



Evaluation Advisory Committee

Meeting Agenda

Meeting Information		
Date: 01/08/18	Location: Seville Plaza (5469 Kearny Villa Road, Suite 3700, San Diego, CA 92123), Dial-in Number: (515) 739-1287, Pin: 902052	
Time: 1:30-3:00 p.m.	Facilitator: Nancy Cannon-O'Connell / Susan Bower Staff: Tamera Kohler, Jegnaw Zeggeye, Mandy Patterson,	
Committee Members: Susan Bower, James Carter, Nancy Cannon-O'Connell, Mary Case, Julie DeDe, Pat Leslie, Michael McConnell, Michael Peddecord, Rob Sideman		
Agenda Items		Presenter
1	Welcome and Introductions	Susan Bower
2	Public Comment	Community Members
3	Consent Agenda: Review and Approval of December Meeting Minutes	Nancy C-O
4	Action Items: a. Review proposed 2018 DV Emergency Transfer Standards	Pat Leslie
5	Discussion Items: a. Design Scorecard for 'Changes to Improve 2018 NOFA' b. Project Monitoring System c. December 2017 RTFH Membership Meeting d. Other	Members Tamera Kohler Tamera Kohler
6	Subcommittee Reports a. Scoring	Nancy C-O
7	Review of Action Items	Susan Bower
Next Meeting		
February 5, 2018, 1:30-3:00 p.m. *Meetings are regularly held on the 1 st Monday of each month from 1:30-3:00 p.m. at Seville Plaza, 5469 Kearny Villa Road, Suite 3700, San Diego, CA 92123.		



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Meeting Minutes

Meeting Information			
Date: 12/04/17	Location: Seville Plaza (5469 Kearny Villa Road, Suite 3700, San Diego, CA 92123) or via conference call.		
Start: 1:30 p.m.	Adjourn: 3:00 p.m.		
Facilitators: Susan Bower, Nancy Cannon-O'Connell	Note Taker: Mandy Patterson		
Voting Members Present: Susan Bower, Nancy Cannon-O'Connell, Mary Case, Julie DeDe, Michael Peddecord Via conf. call: James Carter & Michael McConnell			
Voting Members Absent: James Carter, Pat Leslie, Julie DeDe, Mary Case, Michael Peddecord, Rob Sideman			
Staff Present: Tamera Kohler, Jegnaw Zeggeye Mandy Patterson	Guests Present: N/A		
Agenda Items:			
1	Welcome and Introductions	Nancy Sasaki and Susan Bower	
2	Public Comment	Community Members	
3	Review and Approval of November Meeting Minutes		
4	Discussion Items <ul style="list-style-type: none"> a. Recap of Community Conversation on 2017 NOFA & Scoring b. System Standards Review a. Next steps to ensure annual updates complete c. DV Emergency Transfer Standards 	Nancy C-O Susan Bower DV Members on workgroup	
5	Project Monitoring System – status update	Tamera Kohler, Jegnaw Zeggeye	
6	Subcommittee Reports <ul style="list-style-type: none"> a. Scoring 	Nancy C-O	
7	Review of Action Items	Susan Bower	
Decisions		Motion	Second
1	Approval of November 6, 2017, Meeting Minutes	Susan Bower	Michael Peddecord
New Action Items		Responsible	Due Date
1	Include on the January meeting agenda, an item regarding a scorecard for Changes to Improve 2018 NOFA	Nancy / Mandy	

