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CoC Advisory Board Agenda
August 14, 2019 ‖8:10 AM – 9:40 AM
SETA, 925 Del Paso Blvd., Sacramento, CA 95815 – Sequoia Room

I. **Welcome & Introductions:** Sarah Bontrager, Chair	
II. **Review and Approval of July 10, 2019 Minutes:** Emily Halcon, Secretary	
III. **Chair's Report**	
IV. **CEO's Report:** Lisa Bates	
V. **New Business**	

A. FY2019 CoC Program NOFA-Item: Executive Committee Action on behalf of the CoC Board to revise the New Project Scoring Tool criteria for DV Bonus based on new language in the NOFA	- Presenter(s): Kate Casarino, SSF CoC and Contracts Coordinator	8:20 AM (5 minutes)	Information
B. FY2019 CoC Program NOFA-Item: Approval of CoC-Level Policies for CoC Application - **Violence Against Women Act (VAWA) Compliance** - **Anti-Discrimination/Fair Housing Compliance**	- Presenter(s): Michele Watts, SSF Chief Programs Officer	8:25 AM (15 minutes)	Discussion
C. FY2019 CoC Program NOFA-Item: Updates	Presenter(s): Emily Halcon & Sarah Bontrager, PRC Co-Chair & Member; Michele Watts	8:40 AM (5 minutes)	Information

D. Item: Collaborative Shelter Plan – Single Shelters	- Presenter(s): Andrew Guerkink, City of Sacramento & Susan Lal, County of Sacramento	8:45 AM (15 minutes)	Information
E. Collaborative Data Dashboards Preview	- Presenter(s): City of Sacramento, County of Sacramento, & SSF	9:00 AM (30 minutes)	Information
F. Item: CESH Update	- Presenter(s): Greg Schuelke, SSF CoC Program Manager	9:30 AM (5 minutes)	Information
VI. Announcements			
VII. Meeting Adjourned			

Receive & File Items
- Follow Ups Report 8/9/19
- Annual Business Cycle Calendar

Upcoming Committee Meetings: TO BE UPDATED
– Governance Committee (Special Charter Meeting 8/14/19, Regular Committee Meeting 8/21/19)
– Combined CES Evaluation and CES Committees (8/19/19)
– PIT Committee (8/21/19)
– Performance Review Committee (8/27-28/19)
– Executive Committee Meeting (8/29/19)
– Homeless Youth Taskforce (9/4/19)

Next Meeting: September 11, 2019

Please note that today's meeting is being recorded and the digital file will be available at sacramentostepsforward.org under Continuum of Care, Agendas and Minutes.

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CoC Board Meeting

Wednesday, July 10, 2019 | 8:10 AM – 9:40 AM
925 Del Paso Boulevard, Suite 200, Sacramento, CA 95815 | Sequoia Room

Attendance:

Member	Area of Representation	Present
Alexis Bernard	Mental Health Service Orgranization	Yes
Amani Sawires Rapaski	Substance Abuse	Yes
Angela Upshaw	Veterans	Yes
April Wick	People with Disabilities	Yes
Christie M. Gonzales	Mental Health Service Organization	Yes
Cindy Cavanaugh	County of Sacramento	Yes
Ct. Dan Monk	Law Enforcement – City	Yes
Emily Bender	Youth & LGBT	Yes
Emily Halcon	City of Sacramento	Yes
Erin Johansen	Mental Health	Yes
Jameson Parker	Business Community & Street Outreach	Yes
John Foley	Homeless Services Provider	Yes
John Kraintz	Lived Experience	Yes
Julie Davis-Jaffe	Employment Development	Yes
Lt. Julie Pederson	Law Enforcement – County	No
Lashanda McCauley	Formerly Homeless – Family	Yes
MaryLiz Paulson	Housing Authority	Yes
Mike Jaske	Faith Community Advocate	Yes
Noel Kammermann	Local Homeless Coalition/Network	Yes
Peter Beilenson	Mental Health – County	No
Sarah Bontrager	City of Elk Grove	Yes
Stefan Heisler	City of Rancho Cordova	Yes
Stephanie Cotter	Ciyt of Citrus Heights	Yes

