



Implementing VAWA 2022 Eligible Costs Under the CoC Program

Background and purpose

The Violence Against Women Act (VAWA) is a federal law that, in part, provides housing protections for people applying for or living in units subsidized by the federal government who have experienced domestic violence, dating violence, sexual assault, or stalking, to help keep them safe and reduce their likelihood of experiencing homelessness. VAWA applies to many HUD programs, including the Continuum of Care (CoC) and Emergency Solutions Grant (ESG) Programs. More information is available on [HUD's VAWA page](#).

The VAWA Reauthorization Act of 2022 (VAWA 2022) both renewed and expanded VAWA's protections for people fleeing domestic violence, dating violence, sexual assault, and stalking. VAWA 2022 also amended the McKinney-Vento Homeless Assistance Act to add a new eligible CoC Program activity related to facilitating emergency transfer requests and monitoring compliance with VAWA confidentiality provisions. More information is available in [HUD's "Housing Provisions of the Violence Against Women Act Reauthorization Act of 2022" letter to CoC and ESG recipients](#).

This document provides guidance on implementing VAWA 2022's new eligible costs under the CoC Program. It includes:

- A comprehensive list of eligible costs
- Information about incorporating those costs into new, renewal and Youth Homelessness Demonstration Program (YHDP) projects
- Guidance on putting eligible cost categories into practice with sample allowable activities for each category

Eligible costs

VAWA 2022 adds the following eligible activity to the CoC Program (referred to in this document as the "VAWA budget line item"): facilitating and coordinating activities to ensure compliance with the emergency transfer plan requirement in 31 USC 12491(e) and monitoring compliance with the confidentiality protections in 34 USC 12491(c)(4).¹

The VAWA budget line item offers increased flexibility in serving victims of domestic violence, dating violence, sexual assault, and stalking. It includes tools to create high functioning emergency transfer plans and processes, dismantle barriers between participants and safe housing, and ensure CoCs and CoC Program recipients meet confidentiality needs and requirements.

The VAWA budget line item is distinct from the project administrative budget line item listed in the CoC Program interim rule². The VAWA budget line item is not subject to the CoC Program's spending caps on administrative costs. HUD will make a confirming change to the CoC Program interim rule to add the VAWA budget line item and provide further guidance at that time.

Examples of eligible costs for emergency transfer facilitation include the costs of assessing, coordinating, approving, denying, and implementing a survivor's emergency transfer, which includes:

1. **Assistance with moving costs.** Reasonable moving costs to move survivors for an emergency

¹ The VAWA Reauthorization Act of 2022, section 605(b)(2)

² 24 CFR 578.59

transfer.

2. **Assistance with travel costs.** Reasonable travel costs for survivors and their families to travel for an emergency transfer.
3. **Security deposits.** Grant funds can be used to pay for security deposits of the safe units the survivor is transferring to.
4. **Utilities.** Grant funds can be used to pay for costs of establishing utility assistance in the safe unit the survivor is transferring to.
5. **Housing fees.** Fees associated with getting survivors into a safe unit via emergency transfer, which includes but is not limited to application fees, broker fees, holding fees, trash fees, pet fees where the person believes they need their pet to be safe, etc.
6. **Case management.** Grant funds can be used to pay staff time necessary to assess, coordinate, and implement emergency transfers.
7. **Housing navigation.** Grant funds can be used to pay staff time necessary to identify safe units and facilitate moving into housing for survivors through emergency transfer.
8. **Technology to make an available unit safe.** Grant funds can be used to pay for technology that the survivor believes is needed to make the unit safe, including but not limited to doorbell cameras, security systems, phone and internet services when necessary to support systems for the unit, etc.

Examples of eligible costs for monitoring compliance with the VAWA confidentiality requirements include the costs of ensuring compliance with VAWA confidentiality requirements, which includes:

1. **Monitoring and evaluating compliance** with VAWA confidentiality requirements.
2. **Developing and implementing strategies** for corrective actions and remedies.
3. **Program evaluation** of confidentiality policies, practices, and procedures.
4. **Training on compliance** with VAWA confidentiality policies.
5. **Reporting** to the collaborative applicant, HUD, and other interested parties on compliance with VAWA confidentiality requirements.
6. Costs for **establishing methodologies** to protect survivor information.
7. **Staff time** associated with maintaining adherence to confidentiality requirements.