2	Ensure the community standards and monitoring standards are included on the January Evaluation Meeting agenda and are the focus of the February meeting.	Nancy / Mandy	
3	Add DV Emergency Transfer Plan to the February Membership meeting agenda with Pat Leslie presenting if she is available.	Nancy / Mandy	
4	Add Project Monitoring to the February Membership meeting agenda.	Nancy / Mandy	
Other Notes & Information			
1	The results of the Community Conversation held on 11/9/17 were reviewed. The Committee will consider items for a 'Community Scorecard' to report on changes implemented in 2018.		
2	The Committee heard an update on the Standards work related to DV. Committee members and other volunteers discussed their participation in the DV workgroup convened by Pat Leslie. A draft of the new standards for DV Emergency Transfers will be shared at the January Committee meeting.		
3	Tamera Kohler and Jegnaw Zeggeye provided an update on the status of project management plans.		
4	Community Standards Update Timeline: January – Committee discussion February – Community input meeting March - Review and incorporate changes April – May – Finalize for the June Board meeting June – Board approval		
5	RTFH will produce a project monitoring tool by January 2018 beginning with CoC and ESG projects. Monitoring will begin in March 2018 (March-May with reports back due within 30 days of the monitoring).		
6	The Committee will begin meeting on the first Monday of each month (subsequent to the January 8, 2018 meeting) going forward, with further meetings as necessary.		
7	Subcommittee Report: Scoring Nancy Cannon-O'Connell summarized plans for reconvening the Scoring Committee to prepare for the 2018 NOFA and create a feedback loop with the COC provider partners in the homeless system.		
Next Meeting			
Monday, January 8, 2018, 1:30-3:00 p.m. (Special exception, 2 nd Monday of the month, January only.) *Meetings are regularly held on the 1 st Monday of each month from 1:30-3:00 p.m. at Seville Plaza, 5469 Kearny Villa Road, Suite 3700, San Diego, CA 92123.			

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DOMESTIC VIOLENCE EMERGENCY TRANSFER PLAN

Context

The Regional Task Force on the Homeless, Inc. (RTFH) is concerned about the safety of tenants assisted through the Continuum of Care. In accordance with the Violence Against Women Act (VAWA), housing providers within the CoC allow tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request emergency transfer of assistance between housing units when there is imminent risk of harm.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that the Regional Task Force on the Homeless is in compliance with VAWA.

Purpose

Ensure safety of tenants facing imminent risk of harm.

Policy Statement

Ensure safety of tenants in CoC-supported housing by establishing policy and protocols for transferring housing relocation for tenants who are at imminent risk of harm if they remain in their current housing unit.

Requests for emergency transfer are available regardless of sex, gender identity, or sexual orientation. The ability of provider to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether provider has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

Components of Policy

Definitions

For purposes of this policy, the following definitions apply¹:

¹ Adopted from VAWA Emergency Transfer Plan Sect. 5. 2005; HUD Interim Rule 2012; and RTFH Written Standards 2017.

CoC- supported housing: as described in VAWA 2013², public housing programs, tenant-based, project-based Section 8, housing and rental assistance provided under the Continuum of Care and Emergency Solutions Grants programs, Multi-Family Housing, Housing Opportunities for Persons with AIDS, and HOME.

Covered unit: a unit where rental assistance or subsidy is provided by HUD CoC funding (includes TBRA).

External transfer: emergency relocation of a tenant to another unit here the tenant would be categorized as a new applicant; that is the tenant must undergo an application process in order to reside in the new unit.

Immediate Transfer: transfer of household to another housing location, preferably within 48 hours, which may be extended up to 30 days

Internal transfer: emergency relocation of a tenant to another unit where the tenant may reside in the new unit without having to undergo an application process.

Interjurisdictional transfer: relocation to another CoC geographic area or requiring housing assistance transfer to another housing authority catchment area.

Reasonable belief: standard of awareness in which facts, circumstances, or experiences can be articulated that would result in similar caution by an ordinary person

Safe unit: housing within a designated 'safe house' or location that the victim of domestic violence, dating violence, sexual assault, or stalking believes does not pose imminent risk.

