

# Invisibility of Domestic Violence Among Persons with Disabilities in Human Service Professions

Sheri K. Anderson and Patrick L. Dunn

Domestic violence is recognized as a great social ill in American society, despite efforts by both state and federal governments to address these issues through criminal law and public resources. Victims of domestic violence often feel a lack of empowerment when confronting those who abuse them, and when they do they may face problems in regard to a lack of financial or emotional resources to begin recovery from the abuse. Persons with disabilities who are victims of abuse may often experience even greater negative effects as a result of the functional aspects of their disability, dependence on caretakers, or lack of knowledge or resources of law enforcement or social service agencies to meet their special needs when abuse is reported. This phenomenon is examined through a review of relevant literature, consideration of state and federal legislation intended to address domestic violence and its consequences, and recommendations for future action are discussed.

*Keywords:* abuse, domestic policy, consequences of violence

The development of enlightened humanism in Western civilization and law have led to the creation of principles concerning the dignity of human beings, and modern principles of human rights includes the principles that the dignity of an individual's mind, property, and body be protected to the greatest extent possible. In the United States, the federal Constitution and various state constitutions, as well as codified law and principles of common law, combine to protect these rights and punish those who violate the dignity of others. A discussion of the many ways in which the dignity of individuals is protected across the many facets of individual rights to dignity would necessitate a discussion of the entire breadth and majesty of law and finally to the realization that representative democracy exists to guarantee such rights to individuals and that the structure of law and government of this type exists to guarantee these rights and dignities to all.

One facet in this galaxy of rights and dignities involves the dignity of the individual from harm by others, and most specifically, from those that have a close or familial bond with the individual. Violation of these dignities by persons with close, familial relationships forms the essence of the phenomenon commonly known as domestic violence. The United States Department of Justice, Office on Violence against Women (2015), reports that domestic violence can be

physical, sexual, emotional, economic, or psychological, with specific actions or threats of actions that influence another person. Jones (2000), in her book *Next Time, She'll be Dead: Battering & How to Stop it*, provides an entire chapter dedicated to defining the term domestic violence. She describes domestic violence as "one of those gray phrases, beloved of bureaucracy, designed to give people a way of talking about a topic without seeing what's really going on." (p. 81). Domestic violence is largely viewed as a question of spousal abuse, and stereotypically with husband or male partner as the perpetrator of the violence and the wife or female partner as the victim of the violence. It may be suggested that crime statistics do seem to verify this pattern, and many statutes at the federal and state levels have been instituted to protect women in particular, from domestic or other forms of violence or abuse.

Review of current literature reveals large gaps in research, willingness or ability to report instances of domestic violence, and failure of law enforcement and courts to acknowledge the existence of domestic violence with regard to individuals with disabilities. Among professionals in the fields of either domestic violence or disability/rehabilitation there may be ethical and privacy constraints posing barriers to collecting and documenting data on the topic. Perpetuating lack of voluntary documentation is the inability of pro-

fessional validation of disability and or identification of abuse; i.e., what is "disability," how is it defined, and how would a professional know it when they see it? Hughes, Lund, Gabrielli, Powers, and Curry (2011), reports needing agreement of definitions of both disability and violence that are comprehensive enough to explain what some persons with disabilities experience. It has been observed that textbooks intended for the education of professionals in the field of disability tend not to include data on the prevalence of domestic violence impacting those with disabilities and educational material intended for the domestic violence professional also lacks mention of information concerning disabilities. A lack of information or hard data to describe the phenomenon in this instance could be leading to a lack of awareness, therefore a lack of dissemination of the characteristics of this phenomenon.

