



Balance of State Continuum of Care Program Standards for EHH Homeless Prevention Programs

The Balance of State Continuum of Care developed the following EHH-funded Homeless Prevention Program standards to ensure:

- Program accountability to individuals and households, experiencing homelessness
- Program compliance with HUD and State of Wisconsin rules
- Program uniformity
- Adequate program staff competence and training, specific to the target population being served

Written Standards shall be followed in conjunction with the WI BOSCO Coordinated Entry Policy and Procedure manual. This includes, but is not limited to, waivers and exceptions approved by the CoC.

DEFINITIONS:

Household, - Household includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family. See HUD 24 CFR 5.403.

Homeless – For the purposes of Homeless Prevention, homeless means: An individual or household, who lacks a fixed, regular, and adequate nighttime residence, meaning: (1) An individual or household, with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; (2) An individual or household living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low- income individuals); or (3) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution. 24 CFR 576.2

Homeless Prevention –The Homeless Prevention Program is a state program authorized under Wisconsin Statute 16.303 and the HUD ESG Interim Rule 24 CFR 576.103. Homeless Prevention programs help individuals and households who are risk of homelessness retain housing/ Homeless prevention programs include housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or household from moving to an emergency shelter, a place not meant for human habitation, or another place described in paragraph (1) of the homeless definition.



PERSONNEL

STANDARD: The program shall be adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants.

CRITERIA:

1. The agency selects, for its service staff, only those employees and/or volunteers with appropriate knowledge or experience of working with individuals and households experiencing homelessness and/or other issues that put individuals or households at risk of housing instability.
2. The program provides training to all paid and volunteer staff on both the policies and procedures employed by the program and on specific skill areas as determined by the program.
3. All paid and volunteer service staff participate in ongoing and/or external training and development to further enhance their knowledge and ability to work with individuals and households, experiencing homelessness and/or other issues that put individuals or households, at risk of housing instability.
4. For programs that use HMIS, all HMIS users must abide by the standard operating procedures found in the HMIS Policies and Procedures manual. Additionally, users must adhere to the privacy and confidentiality terms set forth in the User Agreement.
5. Agency staff with responsibilities for supervision of the casework, counseling, and/or case management components have, at a minimum, a bachelor's degree in a human service-related field and/or demonstrated ability and experience that qualifies them to assume such responsibility.
6. Staff with supervisory responsibilities for overall program operations shall have, at a minimum, a bachelor's degree in a human service-related field and/or demonstrated ability and experience that qualifies them to assume such responsibility.
7. All staff have a written job description that at a minimum addresses the major tasks to be performed and the qualifications required for the position.
8. The program operates under an affirmative action/civil rights compliance plans or letters of assurance.
9. Case supervisors review current cases and individual service plans on a regular and consistent basis to ensure quality/coordinated services.

CLIENT INTAKE PROCESS

STANDARD: Programs are required to enroll participants exclusively through the WI BOSCO Coordinated Entry Prioritization List. Programs will follow the prioritization standards set forth by the WI BOSCO and will enroll the highest prioritized household when there are program openings.

CRITERIA:

1. The program will be an active member of the WI BOSCO Coordinated Entry System. Expectations for participating agencies and staff are detailed in the WI BOSCO Coordinated



Entry System Policies and Procedures. The program will have a current signed Agency Agreement and current signed Staff Agreements on file.

2. The program will be in good standing with the WI BOSCO with regards to participation in the Coordinated Entry System.
3. The program will use the WI BOSCO Coordinated Entry System Prioritization List to identify the highest prioritized household for program openings. The prioritization process is outlined in the CoC's Coordinated Entry Policies and Procedures. **(Appendix C)**
 - a. Service prioritization must look at all programs and services within the local coalition, not just within a single agency.
4. If the program does not enroll the highest prioritized household into the program, the client file will have documentation explaining why this happened.

STANDARD: The program will have minimal entry requirements to ensure those served are the most difficult to rehouse with the goal of maintaining housing. The program will assist participants in maintaining safe, affordable housing that meets participants' needs in accordance with client intake practices and within ESG/HPP guidelines for Homeless Prevention Programs.

