

Transitional Housing Policies development and approval process

Each Grants to Indian Tribal Governments Program (Tribal Governments Program) grantee who has been approved to use grant funds to provide transitional housing or living expenses to victims of domestic violence, dating violence, sexual assault, and stalking is **required to prepare a submit a written transitional housing assistance policy before using any grant funds for this purpose**. Grantees are free to craft their own policies so long as the policy addresses each of the requirements specified in the [transitional housing assistance special conditions attached to your grant award](#).

As a new grantee, you are required to have your final policies, procedures, and rules governing the provision of the transitional housing and related supportive services approved by OVW within 60 days following the New Grantee Orientation.

► **You do not have to wait for the New Grantee Orientation to get started.**

A copy of a transitional housing assistance policy template is attached to this document to assist you with your policy development. Grantees may use this document as a guide in preparing your own transitional housing assistance policy.

The purpose of this document is to highlight other factors that grantees may want to consider when developing their policies. The following information will provide you with guidance on how to develop your policies and the steps to take to get them reviewed and approved.

Tribal Transitional Housing Philosophy

- ✓ **Support services for your transitional housing program must be provided on a voluntary basis.**
- ✓ **Program should practice survivor-centered approaches in its services.**
- ✓ **Confidentiality is Key.**
- ✓ **Collaborations and partnerships are critical to enhancing the transitional housing program's capacity of offer the full range of services survivors may need.**

Program description

Describe the support services you are providing transitional housing participants.

- Include your approach to supporting survivors in accessing transitional housing and long-term permanent housing.
- Include your economic advocacy approach and how it will work to support survivors' movement toward economic self-sustainability.
- Describe the kinds of activities your program will offer to survivors (and their children) to assist them in their process of recovering from the impacts of violence.
- Describe your culturally specific approach to working with survivors to promote a survivor-centered approach to providing your transitional housing

Duration of assistance must be reasonable.

The minimum length of the program must be 6 months and can be up to a maximum of 24 months. Experience recognizes that the longer a participant has the benefit of the program, the greater impact the program may have.

Consider:

- Other similar resources available to victim.
- Total budget for transitional assistance.
- Victim's own resources/income.

Eligibility criteria

Eligibility Criteria

A survivor of domestic and/or sexual violence, dating violence, or stalking:

- In need of housing as a result of domestic violence and/or sexual violence, dating violence, or stalking.
- Eighteen years of older or (legally) emancipated minor.
- Willing to meet with staff on mutually-determined schedule for check in meetings.
- Willing to create an individualized safety plan, with the assistance of the Tribal Transitional Housing staff.

Program Eligibility

- Minimally the OVW criteria.
- Programs can add additional criteria. However, eligibility that decreases accessibility is discouraged.
- Consider your program's mission and intent.
- Consider your community's needs.

Accepting Victim's Statement as Proof of Status

- Should be written by victim (if possible), signed and dated
- Should include date(s) of incidents
- Should describe victim's injuries and fear
- Should describe the impact that the violence has had on the victim/victim's children

Accounting records

Maintaining Confidential Accounting Records

File for each transaction should include documentation related to:

- The original request for assistance
- Processing (review/approval)
- Modifications to the original request
- Supporting documentation related to victim eligibility for receipt of assistance

Record Security Procedures

- Keep files with confidential information in secure area that is segregated from all other files
- Files should be kept in locked file cabinet
- There should be clear, written guidance, specifying who has the authority to physically access the files
- Grantee should develop/maintain sign-out log to track who has accessed the files and for what purpose

Recording Transactions

- Assign numeric identity code that corresponds with victim's name and date of birth.
- Record date, type and amount of assistance provided to the victim.
- Create written policy specifying who has access to the confidential transaction log.

Post- Disbursement Documentation

The grantee is responsible for maintaining proper documentation of how grant funds were used. It is suggested that grantees consider maintaining the following documentation:

- Rental or Utility Assistance: Proof of payment to landlord or utility provider
- Childcare Assistance: Proof of payment to provider

- Re-location Assistance: Receipts from carrier, moving company, etc.
- Security: Receipts for purchase of equipment and from locksmith, etc.
- Educational Assistance: Receipts from educational institution or organization.

