Annual PHA Plan
Annual PHA Plan
(Standard PHAs and Troubled PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB No. 2577-0226
Expires: 02/29/2016

A. PHA Information.

A.1 PHA Name: The Housing Authority to the City of Trenton
PHA Code: NJ005
PHA Type: ☒ Standard PHA ☐ Troubled PHA

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2021
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units 1423 Number of Housing Choice Vouchers (HCVs) 0
Total Combined Units/Vouchers 1423
PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission

Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

☐ PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)

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<tr>
<th>Participating PHAs</th>
<th>PHA Code</th>
<th>Program(s) in the Consortia</th>
<th>Program(s) not in the Consortia</th>
<th>No. of Units in Each Program</th>
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Lead PHA:

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

Y ☒ N ☐
☒ ☒ Statement of Housing Needs and Strategy for Addressing Housing Needs
☒ ☒ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
☒ ☒ Financial Resources.
☒ ☒ Rent Determination.
☒ ☒ Operation and Management.
☒ ☒ Grievance Procedures.
☒ ☒ Homeownership Programs.
☒ ☒ Community Service and Self-Sufficiency Programs.
☒ ☒ Safety and Crime Prevention.
☒ ☒ Pet Policy.
B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?

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See Attachment A

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.

B.3 Civil Rights Certification.

Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.

See Attachment B

B.4 Most Recent Fiscal Year Audit.

(a) Were there any findings in the most recent FY Audit?

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(b) If yes, please describe:
B.5 Progress Report.

Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

**THA continues to move forward toward meeting its Mission, Goals and Objectives:**
- **Toward the goal of increasing the supply of affordable housing,** the THA is currently working to complete the redevelopment of one of its non-performing properties. The new construction at Turner Pointe began in October 2019 and the first half of the property was completed and leasing commenced in October 2020. The remainder of the property is scheduled to be completed by December 2020. Another non-performing property is Frazier Court II (former Campbell Homes). The THA has submitted a RAD application to HUD to convert this property to Project Based Rental Assistance. The THA has conceptual architectural plans and are in the process of strategizing the financing for this project.
- **Toward the goal of improving the quality of assisted housing,** the THA has established a robust quality control and customer service feedback program. The THA reviewed the materials used in apartment units, resulting in the upgrade of new flooring and cabinetry products.
- **Toward the goal of promoting self-sufficiency,** the THA has received a HUD Family Self Sufficiency Program Coordinator grant. In connection with our Community and Supportive Services Plan, the THA has partnered with a number of local supportive services organizations to provide education, recreation and job training programs. The THA has implemented an aggressive Section 3 program designed to ensure that residents benefit from dollars being spent in connection with THA projects and programs.
- **Toward the goal of improving the living environment,** the THA upgraded trash compactors and compactor rooms at all Senior/Disabled buildings. Install landscape improvements at Wilson Homes, Haverstick Homes and Prospect Village. The THA began conducting a comprehensive assessment of its provision of site security services including an assessment of Security Personnel and an evaluation of current surveillance systems to ensure that the system is as efficient and effective as possible in the service of THA residents. THA has a current application in to HUD for an Emergency Safety and Security Grant. The THA recently upgraded the camera system and expanded on the security staff.
- **Toward the goal of ensuring equal opportunity in housing for all Americans,** the THA has established a regular training schedule for its staff in the areas of fair housing and equal opportunity.

B.6 Resident Advisory Board (RAB) Comments.

(a) Did the RAB(s) provide comments to the PHA Plan?

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(c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
**B.7 Certification by State or Local Officials.**

Form HUD 50077-3L, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

*See Attachment C*

<table>
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<th>B.8 Troubled PHA.</th>
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<td>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</td>
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(b) If yes, please describe:

| C. Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP). |

| C.1 Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD. |

See HUD Form 50075.2 approved by HUD on 04/27/2020.
ATTACHMENT A

New Activities

CHOICE Neighborhoods

Mixed Finance Modernization or Development

Demolition and/or Disposition

Conversion of Public Housing to Project-Based Assistance under RAD

Occupancy by Police Officers

Project-Based Vouchers

Units with Approved Vacancies for Modernization

Other Capital Grant Programs
Attachment A

B.2 New Activities

Choice Neighborhoods / Mixed Finance Modernization or Development

The Trenton Housing Authority will conduct an authority-wide portfolio analysis of its housing stock. THA will then develop plans to modernize and / or preserve its housing stock. THA will look into all available sources of funding including local, state and federal programs. These programs include but are not limited to the CHOICE Neighborhood Grant, Moving to Work Demonstration, Federal Home Loan Bank (FHLB-AHP), New Jersey Low Income Housing Tax Credits (LIHTC), CDBG, HOME and the Rental Assistance Demonstration (RAD) programs.

