

ILLINOIS HOUSING AUTHORITY REPORT

Housing Supports and Solutions for Survivors of Gender-Based Violence



About this Report

Survivors of gender-based violence (“GBV”) face many barriers when trying to find and apply for safe housing. In Illinois, there are over 100 Public Housing Agencies (“PHAs”) that run subsidized housing programs in their areas, including the Housing Choice Voucher (“HCV”), Project-Based Voucher (“PBV”) and Public Housing programs. Between June and September of 2023, The Network: Advocating Against Domestic Violence connected with PHAs statewide to get a better understanding of the landscape of subsidized housing options available to survivors of GBV and determine whether these options were easily accessible.

Our report and subsequent recommendations focus on five (5) primary factors which were identified based on trauma-informed practices and Department of Housing and Urban Development (“HUD”) guidance. These factors are often determinative regarding whether survivors of GBV can access safe housing. We gathered information—by reviewing publicly-available resources and engaging in individual dialogue with PHAs—to assess open housing waitlists, preferences for survivors, Violence Against Women Act (“VAWA”) Emergency Transfer Plans, reasonable accommodations, and language access options. Through this process, we evaluated the barriers survivors may face when trying to access housing options. In this report, we provide concrete recommendations for PHAs that are looking to improve their current services and practices for survivors of GBV.

Evaluation Factors

1.) Open Waiting Lists:

Waiting lists are often the first door that an individual or family must make it through in order to secure housing through a PHA. When an applicant wishes to enter subsidized housing, they submit the required application(s) and documentation to the PHA and are then placed on a waiting list. These waiting lists abide by certain HUD regulations and serve as the mechanism through which housing offers are made to applicants.¹ When a PHA determines that a waiting list contains a sufficient number of qualified applicants, the PHA may close the list and reopen it a later date.²

This evaluation point reflects whether the PHA **had any open waiting lists at the time of contact**. These waiting lists may be for several different types of public housing including HCV or PBV. A PHA received up to one point if any waiting lists were open. However, no points were awarded if the only open waiting list was reserved for seniors or people with disabilities. Because waiting lists are often changing, the Network recommends that interested applicants or service providers confirm with the PHA to ensure that their waiting list(s) remains open at the time of viewing this report.

2.) Preferences & Prioritization:

A community's housing needs are often much greater than the housing resources that are available within that area. Waiting lists for subsidized housing programs can sometimes be several months or even years long. For survivors of GBV, who are subject to multiple, often intersecting vulnerabilities, lengthy waiting lists are major impediments towards achieving safe and stable housing. Recognizing that community need often outpaces available resources, PHAs have authority to develop "local preferences" that prioritize certain individuals and families.³ These preferences help to move those individuals and families to the top of the waiting list sooner than they would if the waiting list was managed solely chronologically (i.e., first come, first served).

This evaluation point reflects whether the PHA has a policy of providing a **local preference that prioritizes survivors of gender-based violence**. Local preferences help provide survivors with greater housing opportunities which in turn improves their safety, independence, and housing stability. If a PHA had a preference for any type or survivor of GBV, it received up to one point.

3.) VAWA Emergency Transfer Plan:

VAWA is a federal law that provides affirmative housing protections for survivors of GBV.⁴ HUD requires that PHAs develop and implement a VAWA Emergency Transfer Plan.⁵ This transfer plan is typically based on the "Model Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking" published by HUD in 2017 and expected to be updated in 2024.⁶ The purpose of a transfer plan is to ensure that survivors of GBV are able to safely relocate while maintaining their subsidy.

Each VAWA Emergency Transfer Plan is required to provide survivors of GBV with access to move when they: 1) request the emergency transfer; and 2) reasonably believe that they are at risk of further, imminent harm by remaining in their home.⁷ Survivors can also transfer if they were the victim of a sexual assault that occurred in their home within 90 calendar days of requesting the transfer.⁸ The emergency transfer plan additionally provides survivors with confidentiality protections and specifies what kind of documentation a PHA can request from a survivor. VAWA requires PHAs to make their transfer plan available upon request and recommends it to be publicly available.⁹

This evaluation point reflects whether a PHA had a publicly-available emergency transfer plan. **If the emergency transfer plan was publicly available** (either on a website or by request), the PHA received up to one point.