Financial Management of Transitional Assistance Funds

- Maintain clear lines of authority for all individuals involved with requesting, approving, and processing transactions
- Use a written policy that specifies who has the authority to approve transactions
- Divide authority to request, approve, and process transactions among different individuals
- Use written procedures for recording transactions
- Use written procedures that provide for regular financial reconciliation of records
- Develop policies that ensure that access to financial records, gift cards, tokens, request forms, etc. is controlled

Policy template

Review the **policy template** attached to this document. It is also available on Red Wind’s website. The template can help you understand the different areas to focus on in the development of your policies and procedures. The template can be downloaded at <http://www.red-wind.net/programs/techassist/TransitionalHousing/>

Policy review with your OVW Technical Assistance Provider, Red Wind Consulting, Inc.

In order to facilitate the approval of your policies, it is suggested you work with the OVW Tribal Transitional Housing Technical Assistance Provider, Red Wind Consulting, Inc., to streamline the review and approval process:

- Contact Red Wind to answer any questions you might have regarding the scope of policies and procedures you need.
 - a. Red Wind can schedule time to talk with you on the phone at the onset of your policy development and each step along the way.*
- Submit a final draft of your policies and procedures to Red Wind for review to refine your draft prior to submission to OVW.**
- Red Wind will provide you with written recommendations for revisions, edits and/or changes if needed.

OVW approval

Once you have finalized your policies after review by Red Wind, to include making revisions to your policies from Red Wind's review:

- ▶ **Submit revised policies to Red Wind for final review.**
- ▶ **Red Wind will inform you via email to submit the policies to your OVW Grant Specialist via GAN.**
- ▶ **Submit a copy of the email you received from Red Wind, the Policy Review Form, and final policies and procedures for OVW review and approval.**

Contact information for your Tribal Transitional Housing Technical Assistance Provider

Red Wind Consulting, Inc.

W. www.red-wind.net

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Transitional Housing Policy Template

Developed by Red Wind Consulting, Inc.

This template is being provided to help you develop your transitional housing policies if you chose to use it in whole or in part. Items in *ITALICS* are areas you should fill in/describe specifically for your program.

Red Wind Tribal Technical Assistance can assist you in the policy development process, through conference calls, review and feedback on your policies to help ensure they are strong, effective and do no harm to victims. Contact Red Wind at info@red-wind.net to arrange a time to talk about your policy needs.

>>INSERT PROGRAM NAME>> Transitional Housing Policy

1. Scope of Services

The >>INSERT PROGRAM NAME>> has a program mission to >>INSERT GUIDING MISSION, VISION, VALUES>>

The >>INSERT PROGRAM NAME>> Transitional Housing capacity is limited to serving >>INSERT NUMBERS TO BE SERVED ANNUALLY>> individuals/households per year to ensure adequate time and focus for the >>INSERT PROGRAM NAME>> Housing Advocate to work closely with program participants to address their needs. >>INSERT PROGRAM NAME>> Transitional Housing participants can stay in the program for >>DEFINE YOUR PROGRAM LENGTH, minimum of 6 months up to a maximum of 24 months>>.

All services in the program are voluntary. >>INSERT PROGRAM NAME>> will encourage participants to utilize the options made available to them to reap the full benefit of the program, however, there are no consequences for a participant declining any aspect of the program.

The >>INSERT PROGRAM NAME>> recognizes that some participants may have needs that exceed the scope of the assistance outlined above or may require more than 24 months of assistance. >>INSERT PROGRAM NAME>> will consult with its assigned Program Specialist at the Office on Violence Against Women before offering assistance to a participant that exceeds the scope of allowable assistance.

>>INSERT PROGRAM NAME>> will use a portion of its funds that it received from its Office of Violence Against Women (OVW) Grants to Tribal Governments Program award to provide Transitional Housing exclusively to adult victims of domestic violence (intimate

partner), dating violence, sexual assault, or stalking. The >>INSERT PROGRAM NAME>> is strictly a transitional housing program and not an emergency shelter response.