CRITERIA:

1. All adult program participants must meet the following program eligibility requirements:
 - a. The household must meet either category 2, 3 or category 4 of the homeless definition, set forth by HUD in 24 CFR 576.2 Or they meet HUD's definition of "at risk of homelessness".
 - b. Household must have an annual income below 30% CMI (ESG) or 60% CMI (HPP) for the area at program entry.
 - c. Household must have a documented lack of sufficient resources and support networks to prevent homelessness.
2. Programs cannot disqualify an individual or household, because of evictions or poor rental history, criminal history, or credit history.
3. The program explains the services that are available and the requirements for participation and secures a commitment to participate in program services from each adult household member prior to admitting the individual or household, into the program. A copy of the program requirements is given to the household.
4. The program will maintain a Release of Information that allows the sharing of information with relevant people and/or agencies. Program participants will be offered copies of all Releases of Information that they have signed and have the right to revoke any Release of Information without penalty.

PROGRAM OPERATIONS

STANDARD: The program will assist participants in locating or maintaining safe, affordable housing that meets participants' needs in accordance with client intake practices and within program guidelines.

CRITERIA:



1. The program explains the program rules and expectations prior to admitting the individual or household, into the program. These rules and expectations should attempt to assure fairness, to avoid arbitrary decisions that may vary from client to client, or staff to staff.
2. In locating or maintaining housing, the program considers the needs of the individual or households, at risk of homelessness.
3. Programs will assess potential housing and current housing for compliance with EHH requirements for habitability, lead-based paint, and rent reasonableness and fair market rent standards prior to the participant signing a lease with the landlord, and the program signing a rental assistance agreement with the landlord. **(Appendix A & B)**
4. There must be a legally binding written lease between the tenant and the landlord. For rental arrears, a written lease is preferred but a verbal lease is acceptable.
5. The program signs a rental assistance agreement with the landlord. The program participant signs a lease with the landlord. The program and the participant sign a housing stabilization plan.

STANDARD: The program will enter data on all persons served and all activities assisted under ESG/HPP in HMIS. Domestic Violence Service Providers will, and legal services providers may, use a comparable database in accordance with HUD's standards.

CRITERIA:

1. All HMIS users must abide by the standard operating procedures found in the HMIS Policies and Procedures manual. Additionally, users must adhere to the privacy and confidentiality terms set forth in the User Agreement.
2. Domestic Violence Service Providers (DVSP) are prohibited by law from using HMIS. In place of HMIS, they are required to use a comparable database.
3. Legal service providers may choose to use either HMIS or an HMIS-comparable database. Legal service providers shall designate whether they will use HMIS or an HMIS-comparable database in their program policies and procedures.
4. All other ESG/HPP-funded Prevention providers must use HMIS.

STANDARD: The program will re-evaluate the program participant's eligibility for Prevention assistance and the amount and types of assistance the program participant needs not less than once annually.

CRITERIA:

1. The program will re-evaluate the household for continued eligibility a minimum of every 3 months. To continue to receive Prevention assistance, the household must demonstrate:
 - a. **Income eligibility.** The household's annual income must be at or below 30% CMI (ESG) and 60% CMI (HPP).
 - b. **Lack of resources and support networks.** The household must continue to lack sufficient resources and support networks to retain housing without program assistance.
 - c. **Need.** The program must determine the amount and type of assistance that the household needs/wants to (re)gain stability in permanent housing.



RENTAL ASSISTANCE

STANDARD: The program will provide short and/or medium-term rental assistance as necessary to help a program participant move as quickly as possible into permanent housing, retain permanent housing, and achieve stability in that housing.

CRITERIA:

1. Short-term assistance is up to three months of rent.
2. Medium-term assistance is for more than three up to a maximum of 24 months of rent.
3. Programs can provide a maximum of 24 months of assistance over a three-year period based on the household's needs. The maximum includes any payment of arrearages.
6. The program will provide assistance in accessing or maintaining suitable housing.
7. The program will provide assistance allowable under program guidelines applicable to household needs including but not limited to housing relocation and stabilization services and housing stability case management.
8. The program must provide VAWA lease addendum and VAWA notification.
9. Participants are not required to pay a portion of their income towards rent. If a Prevention Program does require participants to pay a portion of their income towards rent, that portion must be 30% of the participants income and the program must use the WI BOS rent calculation form. **(Appendix E)**

STANDARD: Rental assistance will only be provided after the program has documented the participant's unit meets Fair Market Rent and Rent Reasonableness standards.