Demolition and/or Disposition

Frazier Court II (Campbell Homes Project)

The Trenton Housing Authority received approval from HUD’s Special Application Center (SAC) on July 25, 2014 for the disposition of 2 dwelling buildings containing 30 dwelling units total and 1.09 acres of underlying land at the Prospect Village (AMP), NJ 005000001 called the Campbell Homes project.

Frazier Court II has been vacant since 2003 due to the physical interior condition of the units. The age and condition of the property has rendered it inhabitable.

The THA received a CHAP under the RAD to convert this property to Project Based Rental Assistance and as a result have rescinded the Dispo application to SAC. The THA has received conceptual architectural plans and are in the process of strategizing the financing for this project. The plans for this site consist of a gut rehabilitation and reducing the units to 24 two-bedroom units while increasing the square footage per unit.

Conversion of Public Housing to Project-Based Assistance under RAD

PAGE Homes Rental Assistance Demonstration (RAD)

The Trenton Housing Authority (THA) amended its 2016-2020 5-year and Annual Plan because it was a successful applicant in the Rental Assistance Demonstration (RAD). The THA received HUD approval of its 2016-2020 5-year and Annual Plan on December 15, 2015. The THA, in accordance with HUD’s RAD program, has received an award to convert 77 units at its Page Homes Development to Project Based Rental Assistance. Page Homes is a part of NJ 00500003-Donnelly Homes and currently consists of 159 Public Housing Units. The Page Homes Development closed with HUD in August 2019. Demolition began in September 2019 and construction is scheduled to be completed by December 2020. Leasing has already begun on the
first half of the development that is completed. The development has since been renamed to Turner Pointe.

The THA submitted RAD applications, which will allow the THA to reserve RAD conversion authority for a set of developments. The Prospect Village, Frazier Courts, Lincoln Homes, Wilson Homes and Haverstick Homes developments all received a CHAP award. The THA anticipates applying for RAD for the remainder of public housing units once these conversions are underway.

**Occupancy by Police**

The City of Trenton has an emphasis on public safety. In partnering with the City of Trenton, there may be opportunities of leasing public housing units to police officers for the purpose of increasing security for public housing residents. Occupancy of police officers is needed to increase security for public housing residents.

**Units with Approved Vacancies for Modernization**

The Trenton Housing Authority has approximately 30 vacant units that are targeted for modernization. The THA will modernize and occupy these units in 2021.

**Other Capital Grant Programs**

The Trenton Housing Authority will apply for any capital funding grants that we are eligible for as they become available such as Emergency Safety and Security Grant, Jobs Plus Initiative Grant, Choice Neighborhood Implementation Grant, etc.
ATTACHMENT B

Civil Rights Certification
Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement and by maintaining records reflecting these analyses and actions.

The Housing Authority of the City of Trenton
PHA Name

NJ005
PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official
Clifton Anderson
Signature

Title
Chairman
Date
December 9, 2020
PHA Certifications of Compliance with the PHA Plan and Related Regulations including Required Civil Rights Certifications

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the _X_ 5-Year and/or _X_ Annual PHA Plan for the PHA fiscal year beginning 1/2021, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
   - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
   - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
   - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
   - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
   - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.

14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.

17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).

18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.

19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.

22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

The Housing Authority of the City of Trenton

PHA Name

NJ005

PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2021

5-Year PHA Plan for Fiscal Years 2021 - 2025

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Authorized Official

Title

Signature

Date
ATTACHMENT C

Certification by State or Local officials
Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, W. Reed Gusciora ______________, the Mayor ______________
Official’s Name Official’s Title

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

The Housing Authority of the City of Trenton ______________
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of

Impediments (AI) to Fair Housing Choice of the

City of Trenton ______________
Local Jurisdiction Name

pursuant to 24 CFR Part 91.

The Trenton Housing Authority (THA) Annual Plan is consistent with the City of Trenton’s goals and mission to provide decent, safe and affordable housing for the residents of the City. In addition, THA and the City share a common goal to improve the quality of life for residents of the City of Trenton.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729-3731)

Name of Authorized Official ________________________
W. Reed Gusciora

Title ________________________
Mayor

Signature ________________________

Date ________________________
RAB Board for Annual PHA Plan
On Wednesday, November 4, 2020, senior management of the Trenton Housing Authority met with the Trenton Housing Authority’s Resident Advisory Board (RAB) representing the residents of the Housing Authority. The THA staff gave a presentation on the 2021-2025 5-Year plan & 2021 Annual plan and we advised as to how the Housing Authority approached the planning for the utilization of the anticipated funding. In addition, the various programs and initiatives of the Housing Authority were discussed. The review included an update on the redevelopment of Turner Pointe, Choice Neighborhood Planning grant, Frazier Court II (former Campbell Homes), Family Self-Sufficiency program and attaining a Section 32 Homeownership program.