The >>INSERT PROGRAM NAME>> offers the following program components: >>DESCRIBE EACH ASPECT OF YOUR PROGRAM, some suggested program areas include safety planning, recovery from violence, housing advocacy and economic advocacy>>

>>INSERT PROGRAM NAME>> will employ the following practices to ensure that the funds are used only to assist eligible victim participants, and will do so in ways that do not compromise victim safety.

2. Eligibility for Services

The >>INSERT PROGRAM NAME>> will serve persons who self-identify as a victim of domestic violence, sexual violence, dating violence, and stalking. The individual or head of household must be 18 years old or older or legally emancipated. The victim must be able to live independently, without access to staff or support 24-hours per day, 7 days per week. Direct services for children is not being provided to children, including children who witness domestic violence or victims of child abuse, except where the child(ren) meet the program eligibility for >>INSERT PROGRAM NAME>> Transitional Housing services or where such services are an ancillary part of providing transitional housing services to the child's parent (or legal guardian) who is a victim of domestic violence, sexual violence, dating violence of stalking.

Victims eligible to be served by the >>INSERT PROGRAM NAME>> Transitional Housing are survivors: (1) who are homeless, or in need of transitional housing assistance, as a result of a situation of domestic violence, sexual violence, dating violence, or stalking; and (2) for whom emergency shelter services or other crisis intervention services are unavailable or insufficient.

Victims must have recently fled/be fleeing domestic abuse, sexual violence, dating violence, or stalking without sufficient emergency or transitional housing available.

The >>INSERT PROGRAM NAME>> target population is >>DEFINE YOUR TARGET POPULATIONS>>. If your program chooses to serve people outside of tribal membership, the provide the following: The >>INSERT PROGRAM NAME>> will not discriminate based on race, class, gender identity, religion, national origin, or familial status.

2.a Waiting List

>>INSERT PROGRAM NAME>> will maintain a waiting list for available space in the program. Applicants will be asked to >>DESCRIBE HOW YOU WILL MANAGE YOUR WAITING

LIST>>.

Participating households include >>DESCRIBE HOW YOU DEFINE HOUSEHOLD>>.

2.b Provision of Services

The >>INSERT PROGRAM NAME>> will take steps to ensure that funds are used in accordance with the OVW Grants guidelines. The >>INSERT PROGRAM NAME>> Transitional Housing will **NOT**:

1. Provide >>INSERT PROGRAM NAME>> to individuals/families who are **not** adult victims of domestic violence, dating violence, sexual assault, and stalking;
2. Impose sanctions against victims of domestic violence, dating violence, sexual assault, and stalking;
 - a. Participants will not be expected to participate in support group, therapy, or other services to receive Transitional Housing.
 - b. Participants will **not** be penalized for choosing not to file criminal or civil charges against their abusers or for choosing **not** to participate in any aspect of the criminal justice system.
 - c. Any mental health services offered are voluntary and **not** a condition for receiving services.
3. Use funds to pay back rent, other delinquent debts, or criminal or civil fines or judgments;
4. Conduct credit checks on participants;
5. Conduct background checks on participants;
6. Drug test participants;
7. Text message while driving;
8. Provide emergency shelter.

2.c Screening Process

>>INSERT PROGRAM NAME>> staff will carefully screen each person seeking Transitional Housing. Each potential program participant will complete an >>INSERT PROGRAM NAME>> Transitional Housing application. The application will verify their eligibility.

1. Verify victimization. Victims will be asked to verify they are a victim domestic violence, sexual assault, dating violence, or stalking. They will be asked to provide the following information:

- a. Either a written statement of the violence they identify or other information that can verify the incident; this may include a copy of a police report, medical care, or other documentation that supports the victimization they identify.
 - i. The documentation will also verify that the incident(s) they are verifying occurred within the past 6-months.
 - ii. *Whether they feel unsafe themselves and/or their family at the home they recently left.*
2. Seeking services. The victim will identify the services they are seeking from the >>INSERT PROGRAM NAME>> in writing through the >>INSERT PROGRAM NAME>> Transitional Housing Program application.
3. Length of program. The victim will identify their willingness to participate in the >>INSERT PROGRAM NAME>> for a minimum of 6-months to a maximum of 24-months in the >>INSERT PROGRAM NAME>> Transitional Housing Program application.