CRITERIA:

1. The program will document in each client file proof that the assisted unit falls below both Fair Market Rent and rent reasonableness standards. **(Appendix A)**
2. The program will have a written policy and procedure for determining Rent Reasonableness that conforms to the standard described in the Appendix.
3. The unit must be affordable for the person(s) requesting assistance. An affordable unit is one in which the rent is no more than 50% of the household's adjusted gross income. However, if the rent is more than 50% of the household's adjusted gross income, the agency can still determine the unit is affordable after completing a detailed budget with the person(s) demonstrating they are able to maintain the monthly housing expenses.

HOUSING RELOCATION AND STABILIZATION SERVICES

STANDARD: The program will assist program participants in identifying and obtaining suitable housing with the goal that the participant will be able to maintain that housing after program exit.

CRITERIA:

1. Financial Assistance:
 - a. Rental application fees that are charged by the owner to all applicants.
 - b. Security deposits equal to no more than two months' rent.
 - c. Moving costs (e.g. truck rental, moving company, up to 3 months of storage).



- d. Arrearages: A one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears, provided this assistance will allow the household to retain their current permanent housing or to obtain new permanent housing.
 - e. Utility deposits required by the utility company of all customers.
 - f. Utility payments for the following utilities: gas, electric, water, and sewage
 - (1) Assistance can only be provided if the program participant or a member of the same household has an account in their name.
 - (2) Utility payment assistance can be provided for up to 24 months, including up to 6 months for payment in arrears.
 - (3) Payments may be made for all the approved utilities.
 - (4) A partial payment counts as one month
2. Housing Search and Placement assists participants in locating, obtaining, and retaining suitable permanent housing, which may include:
- a. Assessment of housing barriers, needs, and preferences
 - b. Development of an action plan for locating housing
 - c. Housing search
 - d. Outreach to and negotiation with owners
 - e. Assistance with submitting rental applications and understanding leases
 - f. Assessment of housing for compliance with ESG/HPP requirements for habitability, lead-based paint, and rent reasonableness
 - g. Assistance with obtaining utilities and making moving arrangements
 - h. Tenant counseling
3. Programs can provide a maximum of 24 months of housing relocation and stabilization services during any three-year period.

HOUSING STABILITY CASE MANAGEMENT

STANDARD: The program shall provide access to case management services by qualified staff to each individual or household, participating in the program. While services are voluntary for people participating in the program, they are required to be offered by case managers.

CRITERIA:

1. Individual case management is provided to program participants based on household need at least monthly and until the Prevention program ends.
2. Housing stability case management services can be provided for a maximum of 24 months while the participant is living in permanent housing.
3. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing.
4. Services include assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent



housing or to assist a program participant in overcoming immediate barriers to obtaining housing.

5. Component services consist of:
 - a. Using the WI BOSCOCC Coordinated Entry System to identify households for enrollment into the program.
 - b. Verifying and documenting eligibility for the program.
 - c. Developing an individualized housing and service plan, including planning a path to permanent housing stability.
 - d. Developing, securing, and coordinating services.
 - e. Obtaining Federal, State, and local benefits.
 - f. Monitoring and evaluating program participant progress.
 - g. Providing information about, and referrals to, other providers.
 - h. Conducting re-evaluations to determine on-going program eligibility.
6. Programs can provide a maximum of 24 months of housing relocation and stabilization services during any three-year period.

OTHER STABILIZATION SERVICES

STANDARD: The program may provide additional services to help program participants achieve housing stability.

CRITERIA:

1. Mediation between the program participant and the owner or person(s) with whom the participant is living
2. Legal Services to resolve a legal problem that prohibits a program participant from obtaining or retaining permanent housing, including:
 - a. Client intake
 - b. Preparation of cases for trial
 - c. Provision of legal advice
 - d. Representation at hearings
 - e. Counseling
 - f. Filing fees and other necessary court costs
3. Programs can provide a maximum of 24 months of other stabilization services during any three-year period.