Including the VAWA budget line item in CoC Program projects

New projects and YHDP projects

The VAWA budget line item may be included in new project applications as detailed in the applicable Notice of Funding Opportunity (NOFO) and the New Project Detailed Instructions.

Renewal projects

The VAWA budget line item may be added to eligible renewal projects in the following ways:

- Through expansion as detailed in the applicable NOFO and the Renewal Project Detailed Instructions.
- By shifting up to 10 percent of funds from another eligible activity category into the VAWA budget line item. This shift is not considered a significant change and does not require prior HUD approval via a grant amendment, though the recipient should be aware that this change does not persist between grant years and therefore and will not, for example, appear on the

subsequent year's Grant Inventory Worksheet (GIW).

- By shifting more than 10 percent of funds from another eligible budget line item into the VAWA budget line item. This shift is a significant change and must be evidenced by a grant agreement amendment signed by HUD and the recipient. Recipients considering a significant change should submit a written request to their HUD Field Office. The written request should detail the nature of the change and the circumstances prompting the need for the change. Recipients can find their HUD Field Office contact via [HUD's local office directory](#).

Further information and assistance

The following resources are available to assist CoC Program recipients in implementing the VAWA budget line item:

- Policy questions, including questions about whether a given activity is eligible under the VAWA budget line item, may be submitted to your [HUD Field Office](#) or via the [Ask A Question \(AAQ\) on the HUD Exchange](#).
- Each CoC has an assigned point of contact from their technical assistance Regional Team. CoCs may request support directly from their Regional Team point of contact; CoC Program recipients may ask their CoC to submit a request for them. CoCs and CoC Program recipients can find their Regional Team point of contact via [HUD's Regional Teams page](#).
- Any CoC or CoC Program recipient may request HUD technical assistance, which is designed to provide resources, tools, and support for HUD funding recipients, via the "Request In-Depth Program Assistance" section on [HUD's Program Support page](#). CoCs and CoC recipients may also request HUD technical assistance through their [HUD Field Office](#).

Eligible activities by VAWA 2022 budget line item

This table highlights sample allowable activities for each VAWA budget line item eligible cost. It is not intended to be comprehensive or exclusive. As with all CoC Program costs, each listed activity must be reasonable, allocable, and appropriate. Activities must also be clearly tied to a budget line item; for example, sample activities listed under housing fees are only eligible if required to assess, coordinate, approve, deny, or implement a survivor’s emergency transfer. Cost eligibility in this section is not limited by a participant’s previous receipt of a similar benefit; for example, a participant may receive a security deposit under the VAWA 2022 budget line item even if they received an ESG-funded security deposit for a previous unit.