4.) Reasonable Accommodations:

Federal, state, and local anti-discrimination laws require that PHAs allow reasonable accommodations in rules, policies, practices, or services where such an accommodation would be necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling or public/common use area.¹⁰ Reasonable accommodations allow tenants with disabilities to fully access and enjoy their housing by removing barriers caused by a disability. Denial of an accommodation can be disability discrimination.¹¹

Reasonable accommodations are necessary to ensure that all survivors of GBV have equal access to safe housing. These protections are especially important for survivors to protect against further traumatization. Examples of reasonable accommodations include: allowing individuals to submit applications or payments via mail; providing reserved handicap-accessible parking spaces; allowing service animals in units that typically do not allow animals; and ensuring that information is available in large-font formats.

This evaluation point reflects **whether the PHA made information related to reasonable accommodations publicly available and if a PHA had information on its website or in public plans about how to request an accommodation.** If so, it received up to one point.

5.) Language Access Information for Tenants with Limited English Proficiency:

Lack of language access can be a significant barrier to survivors with limited English proficiency (“LEP”), and housing providers that receive federal funds (like all PHAs in Illinois) are required to take reasonable steps to ensure meaningful language access in their programs.¹² Failure of the PHA to create meaningful language access may be considered a form of discrimination on the basis of national origin or a violation of Title VI of the Civil Rights Act.¹³ Meaningful language access will vary, based on the population that the PHA serves, but common services include oral interpretation and written translation to the speaker’s preferred language.

Measures designed to improve access for those with LEP are necessary to ensure that survivors of all backgrounds and nationalities have equal enjoyment and participation in PHA programs. Survivors with LEP face unique challenges and vulnerabilities and access to language accommodations can help to mitigate those issues. This evaluation point reflects **whether the PHA took reasonable steps to ensure meaningful language access, and if it had information available on its website or in public plans about language access.** If so, it received up to one point.

Notes on scoring:

Website vs. Phone contact:

Many PHAs across the state do not have websites. For PHAs without websites, we contacted (or attempted contact) over the phone. Requiring applicants to call in order to gather information works to limit the accessibility of that information. In order to recognize this, we limited the potential score in each category to one-half point (0.5) for those PHAs that did not have the information we sought on a website.

Missing Data:

Some of the information we sought was not available at the time of publication of this report. In order to reflect this, we marked those areas as **Not Available (“N/A”)**. Two PHAs refused to provide us with the data we sought. Those areas are marked as **Refused (“R/F”)**.

Evaluation Factors:

“Open WL” = Open Waitlist

“Prefs” = Local preference with survivor prioritization

“VAWA E.T.P.” = Violence Against Women Act Emergency Transfer Plan

“R.A.” = Reasonable Accommodations

“L.E.P.” = Limited English Proficiency

References:

1. See, e.g., 24 C.F.R. § 982.204
2. See, e.g., 24 C.F.R. § 982.206
3. See, e.g., 24 C.F.R. § 982.207; 24 C.F.R. § 960.206
4. 34 U.S.C. § 12491 et seq.; 24 C.F.R. § 5.2001 et seq.
5. 34 U.S.C. § 12491(e); 24 C.F.R. § 5.2005(e)
6. *Model Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking*, HUD, available at <https://www.hud.gov/sites/documents/5381.docx>
7. 34 U.S.C. § 12491(e)(1)(B)(i); 24 C.F.R. § 5.2005(e)(2)(ii)(A)
8. 34 U.S.C. § 12491(e)(1)(B)(ii); 24 C.F.R. § 5.2005(e)(2)(ii)(B)
9. 24 C.F.R. § 5.2005(e)(11)
10. See generally, *Reasonable Accommodations and Modifications*, HUD, available at https://www.hud.gov/program_offices/fair_housing_equal_opp/reasonable_accommodations_and_modifications
11. *Id.*
12. See generally, *Limited English Proficiency*, HUD, available at https://www.hud.gov/program_offices/fair_housing_equal_opp/limited_english_proficiency_0#Obligations
13. *Id.*

Recommendations for Future Improvement

The first area most PHAs can improve is making their VAWA emergency transfer plans publicly available and customized to the area they serve. Many PHAs did not have an available plan, which was concerning, given VAWA requirements that PHAs must have a plan available upon request. For each PHA that had a plan, it was heavily based on HUD's Model Plan, and many appeared to simply cut/paste the model without tailoring it to their agency and community. Some PHAs did include links/information for localized domestic violence resources such as shelters and other organizations in their plan. Moving forward, The Network recommends all plans be made publicly available and that PHAs complete greater customization and localization of the emergency transfer plans to ensure that the specific needs of each community are identified and met. In addition to the categories covered in the model plan, VAWA Emergency Transfer Plans should, at the very least, provide survivors with: 1) specific contact information for the person who processes transfers; 2) timelines for how long to expect the process to take; 3) information on ways to request a transfer; 4) PHA-specific information about PHA confidentiality and bifurcation processes; 5) a way to follow up to confirm that the request for transfer was properly received; 6) a process for survivors to identify how the PHA can contact them safely and securely after a request is made; and 7) any partnerships with external housing providers in the event that the PHA does not have a safe unit available.