Staff	Title
Lisa Bates	SSF CEO
Kate Casarino	SSF CoC & Contracts Coordinator
Michele Watts	SSF CPO

I. Call to Order & Welcome: Sarah Bontrager, Chair		
Sarah Bontrager, Chair, called the meeting to order at 8:16 AM.		
II. Minutes	Presenter: Emily Halcon, Secretary	Information
Motion to approve June 12, 2019 meeting minutes as presented: 1st – Jameson Parker, 2nd – MaryLiz Paulson. MSC. Abstain: Cindy Cavanaigh, Erin Johansen		
III. Chairs Report	Presenter: Sarah Bontrager	Information
The SSF Board of Directors held 1st of 3 strategy meetings. They are looking at big picture direction of SSF.		
IV. SSF CEO's Report	Presenter: Lisa Bates	Information
The PIT Count Report was released, as well as the CoC Program NOFA. HUD Monitoring will occur at SSF at the end of July to review CoC and programs. SSF is preparing and will reach out to providers for certain documentation. SSF will share audit results. SHRA approached SSF for help with Coordinated Entry and Capital Park project.		
V. Item A: Executive Committee Action on behalf of the COC Board to correct the scope of the round 2 CESH application approved by the full Board in May 2019	Presenter: Sarah Bontrager	Information
The activities the board approved in May 2019 actually fell under two categories, 5 & 6, but the Board officially only approved category 5. Since it was a technical correction, the Executive Committee approved the addition of category 6.		
Item B: 2019 PIT Report Presentation and Q&A	Presenter: Arturo Baiocchi & Susanna Curry, CSUS	Information
Arturo and Susanna presented the results of the 2019 PIT Count.		
Item C: System Work	Presenter: Lisa Bates	Action
HomeBase has been hired as consultant for systems work improvement. HCD to give agreement soon. HCD is also offering TA.		
Motion to approve recommended actions - Limit HCD TA requests to projects that are (1) specific in scope, (2) not already covered in the system work plan, and (3) aligned with the existing system-level goals approved in September 2018; and Delegate review of a revised youth-specific TA proposal that meets these criteria to the		

Executive Committee prior to agendizing at a future CoC Board meeting: 1st Erin Johansen, 2nd John Foley. (MSC)		
Item D: FY2019 COC NOFA Competition Update	Presenter: Emily Halcon PRC Co-Chair and Michele Watts, SSF Chief Programs Officer	Information
NOFA competition deadline is September 30th. No changes need to made to the Scoring Tools. A Special Meeting may need to be held to approve the Priority List in September. The CoC will need to adopt policies on Anti-Discrimination & VAWA compliance and will be presented in August. Additionally, the CoC will also need to adopt the 2019 Governance Charter, which will be recommended in August or September.		
Item E: Program Cost Review Update	Presenter: Emily Halcon	Information
The PRC reports that HomeBase conducted cost per program analysis and it confirmed that is difficult to compare projects because all projects are different. Currently, the information gathered cannot be translated into a score. The PRC is not dropping this as a possible scoring factor, but it will not be used during the 2019 NOFA competition. This may be a deeper CoC conversation in the future.		
VI. Announcements	Presenter: Sarah Bontrager	Information
Announcements were not forgoed.		
X. Adjourn		
The meeting was adjourned at 9:41 AM.		

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To: Sacramento CoC Advisory Board

From: Executive Committee

Date: August 14, 2019

Subject: New Project Scoring Tool – Minor Change

The Executive Committee voted to approve minor revisions to the 2019 New Project Scoring Tool per changes in the 2019 CoC NOFA (Section II.B.10.e). This year, the NOFA includes new language about DV Bonus projects using "trauma-informed and client-centered" approaches. The New Project Scoring Tool revisions incorporate this language in two sections (see pages 2 & 6, with track changes); these small changes will help ensure that the CoC and DV Bonus projects are well positioned in the 2019 competition.