SERVICE COORDINATION

STANDARD: The program will assist program participants, pursuant to 24 CFR §576.400, in obtaining appropriate supportive services and other Federal, State, local, and private assistance available for such individuals as needed and requested by the household. Staff should be knowledgeable about mainstream programs and services in the community.

CRITERIA:



1. Arrangements shall be made as appropriate with community agencies and individuals for the provision of education, employment, and training; schools and enrichment programs; healthcare and dental clinics; mental health resources; chemical dependency assessments and treatment; legal services; budgeting and credit repair; and other assistance requested by the participant, which are not provided directly by the program.
2. Mainstream resources for which, if eligible, a client should be assisted in obtaining, including but not limited to: Emergency homeless services, Emergency Financial Assistance; domestic abuse-related programming (includes advocacy, support groups, children's services, etc.); local Housing Authorities, public housing, rent subsidies and subsidized housing; temporary labor agencies; childcare resources and public programs that subsidize childcare; consumer credit counseling service agencies; youth development and child welfare; Community Support Programs; WIC; Food Share; Unemployment Insurance; Social Security benefits; Badgercare; Medicaid/Medicare.

EMERGENCY TRANSFERS

STANDARD: The program must have and implement an emergency transfer plan that meets the requirements of 24 CFR 5.2005(e) and 24 CFR 576.409(d)(3).

CRITERIA:

1. All projects shall comply with the WI BOSCOE Emergency Transfer Plan policy. Program participants requesting an emergency transfer will be prioritized above other households and are exempt from coordinated entry. **(Appendix D)**
2. The program's emergency transfer plan must specify what will happen with respect to the non-transferring family member(s), if the family separates in order to affect an emergency transfer.
 - a. When a family participating in ESG/HPP-funded Prevention separates in response to domestic violence, dating violence, sexual assault, or stalking, the program will bifurcate the lease and continue providing rental and utility assistance (at minimum) for the family members who are not evicted or removed.
3. If a program participant meets the conditions for an emergency transfer, ESG/HPP funds may be used to pay amounts owed for breaking a lease to affect an emergency transfer. These costs are not subject to the 24-month limit on rental assistance.

TERMINATION

STANDARD: Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and examine all extenuating circumstances when determining if violations are serious enough to warrant termination.

CRITERIA:

1. In terminating assistance to a program participant, the agency must follow the due process provisions set forth in 24 CFR 576.402, as well as the following process: (1) providing the program participant with a written copy of the program rules and the termination process



before the participant begins to receive assistance; (2) written notice to the program participant containing a clear statement of the reason for termination; (3) a review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and (4) prompt written notice of the final decision to the program participant.

2. Termination under this section does not bar the program from providing further assistance at a later date to the same individual or household.
3. Programs must have termination policies documented in their prevention program policies and procedures manual.

FOLLOW-UP SERVICES

STANDARD: The program shall provide a continuity of services to all participants following their exit from the program. These services can be provided directly and/or through referrals to other agencies or individuals.

CRITERIA:

1. The program develops housing stability plans with the participant to ensure continued housing stability and connection with community resources, as desired.
2. The program should attempt to follow up with phone or written contact at least once after the client exits the program. A program may provide follow-up services that include identification of additional needs and referral to other agency or community resources in order to prevent future episodes of homelessness.

CLIENT FILES

STANDARD: The documentation necessary for the effective delivery and tracking of service will be kept up to date and the confidentiality of program participants will be maintained.

CRITERIA:

1. The file maintained on each participant should, at a minimum, include information required by HUD, the CoC, and the State EHH Grant Administrator. This includes, but is not limited to, participation agreements, service plans, case notes, information on the services provided both directly and through referrals to community agencies and individuals, and any follow-up and evaluation data that are compiled.
2. Client information must be entered into HMIS in accordance with the data quality, timeliness and additional requirements found in the HMIS Policies and Procedures manual. If an organization is prohibited from using HMIS, the organization is required to fully participate in the use of a comparable database. At a minimum, programs must record the date the client enters and exits the program, and update the client's information as changes occur. This criterion applies only to those agencies which use HMIS.