Second, PHA's often include VAWA Emergency Transfer Plans and information on reasonable accommodations or language access in their Admissions and Continued Occupancy Policy or in their Administrative Plans. These documents are typically *hundreds of pages long*, which makes the information very difficult to find. The Network encourage PHAs to **publish their VAWA Emergency Transfer Plans as separate documents in order to ensure survivors have easy access** to them, preferably in a dedicated area of their website. Additionally, we encourage PHA's to make information about reasonable accommodations and language access more easily accessible, such as on dedicated pages on their websites.

In order to improve the quality of service that PHAs provide survivors of GBV, we further recommend that PHAs strive to have **dedicated staff responsible for assisting survivors through their application process**, in instances where GBV occurs on the PHA's property, and in cases where survivors need to request a VAWA emergency transfer or additional support. We further recommend that PHAs strive to **adopt specialty projects for survivors of GBV**. These projects can help to target particular populations who may be in need of additional resources or community referrals.

EVALUATION POINTS

Public Housing Authority	Open WL	Prefs	VAWA E.T.P.	R.A.	L.E.P.
Housing Authority of Adams County	1	0	N/A	N/A	N/A
Alexander County Housing Authority	1	0	1	1	1
Alton Housing Authority	N/A	N/A	N/A	N/A	N/A
The Aurora Housing Authority	0.5	0	0	1	1
Housing Authority of the City of Bloomington	0.5	0	0	1	1
Housing Authority of the County of Bond	1	0	0	1	0
Housing Authority of the County of Boone	0.5	1	1	1	1
Housing Authority of the County of Brown	1	0	1	1	1
Bureau County Housing Authority	0.5	0	N/A	N/A	N/A
Housing Authority of Calhoun County	N/A	N/A	N/A	N/A	N/A
Carroll County Housing Authority	0	0	0	1	1
The Housing Authority of the County of Cass	1	0	0	0.5	0.5
Housing Authority of Champaign County	0	0	1	1	1
Chicago Housing Authority	1	1	1	1	1
Housing Authority of Christian County	1	0	0.5	0.5	0.5
Housing Authority of the Town of Cicero	0	0	N/A	N/A	N/A
Housing Authority of the County of Clark	0.5	0	N/A	N/A	N/A
Clay County Housing Authority	0.5	0.5	N/A	N/A	N/A

EVALUATION POINTS

Public Housing Authority	Open WL	Prefs	VAWA E.T.P.	R.A.	L.E.P.
Housing Authority County of Coles	0.5	0	N/A	N/A	N/A
Housing Authority of Cook County	0	1	0	1	1
Housing Authority of the County of Cumberland	0.5	0	N/A	N/A	N/A
Decatur Housing Authority	1	0	0	0	0
Housing Authority Of The County Of DeKalb	1	0	1	1	1
DeWitt County Housing Authority	N/A	N/A	N/A	N/A	N/A
DuPage Housing Authority	0	1	1	1	1
East Peoria Housing Authority	0	0	0	1	0
The Housing Authority of City of East St. Louis	N/A	0	0	1	1
Housing Authority of Edgar County	0.5	0.5	0	0.5	0.5
Edwards County Housing Authority	R/F	R/F	R/F	R/F	R/F
Effingham County Housing Authority	0.5	0	0	0.5	0.5
Housing Authority of Elgin	0	0	0	0	0
Housing Authority of the County of Ford	N/A	N/A	N/A	N/A	N/A
Housing Authority of the County of Franklin	0.5	0	N/A	N/A	N/A
Housing Authority of the City of Freeport	1	0	0	1	1
Fulton County Housing Authority	0.5	0.5	0.5	0.5	0.5
Housing Authority of Gallatin County	0.5	0	N/A	N/A	N/A