Attachments:
New Project Scoring Tool

2019 New Project Scoring Tool

Summary of Factors & Point Allocations	
1. **Threshold Factors**	N/A
2. **Housing**	25 points
3. **Services**	20 points
4. **Agency Capacity**	20 points

5. **Prioritization, option of:**
    a. **Prioritization for New Projects Except for DV Bonus**
    b. **Prioritization for DV Bonus**
	25 points

6. **Community**	10 points
TOTAL	100 points

1. THRESHOLD FACTORS

Name	Description	Met/Not Met
Housing First	The project's policies will include a commitment to identifying and lowering its barriers to housing and provide housing and services in line with a Housing First approach.	Met/Not Met
Coordinated Entry	The project will participate in coordinated entry to the full extent possible for this project type.	Met/Not Met
HMIS	The project will enter data for all CoC-funded beds into HMIS (or parallel database for domestic violence services).	Met/Not Met
Formerly Homeless Input	The agency includes homeless or formerly homeless individual in feedback and decision-making processes.	Met/Not Met
Basic Compliance with HUD Policies	The agency has adequate internal financial controls, adequate record maintenance and management, and adequate policies regarding termination of assistance, client appeals, ADA requirements, and confidentiality.	Met/Not Met
Eligible Clients	The project will only accept new participants if they can be documented as eligible for this project's program type based on their housing and disability status.	Met/Not Met
Eligible Applicant	Neither the applicant nor the sub-recipients (if any) are for-profit entities.	Met/Not Met
Equal Access	The project will provide equal access and fair housing without regard to sexual orientation, gender identity, or local residency status.	Met/Not Met
Match	Agency will be able to provide 25% match per grant.	Met/Not Met

Affirmatively Furthering Fair Housing	Agency will actively prevent discrimination by affirmatively accommodating people based on differences in: race, color, ancestry, or national origin; religion; mental or physical disability; sex, gender, or sexual orientation; marital or familial status, including pregnancy, children, and custody arrangements; genetic information; source of income; other arbitrary characteristics not relevant to a person's need or suitability for housing	Met/Not Met
Budget	Project has made a good faith effort to complete the budget template provided, showing both CoC and non-CoC funding sources for the project.	Met/Not Met
For DV Bonus Projects Only: Serving DV	Project is 100% dedicated to serving victims who are fleeing or attempting to flee domestic violence, including dating violence, sexual assault, stalking, and/or human trafficking who came from sheltered or unsheltered situations. The project must follow a Housing First model and utilize trauma-informed and client-centered approaches.	Met/Not Met

Deleted: approach

2. HOUSING (25 pts.)

Name	Description	Sources	Score
2.A. Fully Described and Appropriate Housing	Award points for a housing design that: • is clearly and fully described • has a layout or features that are thoughtfully matched to the target population • is strategically located to meet the needs of the target population • is physically accessible to persons with disabilities • will help maximize client choice in the CoC (e.g. by including a plan to evaluate each client's needs, strengths, and preferences in order to determine which mainstream benefits and/or jobs the client could qualify for Additionally, for Victim Service Providers: • is designed to protect the safety of the population they serve	RFI	Up to **10** points
2.B. Ready to Start	Award points if the project will be ready to begin housing clients within 3 months of receiving HUD funding. Consider: • Whether the agency has adequately described how the project will acquire the necessary housing for the project type. For RRH, this may include landlord engagement strategies;	RFI	Up to **5** points

Name	Description	Sources	Score
	• Whether the project site faces regulatory obstacles such as tenant displacement, environmental issues, or zoning issues; • Whether the agency's current staff has the capacity to begin preparing for this project; • Whether the agency already has policies and procedures that can be used as-is or easily adapted for use in a CoC-funded project		
2.C. Program Outcomes	Award points if: • The project's goals are realistic and sufficiently challenging given the scale of the project • Outcomes are measureable and appropriate to the population being served, and must meet minimum CoC-adopted targets, including: 　○ At least 85% of clients experience positive housing outcomes 　○ At least 55% of adult clients maintain or increase their income from all sources • Prospective outcomes reflect actual performance outcomes from other projects administered by the applicant (as appropriate).	RFI	Up to **10** points