Tenant: any individual or household receiving HUD housing assistance or legally residing in housing from the programs covered by this policy,

Eligibility

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations³ is eligible for an emergency transfer, if: The tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

² 24 CFR Parts 5, 91, 92, 93, 200, 247, 574, 576, 578, 880, 882, 883, 884, 886, 891, 905, 960, 966, 982, and 983

³ as described in 24 CFR part 5, subpart L

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A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

General Qualifications

To qualify for emergency transfer:

The tenant must expressly request the transfer; and

The tenant must reasonably believe there is a threat of imminent harm from further violence if they remain within the same dwelling unit that they are currently occupying; or

In the case of a tenant who is a victim of sexual assault, either they reasonably believe there is a threat of imminent harm from further violence if they remain in the same dwelling unit they are currently occupying, or they experienced sexual assault on the premises during the previous 90-calendar-day period⁴.

Confidentiality

Federal and California State Laws protect victims of violence. State statutes include civil codes, family and welfare and institutions codes, labor and employment codes, and penal codes. In general, disclosure of identifying information, or of the location of residences for domestic violence to unauthorized persons is prohibited by law and subject to serious penalties.

Under HUD regulations, domestic violence programs are restricted from entering personally identifying information about victims into the HMIS system. Data regarding client services pertinent for system performance reporting may be provided using entry into a comparable data base.

All persons assisting with the emergency transfer (including a non-CoC housing provider) will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This specifically includes keeping confidential the new location of the dwelling unit of the tenant from public disclosure or to the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. The Notice of Occupancy Rights under the Violence Against Women Act for all tenants provides more information about the responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

⁴ California Civil code extends this period to 180 days for early termination of lease agreements.

Documentation

Tenant Transfer Request

Requests for emergency transfer are submitted to the housing agency or assistance responsible for housing placement. Requests for transfer will be documented in writing, either by the tenant or the responsible housing agency.

The tenant's submission of a written request to the covered housing provider, where the tenant self-certifies that they meet the criteria in the general qualifications section of this policy, is sufficient documentation to meet the VAWA requirements. The responsible agency will provide reasonable accommodations to this policy for individuals with disabilities, persons needing language translation, and those at immediate risk whose safety may be compromised by a delay in order to complete a written request.

Verification of Risk

A covered housing provider may ask an individual seeking an emergency transfer to document the occurrence of violence that qualifies for implementation of the Emergency Transfer Plan. Documentation may include:

A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under the program.

A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

When the emergency transfer includes early termination of a lease for a unit in the general housing market, additional documentation may be required, such as a copy of temporary restraining order or protective order, copy of a report to law enforcement, or documentation from a qualified third party⁵

Under VAWA, no other documentation is required to initiate the transfer process. Other information may be subsequently needed to facilitate implementation of the transfer.

Reasonable Effort to Seek Alternate Unit

The housing provider and CoC Coordinated Entry System staff will take every reasonable effort to locate alternate safe housing for tenants requesting emergency transfer. Housing comparable to that being vacated and which is acceptable to the tenant is preferred, however, an alternate form of housing that is safe may be offered as an immediate, temporary response. Efforts to identify alternate housing and

⁵ California Civil code identifies qualified third parties such as physicians, psychologist, licensed clinical social workers, or domestic violence or sexual assault counselors.

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client acceptance or refusal of the housing offered will be documented in a tenant record maintained by the agency receiving the request for transfer.

Transparency

The RTFH will provide a copy of this policy available to the housing providers covered by this policy. Providers will make the Emergency Transfer Plan available to tenants upon request. To Information about the ETP, limited to the extent that it protects system safety, will be made publicly available on the RTFHSD website.

System-level Reporting

The RTFH system provider will maintain records of transfers requests, and outcomes of such requests for a period of three years from the initial request, or for a longer period as specified in regulations for the program(s) providing funding or other resources supporting tenant assistance.

When an Emergency Transfer results in moving the tenant(s) to a temporary housing location or institutional setting that is necessary to protect the safety of the client household, the RTFH project performance evaluation process will not penalize the program for a 'non-permanent housing' outcome. Local procedures will adjust program outcome data to neutralize the potential impact of what may otherwise be assessed as a negative outcome. Emergency Transfers that result in successful placement in permanent housing will be credited to the agency initiating the transfer.

