
KS-505 JOHNSON COUNTY CONTINUUM OF CARE WRITTEN STANDARDS & POLICIES

Version history

- *FINAL DOCUMENT – Adopted 7.15.17*
- *Amended Prioritization Standards, page 2 – 9.3.2021*
- *Amended 9.13.23 to add CoC Policies section*

Preamble

The Continuum of Care (CoC) is responsible for establishing and consistently following written standards for administering assistance. Written standards provide a reference for coordinating and implementing a system to meet the needs of the population and subpopulations experiencing homelessness within the geographic area of the KS-505 Johnson County Continuum of Care (KS-505). Both the Emergency Solutions Grant (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH) Continuum of Care Project Interim Rules and Regulations state that CoCs, “in consultation with recipients of ESG project funds within the geographic area, are intended to coordinate service delivery...and assist CoCs and their recipients in evaluating the eligibility of individuals and families consistently and administering assistance fairly and methodically” § 578.7(a)(9).

The KS-505 written standards serve as a reference for all CoC and ESG recipients to uphold these funding source requirements by establishing community-wide expectations and standards, clarifying local priorities, documenting the system for prioritizing assistance per project type, and outlining a strategy for use of limited resources. The KS-505 written standards have been established to ensure that persons experiencing homelessness who enter projects throughout the CoC will be given unvarying information and support to access and maintain permanent housing and enable the CoC to end homelessness.

For each project type, the standards outline the purpose of the project type, eligibility criteria, prioritization, minimum standards of assistance, client access, and performance standards. As a baseline, the KS-505 has adopted current minimum standards set by HUD for all CoC funded projects and has adopted the Johnson County ESG standards as noted in the most recent Consolidated Plan. All projects that receive ESG or CoC funding are required to abide by these written standards. The CoC strongly encourages projects that do not receive either of these sources of funds to accept and utilize these written standards.

The *Continuum of Care Written Standards* are implemented in coordination with *the Coordinated Entry Policies and Procedures*. Specifically, the following written standards for administering assistance within the Johnson County CoC geographic area serve as a reference to:

- Assist with the coordination of service delivery across the geographic area and are the foundation of the Coordinated Entry system
- Assist in assessing individuals and families consistently to determine project eligibility
- Set prioritization standards for administering assistance that are in line with strategies outlined by the CoC’s vision and guiding principles for local targets that are complimentary to those within HUD’s *Opening Doors*

- Assist in administering projects fairly and methodically to meet funding regulations
- Establish common core performance measures for all CoC and ESG component types
- Provide the basis for monitoring CoC and ESG funded projects
- Establish how standards will be reviewed regularly and evaluated for effectiveness

Ongoing Review & Evaluation

As a document that represents the CoC, its housing and services available, populations, as well as local goals and values, these standards serve as a resource for providing assistance across the continuum in order to end homelessness.

The standards are to be reviewed regularly in order to ensure the system of providing assistance is transparent, ensure local priorities are clear to all recipients, and as a CoC that limited resources are being used strategically. To guarantee the written standards are implemented comprehensively, project performance, HMIS data, Coordinated Entry tracking, as well as project participant and stakeholder input will all be considered when evaluating the written standards for effectiveness. As noted in the KS-505 governance charter, ongoing review and evaluation will be completed at least annually.

Prioritization Standards

The written standards establish the community-wide expectation of how resources are to be targeted within the community separate from meeting eligibility requirements, and specific to prioritizing assistance according to population and household types. Project participants must always meet eligibility criteria while all individuals and household types can be prioritized for a type of assistance. As prescribed in the Coordinated Entry Policies & Procedures, CoCs are instructed to prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. Populations, households, and housing prioritized for assistance include:

Tier 1 includes the following categories:

- Veteran
- Chronically Homeless
- Attempting or fleeing Domestic Violence
- Unsheltered

Tier 2 includes the following categories:

- Disability
- Elderly (60 and above)
- Transitional Aged Youth (individual ages 18 – 24)
- Household with minor children

Permanent housing supports (including PSH and RRH) will be the assistance prioritized by their scoring on KS-505's vulnerability tool – DESC's Vulnerability assessment tool (DESC-VAT). If the household is experiencing domestic violence, their score on the Lethality Assessment Program (LAP) tool may also be incorporated. A Housing First Model and low barrier housing approach encompassing the core components of the model is to be prioritized for housing supports in the county.