3. <u>SERVICES (20 pts.)</u>

Name	Description	Sources	Score
3.A. Appropriate Supportive Services	Award points for services that: • use a Housing First approach, • offer ongoing support to stay housed, • are comprehensive and well-coordinated, • include culture-specific elements, and • are thoughtfully matched to the target population For projects that will be referring specific types of clients to specific outside services, award points if the project explains a concrete plan for referrals, giving examples of: • Who will be referred; • The agencies that will accept referrals; • The types of services to be provided; and • The logic behind the agency's referral scheme	RFI	Up to **10** points

	For Victim Service Providers award points for services that improve the safety for survivors of domestic violence, dating violence, sexual assault, stalking, and/or human trafficking		
3.B. Relevant Experience	Award points if the agency submitting this application has demonstrated, through past performance, the ability to successfully carry out the work proposed and has successfully served homeless people as a particular group. Consider the experience of the agency in handling a similar project (e.g. if the project will involve relocation of tenants, what experience does the agency have with relocation).	RFI	Up to **10** points

4. <u>AGENCY CAPACITY (20 pts.)</u>

Name	Description	Sources	Score
4.A. Budget	Award points based on the bullet points below: • Project has submitted a budget that is clear, complete, and easy to read. • The budget shows that the project will have enough resources to provide high-quality, reliable services to the target population. • The budget shows that the project will leverage significant outside resources (funding, staff, building space, volunteers, etc.) rather than rely entirely on CoC funds. • The budget shows that the project is taking appropriate measures to contain costs.	Budget RFI	Up to **5** points

4.B. Agency Capacity	Award points if agency:
	Has successfully handled at least one other federal grant or other major grant of this size and complexity, either in or out of the CoC (or can otherwise demonstrate that it can successfully manage complex reporting requirements).
	• Has sufficient fiscal capacity to manage the grant, including:
	    ○ internal financial controls
	    ○ grant match tracking
	    ○ well-maintained records
	    ○ oversight by a board of directors
	    ○ a strategy for documenting eligible costs
		e-LOCCs
		
		E-Snaps
			Up to **10** points

	- a strategy for ensuring adequate grant drawdowns - Is large enough to handle the expected client case load; - Is familiar with innovative or evidence-based practices; - Includes at least one person with formal training and/or education in a relevant social services field			
4.C. Audit and Monitoring Findings	Award full points if the agency was not audited or monitored or if no irregularities have been revealed by any audits or monitoring. Award up to 3 points if the agency adequately explains how the irregularities found by auditors or monitors will be addressed or have been addressed. Award no points if the agency's audits or monitoring revealed misconduct that has not been corrected.	All HUD, SSF, or financial audits from last 2 years. RFI	Up to **5** points

5A. PRIORITIZATION FOR NEW PROJECTS EXCEPT DV BONUS (25 pts.)

Name	Description	Sources	Score
5.A.1. Community Priority	Award points if the project addresses the priority need identified by the Advisory Committee in 2019: Permanent Supportive Housing, with targeted services for either youth or seniors. Please note that HUD may require that Permanent Supportive Housing be dedicated to persons experiencing Chronic Homelessness.	E-snaps RFI	Up to **15** points
5.A.2. Severity of Needs & Special Considerations	Award points to projects that will serve population(s) with severe needs and vulnerabilities (e.g. chronically homeless, history of domestic violence), and will also fill an important gap in housing and services for persons experiencing homelessness in the Sacramento region (e.g., serving a unique population, leveraging certain funding, maintaining site based housing).	RFI APR	Up to **10** points

	Applicants should specifically consider the needs and vulnerabilities of youth and seniors.		