3. The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate except to project staff and other agencies as required by law. Participants must give informed consent to release any client identifying data to be utilized for research, teaching and public interpretation.
4. All records pertaining to the household must be retained for 5 years and/or according to funding requirements after the expenditure of all funds from the grant under which the program participant was served. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

EVALUATION AND PLANNING:

STANDARD: Ongoing program planning and evaluation will be conducted.

CRITERIA:

1. The program has written goals and objectives for its services to meet the outcomes required by HUD and the State of Wisconsin.
2. The program reviews the case management, housing, and follow-up needs of program participants and the existing services that are available to meet these needs. As appropriate, revisions to goals, objectives and activities are made based on program evaluation.
3. The program exhibits due regard for participant privacy in conducting and reporting its evaluation.
4. The program will evaluate data for efficiency, outcomes, reoccurrence rates, and other objective criteria to ensure program integrity.



APPENDIX

Appendix A

Fair Market Rent and Rent Reasonableness

Each project must have specific policies and procedures created in accordance with the ESG interim rule and the Balance of State written standards regarding fair market rent and rent reasonableness.

Compliance with rent reasonableness must be documented prior to executing a lease for a unit.

Fair Market Rent

1. Fair Market Rent is a rent amount based on unit size and geographic location. It is determined by HUD annually. FMRs for each fiscal year can be found by visiting HUD's website at: <https://www.huduser.gov/portal/datasets/fmr.html>
 - a. ESG: A unit's rent and utility allowance must together be at or below the fair market rent value for the area.
 - b. HPP: A unit's rent and utility allowance must together be at or below 110% of the fair market rent value for the area. Exceptions may be granted by DEHCR on a case-by-case basis.

Rent Reasonableness

1. Rent reasonableness is defined as reasonable in relation to rents being charged for comparable unassisted units in the same market. Rent reasonableness is determined by considering the gross rent of the proposed unit and the location, quality, size, type, and age of the unit, any amenities, maintenance, and utilities to be provided by the owner.
2. The gross rent of the proposed unit must be compared to three similar unit. "Similar" is defined as:
 - a. Same location as the proposed unit (either neighborhood or town)
 - b. Same number of bedrooms
 - c. Same type of unit (multi-family, duplex, single family home, etc)
3. To calculate the gross rent for purposes of determining whether it meets the rent reasonableness standards, project must consider the entire housing cost:
 - a. Rent plus the cost of any utilities that must, according to the lease, be the responsibility of the tenant.
 - b. Utility costs may include gas, electric, water, sewer, and trash. However, telephone, cable or satellite, television service, and internet service shall be excluded.
 - c. The gross rent does not include pet fees or late fees that the program participant may accrue for failing to pay the rent by the due date established in the lease.
4. Comparable rents can be checked by any of the following methods:
 - a. By reviewing advertisements for comparable rental units.
 - b. Completed Owner's Certification on the Request for Tenancy Approval form.



- c. Written verification signed by the property owner or management company, on letterhead, affirming that the rent for a unit assisted with CoC Program funds is comparable to current rents charged for similar unassisted units managed by the same owner
5. To keep the administrative burden to a minimum, rent reasonableness documentation does not have to be collected for each individual unit. Rather, rent data may be collected at the neighborhood or community level, as long as the case manager or other staff making the determination verifies the documentation is appropriate for the proposed unit and includes the documentation in each client file.
6. Rent reasonableness must be reviewed annually.
7. The rent reasonableness standard is determined by averaging the gross rent of the three comparison units. The proposed unit meets the rent reasonableness standard if it is lower than \$50 above the average of the three comparable rents.

a. **Example:**

	Gross Rent
Proposed Unit	\$640.00
Unit 1	\$650.00
Unit 2	\$630.00
Unit 3	\$625.00

To calculate the average, you add the unit 1 gross rent (\$650) plus unit 2 gross rent (\$630) plus unit 3 gross rent (\$625) equals = \$1,905 and divide by the number of units used (3) equals = \$635.