Silence of individuals with disabilities themselves concerning domestic violence also confounds the lack of awareness. Depending on the disability, an individual may not understand contextually what has occurred to them, others may not have the communication skills to articulate violence perpetrated, and many may fear further violence, not being believed or loss of services if they report abuse. Finally, physical barriers to locations intended to assist and support those being victimized, such as public transportation to the location, architectural barriers and interpreter services at the location itself, and societal attitudes such as negative views about parents with disabilities, force those experiencing domestic violence to remain in the situation, and validates the statistics of invisibility. If cases of domestic violence are not being reported by those with disabilities, they cannot be documented, reported to legal authorities, investigated or eliminated.

This manuscript attempts to demystify the matter of domestic violence, and in particular, domestic violence concerning individuals with disabilities. Domestic violence in general will be defined and explained from legal and social sciences viewpoints. Resources to assist victims of domestic violence and those victims of domestic violence with disabilities are presented. Finally, the conclusions of the authors are presented concerning the need for additional research on this timely topic.

## Defining Domestic Violence

Research into domestic violence is complicated by the difficulty in operationally defining the term and those involved as both perpetrator and victim. The complexities involved in identifying persons with disabilities, especially in regard to domestic violence, due to the potential ambiguity of the terms are bluntly complicated. Terms such as "household" or "family" often

come to mind when one considers the term "domestic," and refer to individual's literal place of dwelling and others assigned to inhabit it. Such dwellings may be large or small, and may be shared with a family of one person or many people. When viewing a family structure from the historical setting, such as a mother or sibling caring for an adult with a congenital disability, or grandchild caring for a grandparent with an acquired disability, traditional understanding of these terms apply. For others with disabilities not living in such an environment, a dwelling could also include a group home found in a community, and the "family" could encompass the other individuals with disabilities that have been randomly assigned to this group home. Additionally, inhabitants might include personal care attendants, managers of the home. Other examples of dwellings might include assisted living facilities providing meal preparation and daily care by strangers, adult daycare environments with opportunities for individuals to build lasting relationships with those who assist them in daily tasks, and to a lesser degree, institutional settings in which individuals rarely spend time with blood relatives. When definitions expand, such as the family home becoming a group home with family members assigned and reassigned regularly and staff and other overseers paid to fulfill basic life chores, the power differential shifts. This shifting of power, redefining of family and service agencies becoming overseer's causes a fault line of inconsistency and can lead to lack of boundaries. In such a dynamic environment, with many ever-changing participants and understanding of definitions, Lewin (2007) reported that because staff at such facilities may be abusers themselves, often this violence may not be reported.

## Legal Definitions

Many of the federal legal provisions relating specifically to domestic violence came to fruition as a result of the passage of the 1994 Violence Against Women Act (Pub. L. 103-322; codified at 42 U.S.C. §13701-14040). The Act provides definitions of domestic violence and related acts, such as stalking and elder abuse. The federal definition of domestic violence reads

felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction (42 U.S.C. § 13925(a)(8)).

This act provides funding for various grant programs related to domestic violence, but also addresses matters of criminal and civil procedures and penalties concerning domestic violence, including applications towards those accused of such violence and their victims. The Act's criminal penalties included doubling sentencing at the federal level for sex crimes for repeat offenders, and perhaps most importantly, grants full faith and credit to orders of protection (court directives dictating that an abuser avoid contact with the victim), meaning that such an order issued in one state must be given force of law by another state if the victim has relocated there. Rape shield laws were also strengthened, making a victim's sexual behavior virtually inadmissible as evidence against them. Civil law protections speak to the responsibility of the perpetrator providing financial restitution to victims. The Act also attempted to allow victims of domestic violence to sue in federal court on the basis of gender discrimination. The United States Supreme Court, however, barred such suits *United States v. Morrison* (529 U.S. 598 (2000)), citing improper application of the Commerce Clause of the United States Constitution.