5B. PRIORITIZATION FOR DV BONUS HOUSING (25 pts.)

*Use this section **instead of** the previous page if the project is applying for DV Bonus funding. For all scoring purposes, "domestic violence" also includes dating violence, sexual assault, stalking, and/or trafficking.*

Name	Description	Source	Score
5.B.1. How Project will Address Need	Award points for each of the following items: • Project provides data describing the CoC's population of domestic violence survivors • Project explains how it proposes to meet the unmet needs of domestic violence survivors, especially with survivors who come from unsheltered situations. • The project will have housing that is specifically designed to accommodate the needs of survivors. • The project's staff has skills that are specifically needed to identify and locate survivors, or to persuade survivors to accept and enter housing. • The project's staff utilize trauma-informed and client-centered approaches.	RFI	Up to **5** points
5.B.2. Previous Performance	Award points if the agency has experience serving, or demonstrates a plan to serve, victims who are fleeing, or attempting to flee, domestic violence, which includes dating violence, sexual assault, stalking, and/or human trafficking, and that experience, or plan, specifically shows that they can serve victims who come from unsheltered situations.	RFI	Up to **10** points
5.B.3. Ability to Meet Safety Outcomes	Award points for each of the following items: • The project articulates a specific plan for ensuring that its residents will be safe from further domestic violence. • The project sets quantitative safety targets that are appropriate and realistic. • The project explains why it is likely to be able to achieve the targeted safety outcomes.	RFI	Up to **10** points

6. COMMUNITY (10 pts.)

Name	Description	Sources	Score
6.A. Participation in CoC Activities	Award points for the agency's attendance, participation, and leadership at CoC events, meetings, committees, forums, and projects, with a focus on activities that took place since the last NOFA. Typically, full points should be awarded if the agency meaningfully participated in at least 4 voluntary events over the course of the year, or if the agency led at least 1 successful event, training, or initiative over the course of the year.	RFI	Up to **5** points
6.B. Local Competition Deadlines	Award full points if the project met all local competition deadlines, including deadlines for turning in supporting documents and attachments. • Award 3 points if any portion of the local application was turned in <u>up to</u> 24 hours late. • Award no points if any mandatory portion of the local application was <u>more than</u> 24 hours late. • If any mandatory portion of the local application was more than 72 hours late, the project may be disqualified at the discretion of the Panel.	HomeBase analysis	Up to **5** points

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To: Sacramento CoC Advisory Board

From: Michele Watts, Sacramento Steps Forward Chief Programs Officer

Date: July 10, 2019

Subject: CoC Adoption of HUD-Mandated Policies

Background
In preparation for the FY2019 HUD CoC Program competition, the CoC Advisory Board must adopt local policies pertaining to anti-discrimination and domestic violence as detailed below.

Anti-Discrimination Policy & Training
NOFA applicants must indicate whether the CoC has implemented a CoC-wide anti-discrimination policy. An annual training with CoC providers on how to effectively implement the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity (Equal Access Final Rule) is also required. Additionally, the application should indicate whether an annual training with CoC providers on how to effectively implement the Rule in accordance with an individual's gender identity in Community Planning Development Programs is conducted. HomeBase, as part of their TA contract with the CoC/SSF, has provided examples of non-discrimination policies established by other localities (attached). SSF recommends the Board develop and approve a policy to optimize our application score.

Compliance with Violence Against Women Act (VAWA) Rule
The grants awarded under the CoC NOFA must comply with the VAWA rule (24 CFR 578.99(j)). Compliance with this rule requires that each CoC establish an emergency transfer plan and make related updates to the written standards for administering CoC program assistance. These tasks are required to be completed by the time the local HUD Field Office issues the first grant agreement for a project in the CoC's geographic area for projects awarded funds in the FY 2019 CoC Program Competition. HomeBase has outlined these requirements (attached) and apply to all CoC-funded PSH, RRH, and TH programs. SSF recommends the Board develop and approve a policy for compliance to optimize our application score.