Relationship to Other Policies

California Civil Code

California Civil Code (1946.7) allows survivors of domestic violence, sexual assault, human trafficking, stalking, elder abuse, and dependent adult abuse to end their housing leases. This law empowers survivors to leave abusive situations while avoiding the usual penalties associated with breaking a lease. Personnel involved in implementing emergency transfer for tenants of HUD housing assistance will comply with this code.

Case managers and housing navigators will assist HUD- assisted households in early termination of a lease when necessary by (1) advising tenant of their rights and offering written information, such as a copy of the National Housing Law Project brochure⁶ and (2) informing landlords of this Civil code.

Child Welfare Services

In cases where the tenant household is involved with Child Welfare Services (CWS), household must comply with existing court orders. In cases of risk, the parent/Agency can request a modification of existing court orders to allow the children to move out of the county/country with the parent. It is reasonable to expect that process would take, on average, 48 to 72 hours. It might take less time if, for example, all the parties to the dependency case agree and an Emergency Ex Parte Request can be submitted to the juvenile court that same day during business hours. It could, however, take

⁶ Brochures are available in English and Spanish as part of the National Housing Law Project Early Termination Toolkit.

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considerably more time if, for example, the parties do not agree and a contested hearing/trial is required.

The juvenile court may authorize the parent to go to another county with the children on an emergency/temporary visit basis while the court orders about a longer-term move are being addressed. Authorization to leave the U.S. would be problematic since that could affect the juvenile court's jurisdiction and the other parent's ability to obtain custody/visitation rights. The custodial parent would need to ask to modify the court orders (with their attorney and the Agency's assistance) on an emergency basis in the juvenile court.

The ETP will expect that CWS-involved households may need interim temporary safety arrangements within the CoC (San Diego County) for at least 48-72 hours but up to 60 days while the matter is being addressed in juvenile court.

Coordinated Entry System (CES)

The RTFH will provide a coordinated system to assure secure emergency transfers. The system will comply with federal and state mandates for protection of victims of violence. Coordination by the RTFH will work with the existing safe shelter system to enhance the capacity of the CoC to respond to the needs of victims of violence. The system design will ensure confidentiality of identifying personal information in accordance with federal and state law, and health-related information protected by the Health Insurance Portability and Accountability Act (HIPAA).

Prioritization and Housing Waiting Lists

Emergency transfer requests are initiated in response to physical harm, as such, this policy takes lethality into consideration. Priority is given in transfer to an available comparable housing resource. For example, priority is given when a transfer from an occupied unit or bed can be made available in exchange for the unit or bed the ETP client will occupy. Retaining tenant safety for all persons immediately impacted by the exchange will be given consideration in prioritizing the use of resources.

Waiting list priority will be given only to the extent necessary to facilitate transfer between housing units of the same housing type and to the extent that it does not violate Fair Housing regulations. This type of transfer results in creating a vacancy that can be made available to the first qualifying person or household on the waiting list. As a result, the order of the waiting list is preserved.

Office of the Public Defender / Law Enforcement

Some cases of violence may require involvement of the Office of the Public Defender or other law enforcement agencies such as the Drug Enforcement Agency. In these cases, the responsible housing agency will assist the tenant in connecting with these external organizations. Information about the case continues to be governed by the terms and conditions described under confidentiality.

Termination of Assistance

Reasons for Termination of Assistance or Eviction from Occupancy

Under the ETP, the conditions for termination of housing assistance or eviction from occupancy remain consistent with existing policies for any recipient, such as failure to pay rent. These policies consider the safety of tenants but do not permit the removal of assistance based on the mere fact of being a victim of violence.

Determination of Household Assistance

When households separate as the result of violence, members of the household identified as victims of violence are offered assistance under the ETP policy. When circumstances include mutual combatants, where both parties may be considered victims, housing for each of the victims is offered in accordance with the ETP policies. In cases where one component of the separated household needs to establish eligibility, VAWA cites that a period of 90 days to establish eligibility for a program or find new housing is generally reasonable.