Other federal criminal penalties that relate to domestic violence can be found in the United States Code. Some of these provisions restrict possession of a firearm or ammunition by an alleged perpetrator while under an order of protection, or by a convicted abuser after conviction (18 U.S.C. § 922(g)(8-9)). Violence or attempted violence against an intimate partner (18 U.S.C. § 2261), and stalking using the mails or in cyberspace (18 U.S.C. § 2261A), and interstate violation of a protection order (18 U.S.C. § 2262). These crimes can carry penalties of up to life imprisonment in and of themselves depending on the type and severity of the offense. (United States Attorney's Office, North District of Georgia, 2015).

## State Provisions

The federal power to enforce laws concerning domestic violence is largely limited by the Commerce Clause of the United States Constitution to only those crimes that involve the crossing of state lines, such as with violation of orders of protection. However, state law provisions, while varying from jurisdiction to jurisdiction, are typically quite robust in providing criminal penalties for acts of domestic violence, including sex crimes, stalking, and elder abuse. Each state or jurisdiction below the level of the federal government has different, yet similar, laws in regard to domestic violence, with varying penalties for abusers and varying protections for victims.

For example, in the State of Tennessee, domestic violence laws begin with a description of domestic assault (Tenn. Code Ann. 39-13-111). This is defined as assault (described in Tenn. Code Ann. 39-13-101 as in-

tentionally, knowingly, or recklessly causing bodily harm to another, putting the individual in reasonable fear of imminent bodily injury, or physical contact that would reasonably be viewed as extremely provocative or offensive), by persons who are or were married, cohabitating, sexual partners, whether by or against adults or minors. Penalties for such abuse generally involve fines of up to \$200.00 for assault, plus an additional fine of up to \$200.00 as a result of the domestic assault charge, the funds going to domestic violence education, prevention and assistance programs. In addition, the crime is considered a Class A misdemeanor, the most serious category of misdemeanor, with a potential penalty of up to eleven months and twenty-nine days in jail and a \$2,500.00 fine. A final provision of the domestic assault statute provides that convicted abusers must relinquish possession of firearms.

Orders of protection issued by Tennessee courts to alleged abusers carry additional penalties for violators. These violations submit the perpetrator to at least twelve hours in custody and potentially a fifty dollar fine for civil contempt. In addition, violation of an order of protection is a Class A misdemeanor, placing the violator in additional legal jeopardy in addition to other crimes that may have been committed (Tenn. Code Ann. 36-3-601, 624). Other crimes related to domestic violence are recognized by the State of Tennessee, such as stalking (Tenn. Code Ann. 39-17-315). In addition, if an abuser commits additional crimes such as robbery, rape, kidnapping or murder, these can, of course, be criminally pursued and punished in addition to charges specifically related to assault and domestic assault.

Numerous legal protections at both the state and federal level are available to punish domestic abusers and protect victims. The law is not without recognition of the presence and severity of such criminal activity. However, pursuing justice often requires the willingness of victims to report and cooperate with legal authorities. Such a matter is often complicated, especially when victims are dependent upon intrinsic and extrinsic support from their abusers. As this discussion continues, the particular vulnerability of individuals with disabilities to domestic abuse and their feelings of dependence are discussed in relation to the phenomenon of domestic violence.

## Applying Identified Definitions to Persons with Disabilities

Violence prospectively might also be ambiguous when applied to persons with disabilities. Managing anger that arises in a group home setting might be very different when viewed from the perspective of those with disabilities living in confined spaces with strangers. Well-meaning professionals, uneducated about how to assist without restraint might be misconstrued as

helpful instead of perpetrating violence. Hassounah-Phillips, McNeff, Powers, and Curry (2005) and Nosek, Foley, Hughes, and Howland (2001) suggest that disability can tend to increase the potential for victimization through violence.