Project Requirements for All Component Types

- Projects must have written policies and procedures and consistently apply them to all participants
- Projects that serve households with children must comply with the following:

- ✓ A staff person must be designated as the educational liaison that will ensure children are enrolled in school, connected to appropriate services in the community, including early childhood project such as Head Start, Part C of the Individuals with Disabilities Education Act, and the McKinney Vento education services
- ✓ The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that provides shelter for families with children
- Projects receiving ESG and CoC funding must participate in HMIS
- All CoC and ESG funded projects must participate in the development and refining of the KS-505's Coordinated Entry system
- Eligibility requirements as defined by CoC and ESG funding are the standard for receiving assistance. Additional project requirements for eligibility are not the standard and cannot be grounds for rejection. Project participants can only be rejected because the eligibility criteria as defined by CoC and ESG funding and noted in the written standards is not met.
- Projects must have a formal procedure for terminating assistance to a participant that abides all project funding, state and federal regulations.

Project Requirements Specific to ESG-funded Projects

Projects funded with ESG funds will be expected to adhere to the following to be considered in good project standing and align with the standards:

- Project will be familiar with and adhere to all project requirements of ESG as stated in Title 24 of the Code of Federal Regulations, Part 576
- Project will work with KS-505 CoC lead agency staff in developing and implementing the Johnson County Continuum of Care Plan
- Collaborate with other homeless providers in the operation of the project
- Participate in trainings and coordination meetings
- Cooperate with related research and evaluation activities
- Prioritize referrals from homeless service providers within KS-505's Continuum of Care as it relates to the Coordinated Entry System
- Meet high standards of professionalism in implementing the project
- Conform to all fiscal accountability standards required by the federal governments (24CFR, Part 84)

Objectives and Outcomes Specific to ESG Funded Project

- Suitable living environment
- Affordable housing and affordability of services
- Creating economic opportunities
- Availability and accessibility of services and housing
- Sustainability of the above stated objectives

Strategic Planning Objectives Specific to CoC Funded Projects

- Increase the number of beds prioritized to serve chronically homeless and unsheltered households
- Increase housing stability
- Increase project participant income
- Increase the number of participants obtaining mainstream benefits
- Increase the number of individuals and households with children served by Rapid Rehousing

Written Standards by Project Type

The project types directly providing homeless housing and services included within the written standards and their location within the document are listed below.

- Homelessness Prevention (HP) p.4
- Outreach p.5
- Emergency Shelter (ES) p.5
- Rapid Re-housing (RRH) p.6
- Transitional Housing (TH) p.7
- Permanent Supportive Housing (PSH) p.8
- Homeless Management Information System (HMIS) p.8

ACCESSING ASSISTANCE

The KS-505 Johnson County Continuum of Care's *Coordinated Entry Policies and Procedures* is to be referenced per assistance type as it relates to *accessing assistance*. The *Policies and Procedures* outline the standardized access, assessment, and referral process for housing and other services across agencies in a community. This process is not intended to determine acceptance into a program; it is meant to prioritize community services based on need. This process is intended to assure household eligibility for waiting list acceptance with programs having the ability and responsibility to ensure that household needs are best served by their program. The goal of Coordinated Entry is to link all Emergency Solutions Grant, CoC funded, and non-CoC funded programs in order to best assess households to effectively and efficiently refer households to services. The *Coordinated Entry Policies and Procedures* can be found on the KS-505 Johnson County Continuum of Care's lead agency's website ucsjoco.org.

HOMELESSNESS PREVENTION (ESG)

Homeless Prevention activities are available to persons who are homeless or at risk of becoming homeless. Homeless prevention assistance can be used to prevent an eligible individual or family from becoming homeless or to help to regain stability in their current housing or other permanent housing. Eligible activities include housing relocation and stabilization services as well as short and medium-term rental assistance.

Eligibility Criteria (ESG)

- Participants must meet the HUD definition of homelessness or at risk of becoming homeless.
- Participants must have combined income below 30% Area Median Income (AMI).
- Participant must be a Johnson County resident.
- Participant lacks identifiable financial resources and/or support networks.