Attachments:
Anti-Discrimination Policy
VAWA Policy

The Board will review the policies in August for approval in September:
- Adoption of the Anti-Discrimination Policy & Training.
- Adoption of Compliance with Violence Against Women Act (VAWA) Rule.

Sacramento Continuum of Care Violence Against Women Act (VAWA) Requirements for CoC-Funded Programs Compliance Policy

All CoC-funded programs are required to protect the rights, privacy and safety of survivors of domestic violence, dating violence, sexual assault or stalking. Programs are prohibited to deny, terminate, or evict a person as "a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy."

I. Required Forms and Notices

    A. The program must provide each applicant and participant with a *Notice of Occupancy Rights* under the Violence Against Women Act and a *Certification of Domestic Violence* form in the following situations:
        1. When the applicant is denied housing assistance;
        2. When the participant is provided housing assistance or admitted into the housing program;
        3. With any notification of eviction or notice of termination or assistance; and
        4. During the annual recertification or lease renewal process, whichever is applicable, or if there is not recertification or lease renewal, through other means.

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

    C. The *Certification of Domestic Violence* form will provide space for the applicant to state:
        1. That they are a survivor of domestic violence, dating violence, sexual assault or stalking;
        2. That the incident that is the ground for protection meets the applicable definition for such incident under 24 CFR 5.2003; and
        3. The name of the individual who committed the violent act, if the name is known and safe to provide.

D. For tenant-based rental assistance (TBRA), the program must ensure that the landlord or manager of the housing provides the *Notice of Occupancy Rights* under the Violence Against Women Act and a *Certification of Domestic Violence* form to the program participant with any notification of eviction.

II. Contracts and Leases

A. For tenant-based rental assistance (TBRA), a program must require the following:
1. The lease between the landlord and participant includes a provision for all requirements that apply to tenants under 24 CFR part 5, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c);
2. A statement that the "owner/landlord will comply with 24 CFR part 5, subpart L";

B. For programs that are not TBRA, a program must include the following provisions in any lease or occupancy agreement between the program and the participant:
1. The program allows the participant to terminate the lease, sublease or occupancy agreement without penalty if the program determines that the participant qualifies for an emergency transfer under the requirements of the emergency transfer plan
2. The program must follow the terms of the VAWA Final Rule (24 CFR part 5, subpart L). The term may be narrowed to specify this requirement is for only as long as CoC assistance is being contributed to the unit.

C. Confidentiality Requirements
1. Any information submitted to the program or landlord, including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, or stalking (confidential information), shall be maintained in strict confidence.
2. The program shall not enter confidential information into any shared database or disclose to another entity, except to the extent that the disclosure is: (i) Requested or consented to in writing by the individual in a time-limited release (ii) Required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program; or (iii) Otherwise required by applicable law.

III. Emergency Transfers
A. A participant is eligible for an emergency transfer if:
1. The participant expressly requests the transfer; and
2. The participant is a survivor of domestic violence, dating violence sexual assault, or stalking; and
3. Either
   a. The participant reasonably believes there is a threat of imminent harm from further violence if the participant remains in the same dwelling unit; or

b. The participant is a survivor of sexual assault that occurred on the premises within the 90-calendar-day period preceding the date of the request for transfer.

B. Participants can submit an emergency transfer request directly to program staff, certifying that they meet the emergency transfer qualification requirements. The program may request additional documentation of the event for which the participant is requesting an emergency transfer, but is not required to do so. No other documentation is required.

C. The program must notify the Coordinated Entry System (CES) team that an emergency transfer request is being made and indicate whether the request is an internal transfer, an external transfer, or both.
   1. Internal transfer occurs when a participant is relocated to a new unit with the same program, without having to undergo an application process
   2. External transfer occurs when a participant is relocated to a new unit in a different program in the CoC.
   3. A participant can pursue both an internal and external transfer at the same time in order to transfer to the next available safe unit in the CoC.

