



## **Lake County Continuum of Care Domestic Violence Policies**

The LCCoC ensures that survivors of domestic violence are able to access any homeless program that is able to ensure participant safety and is appropriate to their needs; no individual or family is denied access to any homeless program due to experiences as a survivor of domestic violence.

**Emergency Transfer Process** Participants may submit an emergency transfer request directly to program staff. The program must communicate with the Coordination Entry Operator to inform them that an emergency transfer request has been made and whether the request is for an internal transfer (a transfer where the client would not be categorized as a new applicant), external transfer, or both. Participants may seek an internal and external emergency transfer at the same time if a safe unit is not immediately available. If the participant receives tenant-based rental assistance, the program will take reasonable steps to support the participant in securing a new safe unit as soon as possible and a transfer may not be necessary.

**Emergency Transfer Confidentiality Measures** Programs will ensure strict confidentiality measures are in place to prevent disclosure of the location of the client's new unit to a person who committed or threatened to commit an act of domestic violence, dating violence, sexual assault, or stalking against the client. Any information provided by a client when requesting an emergency transfer, including the fact that domestic violence occurred, must be kept in strict confidence by the program. No employees or contractors may have access to confidential information unless explicitly authorized by law. The information must not be entered into any shared database or disclosed to anyone unless the disclosure is:

1. Requested or consented to in writing by the individual in a time-limited release;
2. Required for use in an eviction proceeding or hearing regarding termination of assistance; or
3. Otherwise required by applicable law.

The landlord does not have a right to know the details related to the emergency transfer either.

All efforts are made to protect the privacy and safety of survivors of domestic violence, dating violence, sexual assault, stalking, and human trafficking.

**Family Separation** Where a family receiving tenant-based rental assistance separates as part of the emergency transfer, the family member(s) receiving the emergency transfer will retain the rental assistance when possible. The program will work with the CoC and the household to support an effective transfer in situations where the program is not a good fit for the family member(s) receiving the emergency transfer.

**Coordinated Entry Immediate trauma-informed, warm handoff through emergency situations, in accordance with the Emergency Transfer Plan and Lake County Continuum of Care Coordinated Entry Policy, highly recommends that all CoC partners refer immediately to LFRC or Scott's Valley.**

It is important for providers to consider the options for survivors seeking an emergency transfer plan using a trauma-informed and person-centered approach and avoid creating trauma for participants. All staff must be trained in conducting trauma-informed assessments of participants.



The LCCoC provides Trauma Informed Care training annually. Special consideration and application of trauma-informed techniques are afforded to survivors of domestic violence or sexual assault to help reduce the chance of re-traumatization.

To ensure the safety and address other needs of survivors of domestic violence, all assessment staff must be trained to both provide appropriate safety planning for survivors of domestic violence through the assessment process and to conduct a trauma-informed assessment of participants. Special consideration and application of trauma-informed assessment techniques are afforded to survivors of domestic violence or sexual assault to help reduce the chance of re-traumatization.

Safety protocols and protections to those fleeing a domestic or dating violence situation will be afforded the ability to enroll and be further prioritized within the Coordinated Entry System after being safely accommodated. Clients presenting for service, currently fleeing a domestic or dating violence situation, shall not be mandated to enroll in the CoC's Coordinated Entry process, however, they may at their request.

If the household rejects referrals to the victim service provider (VSP) but elects to be enrolled in the CES, they must either:

- Complete the Coordinated Entry System full assessment process at that Access Point, ensuring confidentiality and de-identification standards are followed' or,
- Arrange with another point of certified entry to complete the assessment within 48 hours of contact with the initial Access Point

Households presenting to an Access Point and who elect to enroll in the Coordinated Entry System will have the option to have their personally protected identifiers withheld from the Lake County HMIS as follows:

- First, Middle, Last Name entered as Unknown First 1, Unknown Last 1 (middle name null)
- Date of Birth, Race, Ethnicity, Veteran Status – Client Refused
- Lake County City or other local questions may be null
- Client Contacts – no completion
- Client Housing Documentation – no completion within the HMIS, but must be collected by the housing project provider if the client becomes enrolled in a CoC project

A client's full name along with other PPI from the Assessment may be transmitted for use by the CES Operator for prioritization by uploading the hard copy assessment to a secure Lake County Behavioral Health ShareFile folder.

### **Emergency Transfer Requests coming from Permanent Housing Projects**

Specific emergency assistance/transfer protocols for clients served within the CoC are also identified in each Program Standards document for Street Outreach, Emergency Shelter, Transitional Housing, Rapid Re-Housing, and Other Permanent Housing that adhere to the overall CoC Emergency and Safety policies.

The role of the Coordinated Entry Operator regarding emergency service protocols will be to assist in the rapid identification of suitable safe housing options or, if available, emergency transfer to suitable permanent housing projects. The CES Operator will remain aware of clients



on the Inactive category of the By-Name List who may need to change their list status due to an emergency event. The Operator shall also ensure they are able to identify Households on the By-Name List who request their personally protected information be anonymized but will be the first level prioritized suitable housing matches dependent on availability.

The CoC CES will work closely with the network of participating and non-participating victim services providers (VSPs) to act as quickly as possible to move a household with tenancy and who is a DV survivor to another confidential unit, however, the CoC cannot guarantee either that a transfer request will be approved or how long it might take to process a transfer request. Information regarding emergency service connections and/or non-unit transfers will not be recorded in the HMIS and the Lake CoC will hold confidential information regarding either tenants or Access Point clients requesting emergency services or transfers. Tenants may give their program provider written permission to release transfer information on a time-limited basis, or as disclosure of the information may be required by law for use in an eviction proceeding or hearing regarding termination from the Covered Program.

Confidentiality regarding emergency situations (on behalf of the CES, housing providers, and the Household being transferred), should include disclosures of any new location of the tenant's unit or details about moving dates, associated household members, or other highly sensitive information that might impact the Household's overall safety.

Transferred tenants, regardless of the presenting safety conditions, must agree to abide by the terms and conditions that govern occupancy in a new unit to which the tenant may be transferred. Emergency Transfer contact information for various emergency service providers is contained within the HMIS on the program attributes form and all external records of emergency transfers must be retained by the provider who made the request or five years from the date of the transfer request.

**VAWA-Required Forms and Notices** The Violence Against Women Act (VAWA) mandates that recipients of HUD funding provide each household applying for assistance with a Notice of Occupancy Rights and Certification Form at each of the following times:

1. The household is denied assistance;
2. The household is admitted to the program;
3. The household receives notification of eviction; and/or
4. The household is notified of the termination of assistance.

The CoC encourages all agencies to provide these documents to their clients.

The Notice of Occupancy Rights must be made available in multiple languages according to program clientele's preferred language(s), and include:

1. VAWA protections, including survivor rights of confidentiality and the prohibited bases for denial or termination of assistance or eviction; and
2. Limitations of VAWA protections, including a housing provider's compliance with court orders and right to evict or terminate assistance to tenants for any violation not premised on an act of domestic violence, dating violence, sexual assault, or stalking.