** - Collect and provide supplementary data and information to help make the case for the housing needs of survivors. Every jurisdiction must include information on how survivors housing needs are being addressed, and DV service providers and coalitions are the best organizations to provide this data. Even if not asked to provide information, an organization can provide data documenting survivor housing needs during public comment periods and hearings.
5. **Identify survivor barriers** - Prepare remarks and comments that address housing barriers that affect survivors. While the ConPlan relies heavily on quantitative data, compelling statements from service providers identifying current barriers to accessing affordable housing are just as relevant as quantitative information. Come prepared to public hearings with key talking points on some of the barriers that impact survivor housing access.
6. **Developing Strategy Proposals** - Utilize the ConPlan comment period and public hearings to publicize and highlight new strategies for how ConPlan resources could be used to expand survivor housing opportunities. Familiarize yourself with the ConPlan's funding streams and current projects in your community and identify existing or new programs which could have a positive impact on survivors. You can also look for organizations that are currently funded through the ConPlan and identify future partnership opportunities.
7. **Mobilize Survivors**-The ConPlan is meant to reflect the voices of those who are served by the HUD funds - namely low-income individuals. Survivors should be encouraged to tell their own stories in their own words and provide insight into how they'd like to see these funds distributed. These decisions impact programs that serve survivors; it is their right to provide feedback on the ConPlan and Annual Action Plan.

Appendix B: Application Exercise (Delaware Coalition Against Domestic Violence)

The Delaware Coalition Against Domestic Violence (DCADV) has not been involved in their ConPlan in the past. As such, they provide an opportunity to analyze, through a hypothetical exercise, whether the ConPlan could provide an effective avenue for expanding their housing advocacy efforts.

Housing Program Overview

The Delaware Coalition Against Domestic Violence (DCADV) was founded in 1994 as the state's federally recognized domestic violence coalition. While DCADV's housing program is recognized for its housing advocacy efforts focused predominately on their Continuum of Care (CoC), they have not yet been involved in their state's ConPlan process. DCADV is currently comprised of twelve full-time staff who work on a variety of systems-level advocacy initiatives across the state. As a relatively small state, the Delaware Coalition has only four member organizations, all of which are private nonprofit organizations that provide direct services to survivors of domestic violence. Only two of these four member organizations provide emergency shelter services ("Member Organizations," n.d.).

Similar to the Kentucky Coalition, the Delaware Coalition created a specific position tasked with assisting with ongoing state policy advocacy efforts. As part of this expansion, Marcey Rezac was hired as Policy Coordinator at the Coalition in 2017. While the Coalition understood the importance of expanding their housing offerings, Marcey was not hired to focus only on housing. Initially, her position assisted the Policy Director with a variety of policy topics, but Marcey came to the position with more than 20 years' experience in residential domestic violence services (*Marcey Rezac, Feb 22, 2021*) and quickly drew on her experience to expand her focus on housing. In addition to her deep experience in survivor services, Marcey's past experience meant that she entered the Coalition position with a strong network of contacts in the domestic violence, housing, and homelessness systems. For example, in her previous position, Marcey was a member of Delaware's CoC Board and was able to continue to serve on the board after joining the Coalition (*Marcey Rezac, Feb 22, 2021*).

The Delaware Coalition's housing program relies heavily on their CoC to connect their advocacy team to "mainstream" housing and homelessness agencies, as well as other advocacy groups. Focusing efforts on the CoC is in line with the form and function of the Delaware Coalition. Unlike the Kentucky Coalition, DCADV does not act as a federal funding "pass-through" for member organizations. This means that individual member organizations apply individually to funders for grants, and DCADV is not involved. Instead, DCADV serves in a facilitative role, ensuring that member organizations have the knowledge they need to apply to and manage awarded grants, but not proactively attempting to steer how those

funding streams get allocated. Like other DV organizations, DCADV emphasizes CoC-based advocacy while focusing less on other federal housing programs. Another arm of DCADV's housing advocacy efforts is led directly by DCADV, through their Domestic Violence Coordinated Community Response Task Force. This task force includes a housing subcommittee attended by domestic violence advocates, legal representatives, and two state housing authorities (*Marcey Rezac, Feb 22, 2021*). The Housing Subcommittee provides an additional opportunity for DCADV to collaborate with advocates across the state.

It is through the Housing subcommittee and the CoC that DCADV has a direct line to the Delaware Housing Authority, the party responsible for the completion of the ConPlan. Through this coordination work, DCADV has built a relationship with the ConPlan lead agency, while not being involved in the ConPlan itself. Additionally, while not included in the ConPlan, DCADV has provided data and input for other plans and reports created by the Delaware Housing Authority that influence housing across the state. This raises questions about the utility of ConPlan involvement for DCADV and organizations in similar positions, i.e., closely engaged with housing leaders and groups such as the CoC but not the ConPlan itself. A better understanding of Delaware's current ConPlan process is necessary to understand if and in what context engagement with the ConPlan would benefit DCADV's advocacy efforts.

The ConPlan Applied

The Delaware Housing Authority just completed a 5-Year Strategic Plan in the Fall of 2020. According to Marlena Gibson, the Director of Policy & Planning at the Delaware Housing Authority, this year's ConPlan "got really derailed by the COVID-related shutdowns and crisis and chaos" (*Marlena Gibson, Jan 10, 2021*). In a normal year, the Delaware Housing Authority completes the ConPlan, opting to coordinate the process internally rather than hiring an outside consultant. The Housing Authority is responsible for a number of other planning processes, including a housing needs assessment and required Public Housing Authority plans. In Delaware's current ConPlan, DCADV is not listed as a participating agency, despite requirements to include estimates of the number and type of families in need of housing assistance who are victims of domestic violence, dating violence, sexual assault and stalking. Instead, this data was provided by the Delaware Domestic Violence Coordinating Council, a state agency legislatively created to improve Delaware's response to domestic violence and sexual assault, but not affiliated with DCADV.