### Secondary Victimization

Individuals who are abused or victimized by another must live day-to-day, attempting to survive, and when or if they decide to report or acknowledge the abuse, they similarly may face secondary victimization. Further perpetuating secondary victimization for those with disabilities, includes the refusal to acknowledge identified actions as abuse. The unwillingness to identify neglect that leads to harmful outcomes, physical aggression in caring for those with disabilities, and limitation of food or medication as domestic violence, creates a treacherous landscape for understanding, reporting and gaining resolution. Secondary victimization prospectively creates the invisibility of most cases of domestic violence when the victim has a disability. When these individuals do come forward and report abuse or violence perpetrated to them, the attitudinal barriers pose further harm and victimization. It may be suggested that if an individual is considered helpless or child-like, their opinions are not valued and their needs are more easily brushed aside or foreclosed by another. Moreover, if an individual is considered by society as non-sexual, sexual abuse against them may be viewed as trivial or tangential. Finally, if individuals with disabilities are perceived as burdensome, fewer may report victimization out of fear that they will cause more burden to those that they depend on for daily needs. Abuse may potentially become commonplace, or a daily expectation for some persons with disabilities (Copel 2006). It may be suggested that combining the attitude of the victim and society has led to unidentified and misunderstood barriers when seeking solutions to both identified and unidentified abuse.

Domestic violence affects not only the abuse victim, but those close to them, including family, friends, and significant others (United States Department of Justice, Office on Violence Against Women, n.d.). When family members fulfil a caregiver role to an individual with a disability, the family member may feel it is their right to guide or dictate services. It may be proposed that an individual in this situation may find it necessary to allow for individual decisions be made, even if those decisions are harmful or neglectful. Over time, the normalcy or day-to-day routine may cause the individual with a disability to become passive or afraid to advocate for their rights or needs. In a similar situation, frayed tempers, exhaustion of caregivers, and isolation of the individuals with disabilities, may be proposed to lead to violence.

### Public and Private External Resources

Educating individuals about external governmental resources that can intervene, such as law enforcement and human services agencies, represents a daunting task, given the lack of understanding of both domestic violence and its many forms, and the circumstances of individuals with disabilities. Even though the Police Executive Research Forum (2015) reported that successful programs tend to reflect a cooperation between social service providers and law enforcement, there was no confirmation that disability was considered when making this statement. When common practices are considered in the context of persons with disabilities, identified best-practices may not give reach an individual with a disability in need, nor properly document findings to law enforcement responders.

There are several research-based findings that show current policies can actually inhibit effective interaction between law enforcement and domestic violence calls when responding to those with disabilities. First, the Police Executive Research Forum (2015) discusses the use of visible or audible signals such as lights or sirens when responding to a domestic violence call. Individuals with sensory disabilities such as autism may be overwhelmed, frightened or can completely shut down communicatively due to such extreme visual and auditory over-stimulation. This lack of ability to communicate may be perceived by uneducated law enforcement as unwillingness to cooperate or perhaps even a sign of intoxication or emotional instability, leading the interaction and investigation into misguided directions. A second common policy directing officers once on the scene is to separate the parties, according to the Police Executive Research Forum (2015). Establishing space between victims and their perpetrators may help victims speak freely in certain situations, but when disability is a factor, this may create even more challenges. If the perpetrator of the domestic violence situation is the interpreter for a victim who is deaf, for example, and responders do not have proper training in communication with deaf or hard of hearing individuals, barriers are created. If the victim has an intellectual disability, separation from those that typically are perceived in charge, even if that individual is the perpetrator, can prospectively add more fear and victimization to the individual with a disability.

Other policies can cause lasting added burden to the victim with a disability. As outlined by the Police Executive Research Forum (2015), a 72-hour no-contact order can be implemented. Individuals with disabilities rely on limited resources to meet daily needs. If the perpetrator is also fulfilling the role of care-taker, and they are blocked from returning home, needs of the individual with a disability will not be met, further perpetuating the victimization. Without proper

education and understanding by law enforcement that the needs of the individual with a disability will need to be met in another way, a much larger problem can occur. Further perpetuating this type of situation, brought on by well-intended policy, may be proposed to stem from the lack of education that the care-taker will need to possess.