Accessing Assistance

- The Coordinated Entry System screens potential participants for prevention services or housing assistance needs.

Minimum Standard of Assistance (ESG)

- Up to three months in arrear payments
- Up to three months of utility payments (arrears, deposit, and/or current utility bill)
- Rental assistance is provided up to a maximum of 3 months (not including arrear payments)

Performance Standard: Expected Outcomes

- Reduce the Number of Homeless Households Seeking Emergency Shelter
 - 75% of clients will access permanent housing
 - 75% of clients will maintain Permanent Housing for six (6) months.

OUTREACH (ESG)

Street Outreach serves unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Services are provided to eligible participants residing in a place not meant for human habitation. Essential services of street outreach include: engagement, case management, emergency health and mental health services, and transportation, and services for special population.

Eligibility Criteria

- Participants must meet the HUD definition of unsheltered homelessness.

Accessing Assistance

- The Coordinated Entry System screens participants for housing assistance needs.

Minimum Standard of Assistance

- Please note, due to the varying nature of Outreach projects that may function within the CoC, the official minimum standards of assistance are tailored to align with the specific purpose of the particular project (e.g. youth focused street outreach projects).

Performance Standards: Expected Outcomes

- Expand Homeless Outreach Services
 - 50% of clients will access housing (ES, TH, SH, PH or PSH)
 - 75% of clients will access Essential Services (see those listed above)

EMERGENCY SHELTERS

Essential services of emergency shelter include: case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.

Eligibility Criteria

- Participants must meet the HUD definition of homelessness

Minimum Standard of Assistance

- Provision of shelter, food, and personal care items.
- Assistance in transitioning to permanent housing

Accessing Assistance

- The Coordinated Entry System screens participants for housing assistance needs.

Performance Standards: Expected Outcomes

- Reduce Rates of Homelessness

- Average length of stay is less than 90 days
- 75% of clients with more than 90 days in shelter exit to permanent destinations.
- 75% of clients with 90 days or less in shelter, exit to destination other than homelessness.

RAPID RE-HOUSING PROJECTS (RRH)

Rapid Re-Housing is available to help those who are literally homeless be quickly and permanently housed. Rapid Re-Housing Projects (RRH) provide housing relocation and stabilization services and short or medium term rental assistance as needed to help a homeless individual or family move as quickly as possible to permanent housing and achieve stability in that housing. Please note, Rapid Rehousing funds are available through both CoC and ESG.

Eligibility Criteria (ESG)

- Participants must meet the HUD definition of homelessness.
- Participants must have combined income below 30% Area Median Income (AMI).
- Participant must be a Johnson County resident.
- Participant lacks identifiable financial resources and/or support networks.

Minimum Standards of Assistance (ESG)

- A set rental stipend of up to three months with the possibility of a one-time three month extension with written approval from organizational staff administering RRH programming.
- Up to three months for utility payments (arrears, deposit, or first month's rent)
- Rental assistance is provided for a maximum of 3 months (not including arrear payments)
- Assistance will not be adjusted over time
- Follow-up will occur at minimum monthly while participants are receiving assistance
- Follow-up will occur at six months after discharge

Eligibility Criteria (CoC)

- Participants must meet the HUD definition of homelessness.
- Participants lack identifiable financial resources and/or support networks

Minimum Standards of Assistance (CoC)

- A rental subsidy based on income for six months with the possibility to extend assistance (no arrears)
- The rental subsidy amount will account for participants paying no more than 30% of their adjusted income or 10% of their gross income towards rent
- Assistance may be extended
- Supportive services designed to meet the needs of the project participants must be made available to the project participants throughout the duration of RRH assistance
- Follow-up will occur at minimum monthly while participants are receiving assistance
- Follow-up will occur at six months after discharge

Accessing Assistance

- The Coordinated Entry System screens potential participants for permanent housing assistance eligibility.

Performance Standards: Expected Outcomes

- Reduce the Number the Length of Homelessness for Homeless Households
 - At least 80% of households served will be placed in/access permanent housing within 60 days.
 - At least 75% of households served will maintain permanent housing for 180 days after discharge.