3. Request for Transitional Housing Program

Through the >>INSERT PROGRAM NAME>> Transitional Housing application, potential participants will request services and acknowledge their willingness to participate in the >>INSERT PROGRAM NAME>> Transitional Housing Program. They will:

- a. Complete the request for assistance section that identifies type of assistance requested;
- b. Acknowledge the housing lease will be in the participant's name; and
- c. Acknowledge that the rental subsidy will >>INSERT WHAT THE RENTAL SUBSIDY SCHEDULE WILL BE>>. *See section 4.a- Rental Subsidy for the breakdown of subsidies across household size and months.*
- d. Agree that the abuser will NOT be living in the home during participation in the >>INSERT PROGRAM NAME>> Transitional Housing Program.
- e. Agree their portion of the rent will be adjusted should they get a roommate.

4. Financial Assistance

The >>INSERT PROGRAM NAME>> will provide the following assistance to qualified program participants who are victims of domestic violence, sexual assault, dating violence, or stalking that have been accepted into the >>INSERT PROGRAM NAME>> Transitional Housing. >>INSERT PROGRAM NAME>> will deliver the financial assistance to the approved

vendor within agreed upon timelines for payment only with proper source documentation attached. Cash payments will NOT be issued to participants at any time.

4.a Rental subsidy

The >>INSERT PROGRAM NAME>> will provide Transitional Housing rental subsidies for a limited period >>WHAT IS THE LENGTH OF TIME THE SUBSIDIES WILL BE IN PLACE>>. The >>INSERT PROGRAM NAME>> will provide victims with a minimum of six (6) months and a maximum of >>INSERT THE MAXIMUM LENGTH OF RENTAL SUBSIDIES THAT WILL BE AVAILABEL>> months rental subsidy. Staff will make an initial determination for eligibility and need and set the subsidy schedule. The subsidy schedule for each participant will be reviewed regularly to ensure continued need. Rental subsidy payments will be paid directly to landlord. Rental subsidy will begin once the participant has been accepted into the program and has an approved landlord agreement in place. Payment will **NOT** be issued before that date. The following table is the approved breakdown of costs by household. >>INSERT RENTAL SUBSIDY SCHEDULE>>

Below is a sample rental schedule

Transitional Housing Rental Subsidy									
HHD	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9
4+	\$500	\$500	\$500	\$400	\$400	\$300	\$300	\$150	\$150
2+	\$400	\$400	\$400	\$300	\$300	\$200	\$200	\$125	\$125
1	\$300	\$300	\$300	\$200	\$200	\$150	\$150	\$100	\$100

>>DESCRIBE IF ANY DEPOSIT ASSISTANCE WILL BE PROVIDED>>(IF DEPOSIT ASSISTANCE IS AVAILABLE, INSERT PROGRAM NAME WILL PAY DESPOSIT ASSISTANCE ON IF >PROGRAM NAME> has an agreement with the landlord to return the deposit to >INSERT PROGRAM NAME>. If a deposit is returned after grant is closed, the funds will either be returned to OVW or used for an allowable activity under the grant program.

4.b Relocation Assistance

(DOES YOU'RE YOUR PROGRAM PROVIDE RELOCATION ASSISTANCE? IF YES, DESCRIBE THE ASSISTANCE, WHAT IT COVERS AND HOW/WHEN PARTICIPANTS CAN ACCESS IT.)

1. Request for Relocation Assistance. The >>INSERT PROGRAM NAME>> Transitional Housing participant will submit a request for assistance form to the >>INSERT PROGRAM NAME>> Advocate. The >>INSERT PROGRAM NAME>> Program Director

will review and approve or deny. If approved, the >>INSERT PROGRAM NAME>> Program Director will follow coding procedures to submit for request from finance. *See section 6 for coding procedure.* All checks will be made payable directly to the vendor, no funds will be disbursed directly to the >>INSERT PROGRAM NAME>> Transitional Housing participant.