Finally, one method outlined in policy by the Police Executive Research Forum (2015), is to interview neighbors. This seemingly simple way of gathering information can also lead to misinformation and instability in the investigation when documenting the lives of those with disabilities. Well-intentioned onlookers may feel they understand what they view over a fence, or while interacting during walking the dog, but without proper understanding of a disability, or what that disability limits or does not limit, the neighbors have very little actual understanding of what disability truly looks like. An individual with a physical disability may use a van service to get to work each day. The neighbors may report to investigators that the van service is merely taking the individual with a disability to another location. Neighbors may witness abuse, but identify it as helpfulness, such as a spouse never allowing an individual with a disability to leave the house for groceries or other household tasks. While these incidents seem small, as misinformation builds a case, an outcome of findings and reports to the courts may cause a perpetrator to be released without penalty of violence towards another, and as a result the abusive action may fail to be adjudicated by the court (Williams, 1995).

Overall, research by law enforcement, about law enforcement policy and procedure such as that documented by the Police Executive Research Forum (2015), indicates that domestic violence remains hidden, causing it to have less public awareness than other violent crimes. With limited understanding, lack of policy driven initiatives and little or no focus, domestic violence in the lives of those with disabilities constitutes secondary victimization in the realm of law enforcement.

Similar to law enforcement, human service agencies are governmentally funded resources for communities. As with law enforcement, there are policies and procedures that must be obeyed, and these are what organize the resource implementation to groups depending on hierarchy of perceived need. Human services agencies are thought of as primary resources for families in need. Large, general areas of focus can encompass food, shelter, language barriers, employment, transportation, and child and elder services. Statistics reported by Rosen (2006), found poverty rates of approximately 33% and 40% for working women with disabilities and working women with severe disabilities, respectively. These employed women with disabilities are the part of the population that

human service agencies are intended to serve, yet, here again, there is little noted about these areas of focus when it relates to those with disabilities. While interpreter services may be offered in a local department of human services office, and there are working elevators and stable ramps leading into the front door, very little education of employees is documented about the differences in service delivery and needs of those with disabilities.

When reviewing ineffective service delivery to women with disabilities, Chang et al (2003), found that problems with training, funding, and architectural or structural limitations created the greatest problems for persons with disabilities in seeking services. Lack of funding for an agency typically alters policy, so that limited funds can be used for maximum results. With little or no research or statistics kept for those with disabilities seeking services, the population of those with disabilities needing services never makes it to the maximum results list, compiling ineffective services with ineffective service delivery. Agency staff training about disability and how it relates to services continues to add barriers to the lives of individuals with disabilities.

Invisibility of disability affects the ability of human service agencies to lower the impact or incidence of domestic violence, if those being victimized are unable to access those services available from those agencies, whether or not such services are directly related to the matter of domestic violence. Rosen (2006) found that 60% of women of working age with disabilities were either unemployed or under-employed. This group of individuals seeking human services experience barriers in understanding what is expected of them to access services, such as individuals with learning disabilities being unable to complete basic forms to get an appointment or those needing interpreter services to set up the appointment not being able to access the information to gain these services. While the building itself may be up to code with relation to architectural advancements to assist those with physical disabilities when entering the building, the local human services department may be housed in an area that is not on a public bus line, or have outdated parking areas that do not have the space to accommodate wider vans or spacing for side ramps on vans. Each of these individual limitations leads to those with disabilities being unable to access necessary services. In turn, this inability to access basic human services, leads to those with disabilities remaining in situations that can and do lead to domestic violence. Lack of awareness in the community about disability, coupled with the inability of agencies to deal with financial issues of persons with disabilities and the failure of community agencies to provide adequate resources hinder the effect that community agencies have in assisting persons with disabilities who are victims of domestic violence (Hickson, Khemka, Golden, & Chatzistyli, 2013).