Performance Standards: Strategic Planning Objectives

- 80% or more of all households remain stable in RRH or exit to other permanent housing destinations
- 56% or more of eligible adult participants will be enrolled in mainstream (non-cash) benefits
- 54% or more of households will increase total income prior to exit
- 20% or more of households will have income from employment
- 20% or more of households will increase income from employment prior to exit

TRANSITIONAL HOUSING PROGRAMS

Transitional Housing (TH) is designed to provide homeless individuals and families with interim stability and support to successfully move to and maintain permanent housing.

Eligibility Criteria

- Participants must meet the HUD definition of homelessness

Minimum Standards of Assistance

- Maximum length of stay cannot exceed 24 months
- Assistance in transitioning to permanent housing must be provided
- Support services must be provided throughout the duration of stay in transitional housing
- Project participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months

Accessing Assistance

- The Coordinated Entry System screens potential participants for housing assistance needs.

Performance Standards: Strategic Planning Objectives

- 80% or more of all households will exit to permanent housing destinations
- 56% or more of eligible adult participants will be enrolled in mainstream (non-cash) benefits
- 54% or more of households will increase total income prior to exit
- 20% or more of households will have income from employment
- 20% or more of households will increase income from employment prior to exit

PERMANENT SUPPORTIVE HOUSING

Permanent Supportive Housing (PSH) for persons with disabilities is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability.

Eligibility Criteria

- Participants must meet the HUD definition of homelessness
- PSH can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability.

Minimum Standards of Assistance

- There can be no predetermined length of stay for a PSH project
- Supportive services designed to meet the needs of the project participants must be made available to the project participants throughout the duration of stay in PSH
- Project participants in PSH must enter into a lease (or sublease) agreement for an initial term of at least one year that is renewable and is terminable only for cause. Leases (or subleases) must be renewable for a minimum term of one month.

Accessing Assistance

- The Coordinated Entry System screens potential participants for permanent supportive housing assistance eligibility.

Performance Standards: Strategic Planning Objectives

- 80% or more of all households remain stable in PSH or exit to other permanent housing destinations
- 56% or more of eligible adult participants will be enrolled in mainstream (non-cash) benefits
- 54% or more of households will increase total income prior to exit
- 20% or more of households will have income from employment
- 20% or more of households will increase income from employment prior to exit

HOMELESS MANAGEMENT INFORMATION SYSTEM

Under the HEARTH Act, HMIS participation is a statutory requirement for all CoC and ESG funded projects. Victims service providers must use a comparable database that produces unduplicated and aggregate reports in its place. The KS-505 is responsible for designating the HMIS lead who is responsible for the operation and administration of the HMIS. Currently, Kansas Statewide Homeless Coalition is KS-505's HMIS lead agency.

Minimum Standards

- Produce an unduplicated count of persons experiencing homelessness for the CoC
- Describe the extent and nature of homelessness within the CoC
- Identify patterns of service use
- Measure program effectiveness

Performance Standards: Expected Outcomes

- Increase and Maintain Data Quality within HMIS
 - No more than 5% missing or null data for all required fields.

CoC POLICIES

Anti-Discrimination Policy

Policy Overview

The KS-505 Johnson County Continuum of Care (CoC) does not tolerate discrimination on the basis of actual or perceived: race, color, national origin, immigration status, ancestry, ethnicity, religion, primary language, age, familial status, veteran status, disability, sex, sexual orientation, gender identity or expression, marital status, experiences of violence (including but not limited to domestic, dating, sexual, or hate violence), source of income, justice system involvement, or any other discrimination prohibited by law, regulation, executive or court order.

The CoC and CoC Housing Providers shall comply with this policy and all applicable equal access, fair housing, and nondiscrimination provisions of federal, state, and local civil rights laws to maintain compliance. This policy provides guidance to all individuals involved within the CoC to prevent discrimination in Housing Provider policies and during any interactions with the individuals served throughout the CoC.

Federal Regulations Applicable to CoC and ESG Programs

The Fair Housing Act: prohibits discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin.

- <https://www.justice.gov/crt/fair-housing-act-1>

Affirmatively Furthering Fair Housing Rule: provides an approach to aid housing providers in taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

• <https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing>
Equal Access in Accordance with an Individual's Gender Identity: regulation ensures that HUD's housing and shelter programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.