Eligible Cost	Sample Allowable Activities – VAWA 2022 Cost Category
Emergency transfer facilitation (assessing, coordinating, approving, denying, and implementing a survivor’s emergency transfer)	
Moving costs	Any cost that would otherwise be eligible under 24 CFR 578.53(e)(2), including renting a moving vehicle and hiring a moving company. Moving vehicle fuel. Temporary storage fees. Boxes and other disposable moving materials. Moving aids such as dollies.
Travel costs	Any reasonable travel cost for survivors and their families to travel for an emergency transfer. Renting a vehicle or arranging other transportation (bus, train, airplane) to the new unit, including vehicle costs such as fuel and mileage fees. Reasonable costs when required to facilitate longer-distance travel to a new unit.
Security deposits	Any cost that would otherwise be eligible under 24 CFR 578.51(a)(2). Cost eligibility is not limited by the disposition of any previous security deposit, including landlord retention of a previous security deposit.
Utilities	Any cost that would otherwise be eligible under 24 CFR 578.51(e)(16). The cost of utility arrears or other utility-related costs as required to establish utilities at the new, safe unit.
Housing fees	Any reasonable fee associated with getting a survivor into a safe unit via emergency transfer. Installation, maintenance, and replacement of locks or other security mechanisms such as deadbolts, physical barriers such as fences and gates, privacy items such as curtains and blinds, and other structures such as kennels necessary to the physical, emotional, or psychological health of household members or pets. Pet fees include deposits, non-refundable one-time fees, and recurring fees paid to the landlord, as well as costs associated with establishing an existing pet as an assistance animal such as licensure and signage. Post office box rental fees if the survivor requires a mailing address other than their physical address to conduct an activity necessary to achieving and maintaining safe housing such as complying with a child custody order or receiving a public benefit.
Case management	Any cost that would otherwise be eligible under 24 CFR 578(e)(3) as required to facilitate an emergency transfer. Assisting the survivor in re-establishing support systems such as behavioral healthcare, substance use treatment, and other critical social supports in their new, safe unit and its community. The cost of qualified staff to serve as mediator or the survivor’s proxy for communicating mandatory information between the survivor and their abuser such as information required by a child support order. Staff leave to prevent or recover from emotional or psychological trauma related to providing case management services to survivors, including direct services and management of direct service staff. This leave may be in addition to other leave that an employee might receive such as paid time off or sick leave and it may be provided on an as-needed basis using a methodology similar to bereavement leave; however, it must meet all applicable requirements under 2 CFR 200.431(b), including that it must be provided under established written leave policies. Staff time spent addressing participant grievances with the recipient’s emergency transfer process.
Housing navigation	Reasonable staff time costs necessary to identify safe units and facilitate moves into housing for survivors through emergency transfers. Establishing relationships with landlords to identify appropriate housing, maintaining relationships with landlords, developing/maintaining a database of properties and landlord contacts, collaborating and coordinating with other providers to identify and leverage participant strengths to achieve safe housing, developing and implementing training events for landlords, participating in community meetings related to creating, identifying, and securing housing for survivors.
Technology to make an available unit safe	Reasonable costs for technology to make an available unit safe. Electronic security infrastructure necessary to the safety of the participant such as secure email, enhanced internet security features, password management, etc. Actions necessary to preserve the safety of the participant by erasing their digital footprint such as takedown services for videos, photographs, or text that harm the physical or psychological safety of a household member.
Monitoring and ensuring compliance with the VAWA confidentiality requirements	

Eligible Cost	Sample Allowable Activities – VAWA 2022 Cost Category
Monitoring and evaluating compliance with VAWA confidentiality requirements	Includes evaluating the project, the project recipient, its partners, and other projects or organizations as necessary to ensure compliance. Includes the cost of compensating people with lived experience and expertise, including survivors, who participate in or otherwise contribute to monitoring and evaluation.
Developing and implementing strategies for corrective action and remedies	Includes time spent in consultation with experts on VAWA compliance and survivor housing such as victim services providers, state coalitions against domestic violence, and local and national advocacy organizations for victims of domestic violence, dating violence, sexual assault, and stalking. Includes the cost of compensating people with lived experience and expertise, including survivors, who participate in or otherwise contribute to developing and implementing strategies under this activity.
Program evaluation of confidentiality policies, practices, and procedures	Includes time spent in consultation with experts on VAWA compliance and survivor housing such as victim services providers, state coalitions against domestic violence, and local and national advocacy organizations for victims of domestic violence, dating violence, sexual assault, and stalking. Includes the cost of honorariums for survivors with lived experience and expertise who participate in or otherwise contribute to program evaluation.
Training on compliance with VAWA confidentiality policies	Includes costs of providing training and receiving training. Training does not need to be HUD-sponsored to be eligible. Includes the cost of compensating people with lived experience and expertise, including survivors, who provide or receive training.
Reporting on compliance with VAWA confidentiality requirements	Includes the cost of compensating people with lived experience and expertise, including survivors, who provide training and feedback on confidentiality policies and practices.
Establishing methodologies to protect survivor information	Includes costs associated with secure data matching between HMIS, HMIS comparable databases, and other data sources to improve services. Includes the cost of compensating people with lived experience and expertise, including survivors, who contribute to the methodology development and implementation process.
Staff time associated with maintaining adherence to confidentiality requirements	Includes staff leave to prevent or recover from emotional or psychological trauma related to receiving, managing, or reviewing policies related to domestic violence, dating violence, sexual assault, or stalking, or accounts of domestic violence, dating violence, sexual assault, or stalking, including but not limited to case notes and project-level activity summaries. This leave may be in addition to other leave that an employee might receive such as paid time off or sick leave and it may be provided on an as-needed basis using a methodology similar to bereavement leave; however, it must meet all applicable requirements under 2 CFR 200.431(b), including that it must be provided under established written leave policies. Staff time spent addressing participant grievances related to survivor information and confidentiality.