## Domestic Violence Organizations

Domestic violence organizations, similar to human services agencies, are prone to the same limitations concerning accessibility and training and staff education about disability and how it impacts the individuals seeking services. One major difference in domestic violence organizations, causing even more challenges for those with disabilities facing domestic violence, is funding. While human services agencies have limited resources, governmental implementation, federal dictate and state match give a more balanced funding stream than funds to nonprofit domestic violence organizations, often sustained through "soft money" sources such as grants and charitable donations. According to Pickert (2013) only about one-fifth of funds allocated to law enforcement were applied to finding transitional housing for victims of abuse. Allocation of these of limited funds for job training, counseling, housing and legal fees incurred by domestic violence organizations confound even the most balanced efforts. With estimates by 85% of women being victimized by abuse during their lifetime (Hassounah-Phillips & Curry, 2002) it becomes understandable that funding allocation can be the greatest barrier to service delivery in domestic violence organizations.

Aside from funding concerns, understanding of the differences faced by those with disability living with domestic violence serves as another barrier to assistance from these organizations. Copel (2006) found that published studies tend to treat disability and abuse as separate issues. Those educated in disability rights, laws or counseling, those that live with disability and disability rights groups have one portion of the puzzle. Those that are educated, study, work in or have been affected by domestic violence have another portion of the puzzle. The inability to combine the two sides into a solid plan for resource delivery may leave individuals with disabilities who face domestic violence invisible in both arenas. Concepts outlined by Copel (2006), such as partners remarks devaluing the woman and addressing her as a disability rather than a person, victims feeling that their disability rendered them physically separate or inferior to other women, thereby giving the perpetrator the power to fail to acknowledge or express remorse that abuse of his partner was wrong, and that the treatment of the woman with disabilities as subhuman, working to further compound the woman's sense of shame, guilt, and confusion, and contributes to her questioning "what she did" to incur the violence. Organizations intended to serve those facing domestic violence may have a limited concept of those living with both disability and domestic violence or the forms of learned helplessness, fear of retribution, or silence that most carry with them.

Because of the vulnerability and highly dependent nature of women with disabilities, they rarely complain or voice anger and humiliation according to Brodwin and Siu, (2007), Women with disabilities reported by

Copel (2006), ignore, rationalize, and endure the abuse for the sake of survival, rather than to preserve their dreams of romantic love. For women with disabilities, Nosek, Howland and Young (1997) reported that husbands or live-in partners were the most common perpetrators of physical and emotional abuse.

Organizations serving those affected by domestic violence do not have the understanding of the components that make up a day in the life of individuals with disabilities. Abuse can be rendered in many facets that, if not taken into consideration, leave gaps in the ability to provide structured services that will allow for consistency in the future success of those victimized. Such examples of disability-related intimate Partner Violence given by Powers et al. (2002) include medication manipulation, refusal to provide assistance with essential activities of daily living, denial of access to telephones and other communication devices, and destruction of adaptive equipment. Withholding of medication and other access to basic needs can be life threatening and used to terrorize the individual with a disability. Damaging or removing expensive adaptive aids can create barriers in communication, mobility and be hard to replace. When these differences aren't taken into consideration as individuals with disabilities meet with domestic violence organizations, comprehensive goals are not met. Current research does not include intake questions that might indicate such abuse is occurring, and individuals themselves in crisis, may not remember or even realize that this form of domestic manipulation is happening or abusive in nature.

A trend in recent years has been to combine all needed services, law enforcement, legal, counseling and other such needs of those facing domestic violence, into family justice centers. As reported by the Police Executive Research Forum (2015, one Maryland county law enforcement agency had over fifty personnel dedicated to domestic violence investigation, adjudication, and assistance. While this may be comprehensive for those facing domestic violence in the general population, resources specific to individuals with disabilities are not specified. Research does not indicate a background in training or education that would give the professionals an understanding of disability. Likewise, when services such as temporary housing shelters are secured, availability of location and needed space are the only considerations. Local public transportation to the shelter, architectural barriers to enter the shelter and access restrooms, showers and other necessities, 24-hour interpreter services, on-site communication devices and informed staff are not secured by such limited funding.

