MEMORANDUM

To: System Coordination Committee
From: Ja’Nai Aubry (Director of CoC Strategies)
Date: November 10, 2020
Re: DV Rapid Rehousing Policy

In 2019, Ruby’s Place was awarded HUD Domestic Violence Bonus funding to provide Rapid Rehousing (RRH) for domestic violence and human trafficking survivors. Ruby’s Place is currently executing a contract with HUD and plans to begin its RRH program in December 2020.

On November 5th, domestic violence service providers from Ruby’s Place, SAVE, Family Violence Law Center, and Building Futures met to review Rapid Rehousing policies from other communities and develop a set of recommendations for providing Rapid Rehousing (RRH) services to domestic violence and human trafficking survivors in Alameda County. The following are a set of recommendations for inclusion in Alameda County’s RRH written standards, as the 2013 ESG Policies & Procedures and Housing Crisis Response System manuals do not provide guidance on the legal requirements or best practices for providing RRH services to survivors.

TheDV working group recommends that any amendments to previous RRH standards or new RRH written standards include the following policies and best practices:

- **VAWA Mandated Requirements:**
  1. **Emergency transfer plan** that allows clients that are survivors of domestic violence, dating violence, sexual assault, stalking or human trafficking to transfer to another unit if they believe there is a threat of imminent harm from further violence if the client remains in their current dwelling.
     - *Notice of occupancy rights/VAWA Lease Addendum*- All clients should be given a notice of their rights under VAWA.
     - *Confidentiality*- Transfer requests and documentation submitted as proof should be kept confidential and should only be shared with individuals that are necessary to complete the transfer.
  2. **Lease Bifurcation policy** that allows housing providers to remove an abuser from a lease without removing or terminating a survivor’s lease or rental/utility assistance.
  3. **Data Privacy & Safety policy**: Victim service providers are prohibited from entering survivors’ personally identifying information in HMIS. Instead, HUD
regulations allow victim service providers to use a comparable database to generate aggregate data for reporting.

- **De-identification option:** If a survivor’s information has already been entered into HMIS, they should have the option to de-identify the information or be removed from the database.

4. **Voluntary C.E. Participation:** HUD recommends that CoC and ESG funded victim service providers either participate in an integrated C.E. system or develop a parallel C.E. system. [See DV C.E. FAQ here](#)

- **Best Practices**
  1. **Housing First:** Clients are not denied access to, evicted or terminated from rental assistance because they have a history of domestic violence or are currently experiencing domestic violence.
  2. **Safety Planning:** Ensure that housing placements meet the unique safety needs of survivors, by considering the proximity of a housing placement to a survivor’s previous home or an abuser’s home, place of employment, or family members.
  3. **Client Centered Services**
     - Flexibility regarding length of rental assistance and services depending on a client’s needs, including up to 24 months of rental assistance.
  4. **Trauma Informed Care** included as a best practice and annual training.
  5. **Domestic Violence Training** for all homeless service providers.
  6. **Coordination between homeless services and victim service providers:**
     Examples include case conferencing and C.E./HMIS training for victim service providers.