Limitations and Disclaimers

Nothing in this policy may be construed to supersede any eligibility or other occupancy requirements that may apply under a covered housing program.

Housing provider is not liable for protection of tenants (damages, injury, harm) resulting from tenant refusal of safe housing; or from actions of individuals not under the direct control of the provider. The responsibilities of agency and housing provider personnel do not extend beyond the ordinary protections of clients as mandated by law. (i.e. no liability beyond that of an ordinary citizen is assumed as the result of providing assistance to the household.)

Plan Implementation Protocols

Implementation of the RTFH Emergency Transfer Plan (ETP) has the following features:

Request for Transfer

Request for emergency transfer will be initiated by the tenant through contact with the agency case manager or housing provider who placed the tenant into housing.

Requests will be documented in writing by the staff receiving the request or written request from the tenant. Documentation will contain only information critical to facilitate safe transfer; use of a standardized form is preferred but not required as long as documentation includes the information that would be included on the form.

Assessment

Staff receiving the request will conduct a brief assessment to determine the type of transfer required (internal, external, inter-jurisdictional) and the urgency of transfer to ensure safety. Assessment may

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include review of the safety screening performed prior to placement in housing, or in cases where an immediate transfer is required, may be completed after moving the tenant to a safe setting that is temporary.

Use of the Campbell's Danger Assessment⁷ is the preferred risk and lethality assessment instrument, however, it is not required to initiate an immediate move to a safe setting. Experts caution that the risk assessment should be used shelter and service response programs and it should not be used by law enforcement or court systems⁸. This assessment is protected by confidentiality in the records of a shelter or advocacy program and is protected by federal and state statutes that give specific confidentiality protections to domestic violence victims. Release of the risk-assessment instrument without explicit written release has dangerous implications for the victim and is prohibited by this policy.

Communication

To help maintain confidentiality, a secured distribution list and non-electronic communication are the preferred methods for arranging safe housing. Any electronic communications will include a statement of confidentiality advising all unintended recipients of their responsibilities to immediately delete the communication, to retain confidentiality, and to advise the sender.

Key Features in Implementation

Immediate internal transfer: Safety of the tenant is paramount in the implementation of the ETP. Immediate transfer (within 48 hours) upon availability of safe unit and verification of eligibility is anticipated.

Trauma-informed care: Trauma informed care implies a framework that involves understanding, recognizing, and responding to the effects of all types of trauma, including violence and the threat of violence. Trauma-informed *care* means treating a whole person, taking into account past *trauma* and the resulting coping mechanisms when attempting to understand behaviors and treat the patient.⁹ The RTFH expects ETP providers to engage with ETP applicants in keeping with the principles of trauma-informed care.

Client Choice: If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit.

Preferred housing providers: Memoranda of Understanding (MOUs) with other housing providers can help facilitate rapid transfer. Housing providers are encouraged to develop MOUs

⁷ Campbell, J.C. (1995). Assessing dangerousness. Danger Assessment Newbury Park, CA: Sage

⁸ Journal of Interpersonal Violence 2009, published online 30 July 2008, State of Louisiana summary.

⁹ Compiled from the www.thenationalcouncil.org; [psychology today](#); and the [Alameda County CoC website](#).

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Outreach and Support: To assist tenants in accessing support services, the RTFH will provide information about CoC programs serving victims of violence and the 2-1-1 referral system.

Pending processing of an emergency transfer and the actual transfer, tenants will be urged to take all reasonable precautions to be safe. VAWA suggests that tenants who are victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1– 800–799–7233, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1– 800–787–3224 (TTY). Additionally, tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network’s National Sexual Assault Hotline at 800–656–HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>. Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime’s Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.¹⁰

Personnel Facilitating Emergency Transfers

Personnel responsible for implementation of the ETP should evidence appropriate knowledge of the existing safety-first network of providers of victim services, lethality assessment, and have completed State Domestic Violence Certification training. As a component of the ETP, the RTFH will identify or develop a Domestic Violence High-Risk Response Team comprised of individuals possessing these qualifications.