4.c Transportation Assistance

DOES YOUR PRGRAM PROVIDE TRANSPORTATION ASSISTANCE?

- *IF IT DOES, DESCRIBE HOW STAFF/VOLUNTEERS PROVIDE TRANSPORTATION ASSISTANCE AND FOR WHAT PURPOSES.*
- *IF STAFF PROVIDE TRANSPORTATION, HOW WILL STAFF BE VERIFIED TO HAVE A VALID DRIVER'S LICENSE, INSURED/REGISTERED VEHICLE?*
- *WILL THEY TRANSPORT CHILDREN AND HOW WILL THE STAFF ENSURE CHILDREN HAVE ADEQUATE SEATBELTS AND CHILD RESTRAINTS?*
- *WILL THE PROGRAM PROVIDE ANY OTHER FORM OF TRANSPORTATION, IF SO, EXPLAIN HOW THE TRANSPORTATION WILL BE OFFERED, AND HOW WILL IT BE ACCESSED BY PROGRAM PARTICIPANTS AND FOR WHAT PURPOSE?*
- *Texting while driving. To decrease crashes by distracted drivers pursuant to Executive Order 13513, "Federal leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), and the Department of Justice, Office of Violence Against Women, all >>INSERT PROGRAM NAME> staff are banned from text messaging while driving any vehicle while working.*

4.d Childcare Assistance

WILL THE >>INSERT PROGRAM NAME>> PROVIDE CHILDCARE ASSISTANCE? IF SO, DESCRIBE WHAT THE CHILDCARE ASSISTANCE WILL BE USED FOR? Some examples of kinds of activities the childcare assistance can be used for may include: Job search/interview, academic preparation; medical reasons; mental health or cultural healing activities; educational group; civil/legal meetings related to the violence; or during relocating, etc.

HOW WILL A PARTICIPANT REQUEST CHILDCARE ASSISTANCE? Describe any limitations there might be. Assistance payment will be made directly to the childcare provider.

5. Victim Confidentiality

Confidentiality is the assurance that access to information regarding >>INSERT PROGRAM NAME>> thereby the >>INSERT PROGRAM NAME>> Transitional Housing participants seeking assistance and services shall be strictly controlled and that any violation is not only a breach of faith, but has the potential to threaten the safety and lives of a woman and her children.

All >>INSERT PROGRAM NAME>> employees (including paid staff, volunteers, interns, etc.) are guided by polices and must **NOT** disclose personal or confidential information to persons not authorized by law to receive such information. Any information released is only done so with an informed, signed, time-limited release to allow transfer of the specific information authorized by the victim/survivor. >>INSERT PROGRAM NAME>> staff take active steps to ensure the protection of victim/survivor personal identifying information/confidential information within the program, the organization and outside of the agencies/organization.

>>INSERT PROGRAM NAME>> will comply with the confidentiality requirements specified in the Violence Against Women Act of 2005, and in the Office on Violence Against Women's *Grant's Financial Management Guide*.

5.a Personally identifying information

>>INSERT PROGRAM NAME>> will protect all personal identifying information for Transitional Housing participants, including the following information:

1. First and last name;
2. Physical address of their home;
3. All contact information including: e-mail, mailing address, internet protocol address, phone or fax numbers;
4. Social Security number;
5. Tribal Identification number; and
6. Any other information which, when combined with any of the information specified above, would reveal identity of the >>INSERT PROGRAM NAME>> Transitional Housing participant.

5.b Disclosure of information

No person, regardless of relationship, employment, educational, political or social status shall have access to this information without a signed release of authorization; this includes relatives and systems personnel such as law enforcement, social and health services, court, tribal council, etc. Any information released will be used only for the purpose intended by

the >>*INSERT PROGRAM NAME*>> Transitional Housing participant authorizing the release of information with her/his informed consent.