## Disability Organizations

With the major focus of the disability rights movement being equal rights and equal opportunities for individuals with disabilities, most disability-specific organizations center goals and plans around this same philosophy. Those in the disability community have learned from history that organizing groups of like-minded individuals, compiling resources and gathering momentum, creates change. Disability focused organizations are similar in scope to other organizations, maintaining a membership that plans and implements action in a directed way. While organizations intending to research and eliminate disability barriers create positive change for the specified disability group, few such organizations have a disability and domestic violence specific component.

American Disabled for Attendant Programs Today (ADAPT), was founded in 1978 and primarily serves individuals with physical disabilities. The American Council of the Blind (ACB) was founded in 1961 and has been at the forefront of the creation of policies that have shaped the opportunities that are now available to people who are blind. The National Association of the Deaf, founded in 1880, is a civil rights organization of, by and for deaf and hard of hearing individuals. The Arc of the United States, is a national organization serving people with intellectual and developmental disabilities. None of the internet home pages for these organizations included information about individuals in the designated population facing domestic violence. Even with hundreds of dedicated organizations focusing on disability, there is very little attention given to domestic violence and disability. Within the disability world, the invisibility of domestic violence is just as prevalent as in other research findings.

## Conclusions

Research clearly delineates a gap between domestic violence policy and outcomes in regard to the specific needs of individuals facing domestic violence who have a disability. Shifting definitions of disability, and care-taker and community living, make understanding of the specific issues faced by these individuals more difficult. Domestic violence organizations and advocates do not appear, for the most part, to have skills and knowledge of the needs of those living with a disability. When definitions intended as a one-size-fits-all solution is applied to those with disabilities, the outcome is disastrous.

The secondary victimization in the lives of individuals with disabilities facing domestic violence is an unfortunate result of this lack of understanding. When reading books and articles intended to combine the two topics, most focused on chapters dedicated to one or the other,

and no clear combination is accomplished. This lack of a connection allows the reader to make an educated guess at best practices, from knowledge gained from comparing the two sections. Victims with disabilities themselves are unable or unwilling to report such victimization, adding a further secondary victimization component to an already invisible problem faced by communities including those with disabilities. External governmental agencies lack funding, education and training to create a comprehensive crisis response for individuals with disabilities. When attempting to use policy intended for general populations, such as for law enforcement response or completion of documentation at human service agencies, the outcome can be just as detrimental as the situation in need of resource. Even though funding is being utilized for governmental entities, the complex needs and training to meet these needs is not found in the research currently being conducted and those with disabilities are left out. Nonprofit domestic violence centers and disability specific organizations are focused on a dedicated topic. This topic remains the singular direction of any funding or push for policy change, and does not effectively combine domestic violence and disability as a complete issue.

The inability to create a clear picture of domestic violence and the role disability plays in it, with definitions that cross current understanding, fear of retribution by those with disability living in crisis, attitudinal and architectural barriers, emotion and fear, funding constraints, governmental policy that lacks of training and education, have all led to the invisibility of those with disability who face domestic violence. With no clear research and no direction to proceed, it is as though there is a tacit acknowledgement that those with disabilities do not face domestic violence. Until there is acknowledgement of the special needs of victims and the resources and willingness to integrate these special needs into the understanding of phenomenon of domestic violence, victims will continue to find great difficulty in seeking or finding solutions.