Time limits

There are regulatory guidelines related to the incidence of a qualifying event. To initiate the ETP an incident or threat of violence must have occurred within past 90 days or within the past 180 days for early lease termination.

The RTFH housing provider cannot guarantee how long it will take to process a transfer request. The provider will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit, preferably within 48 hours.

Unit availability

If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant is being transferred. If no safe units area available for which a tenant who needs an emergency is eligible, HP will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant’s request, RTFH will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

¹⁰ VAWA, 2016 update, section

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If a safe unit not available, the tenant may request emergency transfers within the same housing provider must receive, at a minimum, additional priority that housing providers may already provide to other types of emergency transfer requests.

The tenant may request external emergency transfers concurrently with internal transfers if a safe unit is not immediately available. RTFH may be unable to provide immediate transfer to a particular program or unit if the tenant has not established or cannot establish eligibility for that unit.

Tenant transfer to a temporary safe housing location may be necessary for safety. In these instances, transfer may involve movement between housing types (such as moving from a permanent, or market place unit to an emergency safe house or sponsor-based facility). Immediate placement with a known hotel-motel provider will be used as a last resort and will be limited only to the time necessary to locate a more secure setting.

ATTACHMENTS

Emergency Transfer Plan Checklist per VAWA 2016

Section 5.2005

(1) For purposes of this section, the following definitions apply:		
(i) <i>Internal emergency transfer</i> refers to an emergency relocation of a tenant to another unit where the tenant would not be categorized as a new applicant; that is, the tenant may reside in the new unit without having to undergo an application process.	Y/N	
(ii) <i>External emergency transfer</i> refers to an emergency relocation of a tenant to another unit here the tenant would be categorized as a new applicant; that is the tenant must undergo an application process in order to reside in the new unit.	Y/N	
(iii) <i>Safe unit</i> refers to a unit that the victim of domestic violence, dating violence, sexual assault, or stalking believes is safe.	Y/N	
(2) The emergency transfer plan must provide that a tenant receiving rental assistance through, or residing in a unit subsidized under, a covered housing program who is a victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer if:		
(i) The tenant expressly requests the transfer; and	Y/N	
(ii)(A) The tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying; or	Y/N	
(B) In the case of a tenant who is a victim of sexual assault, either the tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying, or the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for transfer.	Y/N	
(3) The emergency transfer plan must detail the measure of any priority given to tenants who qualify for an emergency transfer under VAWA in relation to other categories of tenants seeking transfers and individuals seeking placement on waiting lists.	Y/N	
(4) The emergency transfer plan must incorporate strict confidentiality measures to ensure that the covered housing provider does not disclose the location of the dwelling unit of the tenant to a person who committed or threatened to commit an act of domestic violence, dating violence, sexual assault, or stalking against the tenant.	Y/N	