The information referenced in *section 5.a* will **only** be disclosed under the following circumstances:

1. >>*INSERT PROGRAM NAME*>> staff, have attained the informed, written, specific, and time-limited consent of the victim to release the information. The time-period shall be only long enough to allow for the timely transfer of allowable information and expire. The signed release shall provide the specific details of what is allowed to be released. Blanket releases are prohibited.
2. >>*INSERT PROGRAM NAME*>> staff, will disclose the information under obligation from a court order or statutory mandate, but only after making reasonable attempts to provide notice of the disclosure to the victim, and taking steps to safeguard the privacy and personal safety by the individual(s) affected by the release.

5.c Storage of confidential information

Files and documents that contain personally identifiable information will be stored as follows:

1. *DESCRIBE HOW CONFIDENTIAL INFORMATION WILL BE STORED*
2. *DESCRIBE WHO WILL HAVE ACCESS TO CONFIDENTIAL INFORMATION*

6. Accounting Practices

To comply with >>*INSERT PROGRAM NAME*>> requirement to provide access to complete and accurate financial accounting records to staff from the U.S. Department of Justice including staff from the Office on Violence Against Women, the Office of the Chief Financial Officer at the Office of Justice Programs, and the Department's Office of the Inspector General. >>*INSERT PROGRAM NAME*>> will assign a coded identification structure to each participant who receives assistance through its >>*INSERT PROGRAM NAME*>> Transitional Housing program. The purpose of the code is to ensure that no personal identifying information about individuals who receive Transitional Housing assistance is a part of the financial accounting records for the grant award.

Specifically, >>*INSERT PROGRAM NAME*>> will use the following process to assign a confidential identification name or number to victims:

1. *DESCRIBE HOW YOU WILL CODE INFORMATION TO PROTECT THE IDENTITY OF VICTIMS/SURVIVORS YOU SERVE.*
2. *DESCRIBE WHO WILL MAINTAIN THE LIST OF NAMES AND CODES AND HOW THEY WILL BE PROTECTED.*

7. Document Retention Policy

>>INSERT PROGRAM NAME>> understands that it is crucial to have supporting records to support the requests received and approved for *Transitional Housing*. This documentation is necessary for financial auditing and program monitoring purposes. >>INSERT PROGRAM NAME>> agrees to retain all financial records, supporting documents, statistical records, and all other records for a minimum of 3 years following notification by the grant authorizing agency that the grant has been programmatically and fiscally closed **or** at least 3 years following the closure of its audit report covering the entire award period, whichever is later.

>>INSERT PROGRAM NAME>> will implement the following procedures to maintain the required documentation:

1. >>INSERT PROGRAM NAME>> will maintain and separately identify all records for each Federal fiscal period so that information desired may be readily located.
2. *DESCRIBE WHERE RECORDS ARE STORED.*
3. The Department of Justice (DOJ) grant-making component, the DOJ Office of the Inspector General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, shall have access to any documents, papers, or other records of recipients which are pertinent to the award, in order to make audits, examinations, excerpts, and transcripts.
4. The right of access is not limited to the required retention period; it lasts as long as the records are retained.
5. Only under extraordinary and rare circumstances would such access include review of information that would *personally identify victims of crime*. Routine monitoring cannot be considered extraordinary and rare circumstances that would necessitate access to this information. When access to the information that could personally identify victims of a crime is determined to be necessary, appropriate steps to protect this sensitive information shall be taken by both >>INSERT PROGRAM NAME>> and the DOJ grant-making component.
6. Any such access, other than under a court order or subpoena pursuant to a bona fide confidential investigation, must be approved by the Head of the DOJ grant-making component.

7. DESCRIBE ANY ELECTRONIC BACK-UP PROTECTIONS YOU HAVE IN PLACE FOR YOUR RECORDS.

8. Participant Grievance

DESCRIBE YOUR GRIEVANCE PROCEDURE. PROVIDE DETAIL ABOUT WHAT STEPS A PERSON WILL TAKE IF THEY BELIEVE THE PROGRAM HAS NOT TREATED THEM FAIRLY. LIST CONTACT INFORMATION OF PERTANENT INDIVIDUALS.