D. If the participant resides in a TBRA unit, the program will take reasonable steps to support the participant in securing a new, safe unit as soon as possible and a transfer may not be necessary.

E. When a participant requests an emergency internal transfer, the program should take steps to immediately transfer the participant to a safe unit, if available. The transfer should receive at least the same priority as other transfer requests within the program. If a safe unit is not available immediately, program staff will notify the participant that a unit is not immediately available and explain the participant's options:
   1. Wait for a safe unit to become available for an internal transfer;
   2. Request an emergency external transfer; or
   3. Pursue both an internal and external transfer at the same time in order to transfer to the next available safe unit in the CoC.

F. Where the participant requests an external emergency transfer, top priority will be given over any other applicants for CoC-funded housing assistance, provided the household meets all eligibility required by HUD and the program. After the program notifies the CES team of the emergency transfer request, CES staff will facilitate a referral of the participant to the next available appropriate unit. The household retains their original homeless or chronically homeless status for purposes of the transfer.

G. Programs will ensure strict confidentiality measures are in place to prevent disclosure of the location of the client's new unit to a person who committed or

threatened to commit an act of domestic violence, dating violence, sexual assault, or stalking against the client.

H. The housing provider must keep a record of all emergency transfers requested, and the outcomes of such requests, and retain these records for a period of 5 years following the grant year of the program of which the household was a participant. Requests and outcomes of such requests will be reported to HUD annually.

I. Family Separation: Where a family receiving TBRA separates as part of the emergency transfer, the family member(s) receiving the emergency transfer will retain the TBRA assistance when possible. The program will work with CES staff and the household to support an effective transfer in situations where the program is not a good fit for the family member(s) receiving the emergency transfer.

VAWA Final Rule, 24 CFR, Part 5, Subpart L
24 CFR § 578.99

Sacramento Continuum of Care Non-Discrimination Requirements for CoC-Funded Programs Compliance Policy

Non-Discrimination: Sacramento Steps Forward does not tolerate discrimination on the basis of any protected class (including actual or perceived race, color, religion, national origin, sex, age, familial status, mental or physical disability, sexual orientation, gender identity, or marital status). Recipients and subrecipients must operate in compliance with federal, state, and local nondiscrimination and equal opportunity requirements including the Fair Housing Act, Title VI of the Civil Rights Act, the Age Discrimination Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act. Housing, services or other benefits shall be made available to all participants, and participants will not be "steered" toward any particular housing facility or neighborhood because of race, color, national origin, religion, sex, perceived sexual orientation, gender identity, marital status, mental or physical disability, or the presence of children. Some programs may be forced to limit enrollment based on requirements imposed by their funding sources and/or state or federal law. All such programs will avoid discrimination to the maximum extent allowed by their funding sources and their authorizing legislation.

Filing of Non-Discrimination Complaints: All locations where persons are likely to access or attempt to access housing and services provided by recipients and subrecipients will include signs or brochures displayed in prominent locations informing participants of their right to file a non-discrimination complaint and containing the contact information needed to file a non-discrimination complaint. The requirements associated with filing a nondiscrimination complaint, if any, will be included on the signs or brochures.

When a non-discrimination complaint is received, [Sacramento Steps Forward/ the Coordinated Entry Provider], in coordination with an ad hoc committee of the [CoC Advisory Board], will complete an investigation of the complaint within 60 days by attempting to contact and interview a reasonable number of persons who are likely to have relevant knowledge, and by attempting to collect any documents that are likely to be relevant to the investigation. Within 30 days after completing the investigation, [Sacramento Steps Forward/the Coordinated Entry Provider] will write an adequate report of the investigation's findings, including the investigator's opinion about whether inappropriate discrimination occurred and the action(s) recommended by the investigator to prevent discrimination from occurring in the future. If appropriate, the

investigator may recommend that the complainant be re-assessed or re-prioritized for housing or services. The report will be kept on file for two years.

Federal Citations:
24 CFR 578.93 (a)
24 CFR 5.105 (a)
24 § 576.500 (S) (1)