- <https://www.federalregister.gov/documents/2012/02/03/2012-2343/equal-access-to-housing-in-hud-programs-regardless-of-sexual-orientation-or-gender-identity>

Civil Rights Act of 1964: Title VI prohibits all recipients of federal financial assistance from discrimination based on race, color, or national origin.

- <https://www.justice.gov/crt/fcs/TitleVI>

Americans with Disabilities Act: prohibits discrimination against persons with disabilities in all programs, activities, and services of a public entity (i.e., state or local government; or department, HP, special purpose district, or other instrumentality of a state, or local government).

- <https://www.ada.gov/law-and-regs/title-ii-2010-regulations/>

Age Discrimination Act of 1975: prohibits discrimination based upon age in federally assisted and funded programs or activities, except in limited circumstances.

- <https://www.dol.gov/agencies/oasam/regulatory/statutes/age-discrimination-act>

Dissemination and Evaluation

All agencies that have programs and services funded by CoC and ESG must manage a responsible and sound operation in accordance with federal and local nondiscrimination and equal opportunity provisions, as codified in the federal regulations listed in the section above. This includes establishing agency anti-discrimination policies and grievance procedures and sharing all policy and procedures with clients, staff, volunteers, and contractors. Agencies must make these policies and procedures publicly available on their websites and through other commonly used public

notification processes. Agencies must ensure staff, volunteers and contractors are regularly trained to comply with all anti-discrimination policies and procedures.

The CoC Board or a CoC Committee will annually review data from the system to determine if any race or gender or other types of disparities exist. Analysis is aimed to understand where gaps in services may exist and will be disseminated to CoC Housing Providers to allow for input.

The CoC Lead Agency will host a Fair Housing training annually for CoC members. All agencies that receive CoC and/or ESG funds must participate annually in trainings that cover both the (1) Fair Housing Act and (2) the Equal Access Final Rule. Agencies may participate in a training provided by the CoC or an alternate provider. One training may be able to cover both topics.

Reporting Violations of Anti-Discrimination

KS-505 CoC’s Anti-Discrimination Policy is intended to encourage and enable individuals being served by Housing Providers and other agencies operating within Johnson County to raise serious concerns internally, and/or externally, so the Housing Provider, KS-505 CoC, HUD, and/or other appropriate entities can address and correct discriminatory conduct and actions.

Any individual who believes they have been discriminated against by the CoC and/or Housing Providers has the right to make an official report of such events. Additionally, any individual who believes they have witnessed discrimination by the CoC and/or Housing Providers has the right to report such events as well.

Individuals reporting can do so by following the determined reporting process outlined in each entities Grievance Policy:

- Housing Providers Grievance Reporting
 - Each Housing Provider is required to have their own internal grievance reporting process that is readily available to anyone who may need to officially report a violation.
 - Each Housing Provider is responsible for notifying the CoC Lead Agency of its grievance reporting process so that proper referrals can be made.
- KS-505 CoC Reporting
 - Anyone who would like to report discrimination within the CoC or a Housing Provider can do so by emailing cocgrievance@ucsjoco.org . CoC grievances are received by the CoC Lead Agency, the CoC Board Co-Chairs, and the CoC Board Secretary.
- HUD Discrimination Reporting: instructions on how to report discrimination online, by phone, or by email can be found at https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint

Resources

The Department of Housing and Urban Development and the National Alliance to End Homelessness offer many trainings and resources for agencies to develop their anti-discrimination policies, procedures, and staff trainings. Contact the CoC Lead Agency for recommendations on trainings and resources. This checklist can be used by agencies to develop anti-discrimination policies that align with the CoC’s anti-discrimination policies.

YES	NO	Checklist Questions	Notes
		Does your agency have an anti-discrimination policy?	
		Are anti-discrimination policies and procedures publicly available on the agency’s website? Are the	

		policies provided to people presenting for services and/or posted in a common area?	
		Is there a stated plan to train new staff and clearly communicate this policy during the onboarding process? Is annual training provided for staff, volunteers, and contractors?	
		Is there a clear statement about non-discrimination because of race, ethnicity, color, national origin, language, ancestry, religion, sex, familial status, age, gender identity, LGBTQ+ status, marital status, domestic or sexual violence victim status, or sensory, mental, or physical disability?	
		Is there an equal access policy? If so, does it include specific procedures for working with transgender persons?	
		Are procedures spelled out that demonstrate how the clients, agency, staff, volunteers, and contractors will carry out the agency's anti-discrimination policies?	
		Are there grievance and anti-retaliation policies and procedures? If so, are they shared with each person presenting for services?	