Add the \$50 standard ($\$635 + \$50 = \685). \$685 is the maximum allowable rent that meets the rent reasonableness standard for this unit.

In the example, the proposed unit meets the rent reasonableness standard because it is lower than \$685. It is \$640.

8. The policies must include a description and process for addressing special circumstances. For example, in some cases it may be difficult to identify units that match on location, building type, and number of bedrooms. A policy could include supervisor approval to review a broader geographic range or look at units that have the same number of bedrooms and are in the same geographic location but are in other types of buildings.

A sample "Rent Reasonableness Checklist and Certification" form is available at www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc

Information about FMR and rent reasonableness: <https://www.hudexchange.info/resources/documents/CoC-Rent-Reasonableness-and-FMR.pdf>



Appendix B

Habitability Standards

1. Each project must have specific policies and procedures created in accordance with the COC interim rule and the Balance of State written standards regarding Habitability standards inspections.
2. Habitability inspections do not need to be completed by a certified Habitability inspector, but the inspectors should have prior training and understanding of requirements.
3. A unit must pass Habitability before assistance can be provided or a lease can be signed. If while the client is on a program, staff observes a potential Habitability fail, or if the client or landlord reports a concern that may be fail, the Habitability inspector will inspect the unit.
4. If the Habitability inspector fails the unit during an initial or re-inspection, an owner (or tenant if it is their damage) has 30 days to fix those issues. The repair checklist requires that both the owner and tenant sign, but a Habitability inspector *must* do a re-inspection once the repairs are reported complete.
 - a. If the repairs are not complete within 30 days of notification to the owner, the project cannot pay any rent to the owner. If the client is in the unit, rent must be withheld until the unit passes a Habitability inspection. If it is a new unit that has not been leased up, the project should encourage the client to look at other units. No lease may be signed until the unit passes a Habitability inspection, including lease renewals.
5. The policies must include a description of general inspection process of units. Any agency can choose to conduct these monthly, quarterly, or not at all. This inspection can be done by a non-Habitability trained staff. The purpose is to look for any new damage or anything causing the unit to fail an inspection. This can include an infestation, housekeeping issues, leaks, appliance issues, etc.

The approved HUD forms can be found at:

<https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>



Appendix C

Appendix C

Order of Priority for EHH Prevention Recipients of EHH Program

Recipients of EHH program-funded Homeless Prevention are required to follow the order of priority when selecting participants for housing in accordance with the CoC's written standards while also considering the goals and any identified target populations served by the project, and in a manner consistent with their current grant agreement.

Due diligence should be exercised when conducting outreach and assessment to ensure that persons are served in the order of priority adopted by the BOSCO.

1st Priority: Those who are imminently at-risk of homelessness and have the highest assessment score and the longest days since referral.

2nd Priority: Those who are at-risk of homelessness with the highest assessment score and the longest days since referral.



Appendix D

Wisconsin Balance of State Continuum of Care

Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Emergency Transfers

The Wisconsin Balance of State Continuum of Care (WIBOSCOC) is concerned about the safety of the participants in its housing programs, and such concern extends to participants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),¹ housing providers in the WIBOSCOC must allow participants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the participant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.² The ability of a housing program to honor such request for participants currently receiving assistance, however, may depend upon a preliminary determination that the participants is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the housing program has another dwelling unit that is available and is safe to offer the participants for temporary or more permanent occupancy.

This plan identifies participants 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 participants 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 WIBOSCOC and COC funded providers are in compliance with VAWA.

Eligibility for Emergency Transfers

¹ Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

² Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.



A participant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the participants reasonably believes that there is a threat of imminent harm from further violence if the participants remains within the same unit. If the participant is a victim of sexual assault, the participant 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. A participant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

If a request is granted, the participant would be exempt from going through the Coordinated Entry process.

Emergency Transfer Request Documentation

To request an emergency transfer, the participants shall notify the housing provider or management office and submit a written request for a transfer to. The housing program will provide reasonable accommodations to this policy for individuals with disabilities. The participant's written request for an emergency transfer should include either:

1. A statement expressing that the participants reasonably believes that there is a threat of imminent harm from further violence if the participants were to remain in the same dwelling unit assisted under the housing program; OR
2. A statement that the participants was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the participant's request for an emergency transfer.