(5) The emergency transfer plan must allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available.	Y/N	
(6) The emergency transfer plan must describe policies for assisting a tenant in making an internal emergency transfer under VAWA when a safe unit is not immediately available, and these policies must ensure that requests for internal emergency transfers under VAWA receive, at a minimum, any applicable additional priority that housing providers may already provide to other types of emergency transfer requests.	Y/N	
(7) The emergency transfer plan must describe reasonable efforts the covered housing provider will take to assist a tenant who wishes to make an external emergency transfer when a safe unit is not immediately available. The plan must include policies for assisting a tenant who is seeking an external emergency transfer under VAWA out of the covered housing provider's program or project, and a tenant who is seeking an external emergency transfer under VAWA into the covered housing provider's program or project. These policies may include:		
(i) Arrangements, including memoranda of understanding, with other covered housing providers to facilitate moves; and	Y/N	
(ii) Outreach activities to organizations that assist or provide resources to victims of domestic violence, dating violence, sexual assault, or stalking.	Y/N	
(8) Nothing may preclude a tenant from seeking an internal emergency transfer and an external emergency transfer concurrently if a safe unit is not immediately available.	Y/N	
(9) Where applicable, the emergency transfer plan must describe policies for a tenant who has tenant-based rental assistance and who meets the requirements of paragraph (e)(2) of this section to move quickly with that assistance.	Y/N	
(10) The emergency transfer plan may require documentation from a tenant seeking an emergency transfer, provided that:		
(i) The tenant's submission of a written request to the covered housing provider, where the tenant certifies that they meet the criteria in paragraph (e)(2)(ii) of this section, shall be sufficient documentation of the requirements in paragraph (e)(2) of this section;	Y/N	
(ii) The covered housing provider may, at its discretion, ask an individual seeking an emergency transfer to document the occurrence of domestic violence, dating violence, sexual assault, or stalking, in accordance with § 5.2007, for which the individual is seeking the emergency transfer, if the individual has not already provided documentation of that occurrence; and	Y/N	

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(iii) No other documentation is required to qualify the tenant for an emergency transfer.	Y/N	
(11) The covered housing provider must make its emergency transfer plan available upon request and, when feasible, must make its plan publicly available.	Y/N	
(12) The covered housing provider must keep a record of all emergency transfers requested under its emergency transfer plan, and the outcomes of such requests, and retain these records for a period of three years, or for a period of time as specified in program regulations. Requests and outcomes of such requests must be reported to HUD annually.	Y/N	
(13) Nothing in this paragraph (e) may be construed to supersede any eligibility or other occupancy requirements that may apply under a covered housing program.	Y/N	

ATTACHMENT

Training and Support Features of the Emergency Transfer Plan

Optimal implementation of the RTFH Emergency Transfer Plan (RTP) rests on the ability to provide immediate response by personnel with a working knowledge of the local emergency shelter and housing systems, the needs of victims of violence, and laws applicable to protecting victims. The system includes resources beyond those funded by the U.S. Department of Housing and Urban Development (HUD) for homeless assistance.

Personnel implementing the RTFH ETP should evidence appropriate knowledge of the existing safety-first network of providers of victim services, lethality assessment, and have completed State Domestic Violence Certification training. As a component of the ETP, the RTFH will identify or develop a Domestic Violence High-Risk Response Team comprised of individuals possessing these qualifications. This team will offer periodic training at the request of the RTFH.

Provision of a safe environment for victims of violence should be augmented by services that work to overcome the trauma associated with violence and ensure the tenant sense of safety. A myriad of services, such as legal assistance, personal or family counseling, education and advocacy concerning fair housing, transportation, or access to medical and mental health care may be needed. The RTFH ETP will include access to information about services available to victims of violence.

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ATTACHMENT

Sample Certification and Verification Form

This form is completed by or on behalf of the victim of violence requesting an emergency transfer.

Date of request _____ Date Received by Authorized Provider _____

Name of victim: _____

Name of person completing form: _____

Names of family member or other persons on lease:

Names of additional persons residing in current housing unit: _____

Current residence of victim: _____

Name of Alleged Perpetrator (if known and safe to disclose): _____

Relationship of Alleged Perpetrator to Victim: _____

Date(s) and time(s) of incidence: _____

Brief Description of Incidents (attach pages if necessary): _____

Is this request the result of sexual assault on the premises within the past 90 days? ___Yes ___No

Describe why the victim believes they are at imminent harm if they remain in the current housing:

Names of third- party having knowledge of incidents (if any):

Certification: I certify that the information provided on this form is true and correct to the best of my knowledge and recollection and that the person(s) identified is / are or have been victim(s) of domestic violence, dating violence, sexual assault, stalking, or human trafficking. I acknowledge that submission of false information may jeopardize program eligibility and could be the basis of denial of assistance, revocation or termination of assistance, or eviction.

Date: _____