VAWA Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking – Rapid Rehousing and Permanent Supportive Housing Projects

Emergency Transfers

The Johnson County Continuum of Care on Homelessness (KS-505) is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), KS-505 allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of KS-505's CoC funded agencies 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.

This plan applies to CoC grant funded housing projects. The plan for ESG funded housing projects can be found in the ESG Handbook at <https://kshousingcorp.org/homeless-services/emergency-solutions-grant/>. 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 the following regulations:

HUD 24 CFR, Part 5, Subpart L: <https://www.ecfr.gov/current/title-24/subtitle-A/part-5/subpart-L>

VAWA 2022: <https://www.justice.gov/crt/violence-against-women-act-reauthorization-act-2022-vawa-2022-housing-rights-subpart>

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, is eligible for an emergency transfer, if

1. The tenant expressly requests the transfer, and
2. Either:
 - 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
 - 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

Tenants who are not in compliance with the project's rules may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation and Recordkeeping

To request an emergency transfer, the tenant shall notify the landlord and the KS-505 CoC funded agency and submit the KS-505 VAWA Emergency Transfer Form to the Agency. The landlord and funded agency will provide reasonable accommodations to this policy for individuals with disabilities. The VAWA Emergency Transfer Form will be accepted in written or electronic form. The tenant's written request for an emergency transfer should include either:

1. 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 unit assisted under KS-505's program; OR
2. 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.

Agencies must document each transfer request and the outcome of the request. Records must be retained for at least 3 years. Outcomes of Emergency Transfer Requests must be reported to HUD annually. Agencies must report deidentified Emergency Transfer Request results to the CoC Lead Agency annually including the number of transfers requested, the number of transfers granted, and the length of time needed to process each transfer.

Confidentiality

KS-505 CoC, its funded agencies, and the landlord will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives KS-505 CoC, its funded agencies, and landlord 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 tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the regulation links above for more information about KS-505 CoC's responsibility to maintain the confidentiality of information related

to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

KS-505 cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request form. KS-505 CoC funded agencies and their landlords 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. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. 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 has been transferred. KS-505 CoC funded agencies may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

In addition, if KS-505 CoC funded agency has no safe and available units for which a tenant who needs an emergency transfer is eligible, KS-505 CoC funded agency 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, KS-505 CoC funded agencies will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are listed below.

Emergency Transfer Process Assistance

Any KS-505 CoC funded agency needing assistance with VAWA Emergency Transfer Requests, process and placement, safety planning concerns, or confidentiality concerns, should contact the CoC Lead Agency or the Kansas City HUD Field Office immediately.

Safety and Security of Tenants

During the processing of the transfer and the actual transfer, the tenant is urged to take all reasonable precautions to be safe.

Tenants who have been victims of domestic violence are encouraged to contact local and national resources for assistance in creating a safety plan, finding a local shelter, and/or getting legal assistance.

- Safehome: domestic violence shelter and supportive services in Johnson County, 913-262-2868
- Kansas City Metro Domestic Violence hotline to find other domestic violence shelters in the KC metro: 816-HOTLINE (816-468-5463)
- Kansas Legal Services
- National Domestic Violence Hotline: 800-799-7233. For persons with hearing impairments, the hotline can be accessed by calling 800-787-3224 (TTY).

Tenants who have been victims of sexual assault are encouraged to contact:

- MOCSA: supportive services for victims of sexual assault in Kansas City metro area, 913-642-0233
- The National Sexual Assault Hotline is 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>.

Tenants with safety issues may also seek help through the Safe At Home program administered by the Kansas Attorney General's Office. Safe At Home administers an address confidentiality program for victims of domestic violence, sexual assault, stalking, and human trafficking. Safehome administers the Safe At Home Program in Johnson County, contact 913-262-2868.

Implementation

It shall be the responsibility of KS-505 CoC funded agencies to ensure that any landlord receiving funds from a KS-505 CoC grant is informed and adhering to these policies and procedures.