EVALUATION POINTS

Public Housing Authority	Open WL	Prefs	VAWA E.T.P.	R.A.	L.E.P.
Granite City Housing Authority	1	0	0	1	0
Housing Authority of Greene County	0.5	0	0.5	0.5	0.5
Grundy County Housing Authority	N/A	0	1	1	1
Hamilton County Housing Authority	N/A	N/A	N/A	N/A	N/A
Hancock County Housing Authority	0.5	N/A	N/A	N/A	N/A
Housing Authority of Henry County	1	1	1	1	1
Housing Authority of the County of Jackson	1	1	1	1	1
Housing Authority of Jefferson County	0.5	0	N/A	N/A	N/A
Housing Authority of the County of Jersey	0.5	0	0.5	0.5	0.5
Housing Authority of the County of JoDaviess	1	0	0	0	0
Housing Authority of Johnson County	0.5	0	0	0.5	0.5
Housing Authority of Joliet	1	0	0	0	0
Kankakee County Housing Authority	1	0	1	1	1
Kendall Housing Authority	0	1	1	1	1
Knox County Housing Authority	N/A	1	1	1	1
Housing Authority for LaSalle County	1	1	1	1	1
Housing Authority of the County of Lawrence	N/A	N/A	N/A	N/A	N/A
Lee County Housing Authority	0.5	0.5	0	0	0

EVALUATION POINTS

Public Housing Authority	Open WL	Prefs	VAWA E.T.P.	R.A.	L.E.P.
Livingston County Housing Authority	0.5	0	N/A	N/A	N/A
Logan County Housing Authority	0.5	0	N/A	N/A	N/A
Macoupin County Housing Authority	1	0	0	0	0
Madison County Housing Authority	1	0	0	0	0
Marion County Housing Authority	1	0	0	0	0
Mason County Housing Authority	N/A	N/A	N/A	N/A	N/A
Massac County Housing Authority	1	1	0	0	0
Housing Authority of the County of McDonough	1	1	1	1	1
McHenry County Housing Authority	1	0	0	1	1
Menard County Housing Authority	1	0	1	1	1
Mercer County Housing Authority	0.5	0.5	0.5	0.5	0.5
Moline Housing Authority	1	0	0	1	1
Montgomery County Housing Authority	1	0	0	0	0
Morgan County Housing Authority	N/A	0	0	0	0
Housing Authority of Mt. Vernon	1	0	0	0	0
Housing Authority of the City of North Chicago	1	1	1	1	1
Housing Authority of the Village of Oak Park	0	0	0	0	0
Ogle County Housing Authority	1	0	0	0	0

EVALUATION POINTS

Public Housing Authority	Open WL	Prefs	VAWA E.T.P.	R.A.	L.E.P.
Housing Authority of Park Forest	0	0	N/A	N/A	N/A
Housing Authority of the City of Pekin	1	0	1	0	0
Peoria Housing Authority	1	0	1	1	1
Perry County Housing Authority	N/A	0	0	0	0
Housing Authority of Piatt County	N/A	N/A	N/A	N/A	N/A
Pike County Housing Authority	1	1	1	1	1
Housing Authority of Pope County	1	0	0	0	0
Housing Authority of Pulaski County	1	0	0	0	0
Quincy Housing Authority	1	0	0	0	0
Randolph County Housing Authority	0.5	0	N/A	N/A	N/A
Housing Authority of the County of Richland	1	0	0	0	0
Grtr. Metro. Area Housing Auth. of Rock Island County	1	0	1	1	0
Rockford Housing Authority	0	1	1	1	1
Housing Authority of the County of Saline	N/A	N/A	N/A	N/A	N/A
Scott County Housing Authority	N/A	N/A	N/A	N/A	N/A
Housing Authority of the County of Shelby	0.5	0	0.5	0.5	0.5
Springfield Housing Authority	1	0	1	1	1
St. Clair County Housing Authority	1	1	1	1	1

EVALUATION POINTS

Public Housing Authority	Open WL	Prefs	VAWA E.T.P.	R.A.	L.E.P.
Housing Authority of the County of Union	0.5	0	N/A	N/A	N/A
Housing Authority of the County of Vermilion	1	0	1	0	0
Housing Authority Of The County Of Wabash	R/F	R/F	R/F	R/F	R/F
Warren County Housing Authority	0.5	0.5	N/A	N/A	N/A
Housing Authority of the City of Waukegan	0	0	0	0	0
Housing Authority Of The County of Wayne	1	0	N/A	N/A	N/A
White County Housing Authority	1	0	0	0	0
Whiteside County Housing Authority	1	0	0	0	0
Winnebago County Housing Authority	1	1	1	1	1
Woodford County Housing Authority	1	0	0	0	0

If you are an Illinois Housing Authority and you would like to connect with The Network about the information in this report, please contact us at jkoriath@the-network.org