Utilizing the Key Takeaway from the Kentucky Case, the following exercise will review the ConPlan engagement strategies best suited to expanding DCADV's advocacy via the ConPlan process. The intention of this exercise is to demonstrate why the ConPlan presents a unique opportunity to organizations like DCADV who already have established relationships with stakeholders across the homelessness and housing sectors.

1. Housing Advocacy Requires a Dedicated Position:

In Marcey's work as a Policy Coordinator, she reports spending at least 50% of her time working on issues related to housing, therefore DCADV has already accomplished this recommendation. While Marcey's focus on housing was not the initial intention of her position, through her background in domestic violence housing she has been able to expand this part of her role. Marcey noted that adding the ConPlan to her repertoire fits nicely with the tasks she already completes (*Marcey Rezac, Feb 22, 2021*).

2. Focus on Building Relationships:

Marcey's engagement with the CoC and housing subcommittee, combined with her connections from her past experience as a Program Director, have resulted in strong relationships across the domestic violence, housing and homelessness systems. Marlena, from Delaware Housing Authority confirmed their positive working relationship, noting that much of the progress on housing accomplished by DCADV has been due to Marcey's efforts. With the reconvening and expansion of DCADV's Housing Subcommittee, as well as their CoC work, the ConPlan likely wouldn't result in any groundbreaking changes to their ongoing relationship building work. Still, the ConPlan can offer an additional avenue for DCADV to work alongside Delaware Housing Authority and garner goodwill with a major housing funder in the state.

3. Learn to Speak the Language:

DCADV already speaks the homelessness and housing language, but many of their member agencies do not. While DCADV is not a "pass through" agency for housing funds, they do provide technical assistance for their member agencies working on grant applications etc. In this capacity DCADV has considerable opportunity to assist direct-service organizations in identifying and applying for new funds to serve survivors. Adding the ConPlan as an area of expertise would allow DCADV to pass that knowledge on to their member organizations. Marcey noted that there has been a hesitancy across some of their member organizations to get involved in what is often perceived as the arduous HUD system; however, through demystifying the ConPlan process, DCADV could provide their member organizations access to an entirely new opportunity for impact.

4. Build Trust by Demonstrating Capacity:

DCADV does not currently administer any funds or provide direct-service programming to providers. This is in line with the conventional approach of state domestic violence coalitions. While taking on additional administrative work may not be within the current mission of the Coalition, by slowly building capacity through small projects (even those not funded through the ConPlan process), DCADV can begin to build a name for themselves within the more mainstream housing system. For example, partnering with the Housing Authority to provide training at all of their properties could create an opportunity not just for education, but for DCADV to interact with property managers and housing professionals. This recommendation

does not require engagement with the ConPlan itself, but helps to create the foundation off which DCADV is more likely to be called into the ConPlan process.

5. Use Data and Storytelling to Communicate Needs:

Despite a strong relationship with the Delaware Housing Authority, DCADV was not included in the most recent Delaware ConPlan, even though the regulations require reporting on elements related to survivors and survivor housing within their jurisdiction. This is troubling, as DCADV is the state domestic violence coalition responsible for organizing and advocating on behalf of the direct-service organizations who serve Delaware's survivors on a daily basis. The data included in the 2020-2024 ConPlan focuses on metrics that are available to the Delaware Domestic Violence Coordinating Council, namely the number of reported domestic violence criminal incidents and the number of women and children sheltered statewide for domestic violence. While there is no reason to doubt the accuracy of this data, by not engaging with the ConPlan DCADV has missed a critical opportunity to not only provide information, but more importantly to help craft the narrative around survivor housing needs.

6. Understand your Context:

DCADV does not provide services or administer funding. They are already plugged into the housing advocacy efforts that easily align with domestic violence housing needs and goals. That being said, the ConPlan represents an opportunity for increased engagement with funding streams that domestic violence organizations have historically overlooked. By engaging with the ConPlan, DCADV gains a strategic advantage by providing comments and feedback during a process that tends to lack participation. Marlena from the Delaware Housing Authority indicated that understanding and interacting with the ConPlan process is often underestimated by advocacy groups, stating: "If we're having three public hearings a year and someone from an organization comes to every single one or sends a comment letter, like a well thought out data-supported comment letter, with a specific thing that they want done... those do get attention and can spark change, and I think people sometimes underestimate the importance of doing that" (*Marlena Gibson, Jan 10, 2021*). By participating in the next 5-Year Strategic Plan process, or even the next Annual Action Plan process, Marcey and DCADV could bolster existing relationships, expand their advocacy reach, and potentially utilize an underappreciated process to make real change.

Appendix C: List of Interview Subjects

Kentucky Coalition Against Domestic Violence Case Study

- Kenzie Strubank, *Homeless Programs Manager* at Kentucky Housing Corporation
- Marjorie Willow, *Principal* at Mullin & Lonergan Associates, Inc.
- Curtis Stauffer, *Managing Director of Housing Contract Administration* at Kentucky Housing Corporation
- Andrea Miller, *Economic Justice Services Coordinator* at Kentucky Coalition Against Domestic Violence
- Mary O'Doherty, *Executive Director* at Ohio Domestic Violence Network

Delaware Coalition Against Domestic Violence Application Exercise

- Marlena Gibson, *Director of Policy & Planning* at Delaware State Housing Authority
- Marcey Rezac, *Policy Coordinator* at Delaware Coalition Against Domestic Violence