Upon conclusion of the meeting, the representatives were pleased with the direction of the Housing Authority and offered the following comments:

Would like THA to focus on modernizing the kitchens in the senior / disable buildings. Would like additional camera throughout sites, buildings, and elevators.

In lieu of a Public Meeting, we posted the draft plan on our website and allowed for comments to be emailed or called in. There were no comments related to the annual plan.
BOARD RESOLUTION
RESOLUTION NO. 20-

RESOLUTION OF THE HOUSING AUTHORITY OF THE CITY OF TRENTON (THA) APPROVING AND AUTHORIZING ITS EXECUTIVE DIRECTOR TO SUBMIT THE FIVE-YEAR PLAN FOR FISCAL YEARS (FY) 2021-2025 AND ANNUAL PLAN FOR FY 2021 TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WHEREAS, the Housing Authority of the City of Trenton (THA) is required to submit the Annual Plan in accordance with Section 511 of the Quality Housing and Work Responsibility Act of 1998 (QHWRA); and

WHEREAS, the public hearing was waived by HUD due to the COVID-19 pandemic; and

WHEREAS, the THA has an established Resident Advisory Board (RAB), the membership of which represents the residents assisted by the THA; and

WHEREAS, the THA consulted with the RAB in developing the Plans on November 4, 2020 and considered the recommendations of the RAB in the Plan;

WHEREAS, the Plan is consistent with the Consolidated (Housing) Plan of the City of Trenton; and

WHEREAS, the Plan meets all of the certification requirements of the U.S. Department of Housing and Urban Development:

NOW THEREFORE BE IT RESOLVED, that the Board of Commissioners of the Housing Authority of the City of Trenton approves the Five-Year Plan for Fiscal Years (FY) 2021-2025 and Annual Plan for FY 2021, and authorizes its Executive Director to submit said Plan to the U.S. Department of Housing and Urban Development.

Signed: 
Clifton Anderson  
Chairperson, Board of Commissioners

Date: December 9, 2020

I, Jelani B. Garrett, Secretary to the Board of Commissioners of the Housing Authority of the City of Trenton, hereby certify that at a meeting of the Board of Commissioners held on December 9, 2020, the above resolution was duly approved.

Signed: 
Jelani B. Garrett  
Secretary to the Board of Commissioners

Date: December 9, 2020
RESOLUTION NO. 20 - BACKGROUND

OVERVIEW:

The Five-Year Plan & Annual Plan details the operational goals and objectives for the upcoming fiscal years 2021-2025. The formulation of the goals and objectives was a result of collaborative input from housing authority staff, residents, local government, and other public community agencies.

JUSTIFICATION:

Submission of the Annual Plan is required in accordance with Section 511 of the Quality Housing and Work Responsibility Act of 1998 (QHWRA).

FUNDING SOURCE:

N/A

RECOMMENDATION:

It is recommended that the Board of Commissioners approve the Annual Plan submission.

Attachments:  Resolution No. 20
               Draft Five-Year & Annual Plan

Prepared By:  Chrysti Huff
Violence Against Women Act (VAWA)
Violence Against Women Act (VAWA)

Violence Against Women Act (VAWA) requires PHAs to describe any goals, objectives, policies or programs that enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault or stalking. The THA supports the goals and objectives of VAWA and will comply with its requirements.

- THA Safety Staff will respond immediately to all reports of domestic violence and immediately notify Police, Public Housing Managers and Resident Services of such acts of violence and request appropriate protections and services.

- The THA has completed a full review and revision of its Public Housing Admissions and Continued Occupancy Policy (ACOP) and Public Housing Lease in accordance with PIH-2017-08 notice, Violence Against Women Reauthorization Act of 2013. The THA has amended its lease to include the lease addendum for Violence Against Women and Justice Department Reauthorization Act of 2005. No perspective tenant that is the victim of domestic violence will be denied housing or no tenant will be evicted for same.

- The THA has partnered with Womanspace to provide ongoing training to THA staff. The Womanspace Community Education provides speakers for civic associations, community and faith-based organizations, businesses, schools and others who are interested in understanding interpersonal abuse and violence. By learning more about the issues, community members can become an integral part of the coordinated community response necessary to support victims and hold abusers accountable for their actions.