Confidentiality

The housing program will keep confidential any information that the participants submits in requesting an emergency transfer, and information about the emergency transfer, unless the participants give the housing program 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 includes keeping confidential the new location of the dwelling unit of the participants, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the participants. See the Notice of Occupancy Rights under the "Violence Against Women Act For All Participants" for more information



about the housing program's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Since it is possible to identify many victims in rural states or small communities with only ethnicity or age and zip code, the information that victim service providers can share must be carefully scrutinized and limited. In addition, non-personally identifying information must be further protected by being "de-identified, encrypted, or otherwise encoded.

Emergency Transfer Timing and Availability

The WIBOSCOC and COC funded housing program cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. The housing program will, however, act as quickly as possible to move a participant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a participant reasonably believes a proposed transfer would not be safe, the participants may request a transfer to a different unit. If a unit is available, the transferred participants must agree to abide by the terms and conditions that govern occupancy in the unit to which the participants has been transferred. The housing program may be unable to transfer a participant to a particular unit if the participants has not or cannot establish eligibility for that unit.

If the housing program has no safe and available units for which a participant who needs an emergency is eligible, the housing program will assist the participants in identifying other housing providers who may have safe and available units to which the participants could move. At the participant's request, the housing program will also assist participants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Safety and Security of Participants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the participants is urged to take all reasonable precautions to be safe. Participants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Participants 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/>.



Participants 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>.

Additional organizations in the WI Balance of State offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking can be found at <https://www.endabusewi.org/get-help/>

For WI Tribal Domestic Violence, Sexual Assault, and Dual Agency information: <https://s3-us-east-2.amazonaws.com/edaw-webinars/wp-content/uploads/2019/12/05153652/Wisconsin-Tribal-Programs.pdf>



Appendix E

The WI BOS Rent calculation form can be found at:

https://www.wiboscoc.org/uploads/3/7/2/4/37244219/2020_new_wibos_approved_income_rent_calculation_form_1.xls

Income, Rent & Utility Calculation Worksheets

The two tabs provided in this document will allow you to calculate a household's income, allowable subsidy amount and tenant's portion of rent. Information should only be entered into YELLOW CELLS.

Step 1: DETERMINING INCOME ELIGIBILITY

All clients have to meet a certain income requirement to be eligible for rental assistance. You will need ask your client their income then back up what is determined as income through documents/verification.

Step One:	Refer to the Accepted forms of Income Verification Chart in order to collect correct income documentation/verification.
Step Two:	Begin to complete Tab 2: Rental Calc, Section I: Gross Household Income.
Step Three:	If client is eligible print off worksheet once completing Step 2 and place in client file, along with proper income documentation/verification, and the Accepted forms of Income Verification Chart

Step 2: RENTAL CALCULATION

This sheet is to be used if client will be receiving rental assistance.

Step One:	Complete Section II: Allowances. Enter in # of dependents and all allowances for household. The income will adjust to the allowances automatically. If an allowance is not listed, it should not be considered in calculating rent subsidy.
Step Two:	Complete Section III: Adjusted Income. Enter in the county income limits. Check box of household's applicable income unit.
Step Three:	Complete Section IV: Enter in the unit rent. The tenant rent payment will automatically be calculated. Enter in reasonable rent determined using either Go Section 8 software system or Rent reasonableness determination form. No subsidy should be paid on rents that are not reasonable.
If Utilities are not included in the rent complete the third tab: Utility Allowance using the website provided at the top of the worksheet. The total from this sheet will automatically be entered into Section V of Tab 2.	
Step Four:	Complete Section V only if utilities are <u>NOT</u> included in rent. Find out which utilities are not included in rent. List all utilities in Tab #3: Utility Allowances.



Step Six:	Utilities amount entered on Tab 3 will carry over to Section V of Tab 2. Enter the Rent reasonable payment standard in the yellow box to determine if you can pay that subsidy amount. No subsidy should be paid on rents that are not reasonable.
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