## References

- American Council of the Blind. (n.d.). Home page. Retrieved October 13, 2015, from website: <http://acb.org/about>
- American Disabled for Attendant Programs Today. (n.d.). Home page. Retrieved October 13, 2015, from website: <http://www.adapt.org/>
- Brodwin, M. G., & Siu, F. W. (2007). Domestic violence against women who have disabilities: What educators need to know. *Education*, 127(4), 548-551.
- Chang, J. C., Martin, S. L., Moracco, K. E., Dull, L., Scandlin, D., Loucks-Sorrel, M. B., Turner, T., Staroneck, L., Dorian, P. N., & Bou-Saada, L. (2003). Helping women with disabilities and domestic violence: Strategies, limitations, and challenges

- of domestic violence programs and services. *Journal of Women's Health*, 27(7), 699–708.
- Copel, L. (2006). Partner abuse in physically disabled women: a proposed model for understanding intimate partner violence. *Perspectives in Psychiatric Care*, 42(2), 114–129.
- Hassounah-Phillips, D., & Curry, M. A. (2002). Abuse of women with disabilities: State of the science. *Rehabilitation Counseling Bulletin*, 45(2), 96–104, 105.
- Hassounah-Phillips, D., McNeff, E., Powers, L., & Curry, M. A. (2005). Invalidation: A central process underlying maltreatment of women with disabilities. *Women & Health*, 41(1), 33–50.
- Hickson, L., Khemka, I., Golden, H., & Chatzistyli, A. (2013). Views and values of developmental disabilities and domestic violence/sexual assault support professionals regarding the prevention and handling of situations of abuse. *Journal of Policy & Practice in Intellectual Disabilities*, 10(3), 207–214.
- Hughes, R. B., Lund, E. M., Gabrielli, J., Powers, L. E., & Curry, M. A. (2011). Prevalence of interpersonal violence against community-living adults with disabilities: A literature review. *Rehabilitation Psychology*, 56(4), 302–319.
- Jones, A. (2000). *Next time, she'll be dead: Battering & how to stop it*. Boston, MA: Beacon Press.
- Lewin, B. (2007). Who cares about disabled victims of crime? Barriers and facilitators for redress. *Journal of Policy & Practice in Intellectual Disabilities*, 4(3), 170–176.
- National Association of the Deaf. (n.d.). Home page. Retrieved October 13, 2015, from website: <https://nad.org>
- Nosek, M. A., Foley, C. C., Hughes, R. B., & Howland, C. A. (2001). Vulnerabilities for abuse among women with disabilities. *Sexuality and Disability*, 19(3), 177–189.
- Nosek, M. A., Howland, C. A., & Young, M. E. (1997). Abuse of women with disabilities: Policy Implications. *Journal of Disability Policy Studies*, 8(1-2), 157–175.
- Pickert, K. (2013). What's wrong with the Violence Against Women Act? Retrieved November 2, 2015 from <http://nation.time.com/2013/02/27/whats-wrong-with-the-violence-against-women-act/>
- Police Executive Research Forum (2015). Police improve response to domestic violence, But abuse often remains the 'hidden crime'. Police Executive Research Forum Newsletter, 29(1), 1–11.
- Powers, L. E., Curry, M. A., Oschwald, M., Maley, S., Saxton, M., & Eckels, K. (2002). Barriers and strategies in addressing abuse: A survey of disabled women's experiences. *Journal of Rehabilitation*, 68, 4–13.
- Rosen, D. B. (2006). Violence and exploitation against women and girls with disability. *Annals of The New York Academy of Sciences*, 1087(1), 170–177. doi:10.1196/annals.1385.002
- The Arc of the United States. (n.d.). Home page. Retrieved October 13, 2015, from <http://www.thearc.org>
- United States Attorney's Office, North District of Georgia (2015). *Federal domestic violence*. Retrieved June 29, 2016. Website: <https://www.justice.gov/usao-ndga/victim-witness-assistance/federal-domestic-violence>
- The United States Department of Justice, Office on Violence Against Women. (n.d.). What is Domestic Violence? Retrieved October 19, 2015. from [www.justice.gov/ovw/domestic-violence](http://www.justice.gov/ovw/domestic-violence)