

# PERMANENT SUPPORTIVE HOUSING

[ written standards ]

# [ contents ]

## INTRODUCTION

- 4 Guiding Principles**
  - Prioritizing Chronically Homeless
  - Housing First
- 5 CoC Coordination with ESG**
  - Coordinated Entry System
  - Universal Assessment
  - Homeless Management Information System

## ELIGIBLE USES OF FUNDS

- 10 Acquisition**
- 10 Rehabilitation**
- 10 New Construction**
- 10 Operating Costs**
- 10 Supportive Services**
- 11 Leasing**
  - Other Eligible Costs
  - Occupancy Charges
  - Administration of Funds
- 12 Rental Assistance**
  - Tenant-Based Rental Assistance
  - Sponsor-Based Rental Assistance
  - Project-Based Rental Assistance
  - Other Eligible Costs
  - Participant Rent
  - Administration of Funds

## PROGRAM OVERVIEW

- 6 Target Population**
- 6 Core Program Components**
  - Permanent Housing
  - Supportive Services

## PROGRAM REQUIREMENTS

- 15 Rent Limits**
  - Rent Reasonableness
  - Fair Market Rent
- 15 Leasing & Occupancy Agreements**
  - Leasing Grants
  - Tenant-Based & Project-Based
  - Sponsor-Based
- 16 Housing Standards**
  - Housing Quality Standards
  - Suitable Dwelling Size
  - Lead-Based Paint
- 17 Environmental Review**
- 18 Program Income**
  - Security & Utility Deposits
- 18 Nondiscrimination & Reasonable Accommodation**
- 18 Retention After Extenuating Circumstances**
- 18 Emergency Transfer Plan for Victims of Domestic Violence**
- 19 Termination Policies**
- 20 Exits from PSH**

## COORDINATED ASSESSMENT & PRIORITIZATION

- 8 Coordinated Assessment**
  - Universal Assessment
  - Housing Navigation
  - Housing Match
- 8 Prioritization**
  - Order of Priority for PSH Vacancies
  - Order of Priority When No CH is Identified

## RECORDKEEPING REQUIREMENTS

- 21 Establishing Chronic Homeless Status**
  - Evidence of Homeless Status and Length/Frequency of Homelessness
  - Evidence of Disabling Condition
  - Evidence of Institutional Stay
- 23 Clients Transferring from RRH or PSH**
- 23 Bridge Housing & Maintaining CH Status**
- 24 Services Provided**
- 24 Participant Income**
  - Income Evaluation Form
  - Verification of Income
- 25 Records of Imminent Threat of Harm**
  - Original Incidence
  - Reasonable Belief of Imminent Threat of Further Harm

# [ appendices ]

**[ 25 ] Appendix A: Eligible Supportive Services**

**[ 30 ] Appendix B: Property Related Forms**

- 31 Rent Reasonableness Checklist & Certification
- 32 LA County Fair Market Rent Guidelines
- 33 CoC Housing Quality Standards Inspection Guidelines

**[ 34 ] Appendix C: Intake & Assessment Forms**

- 35 Certification of Chronic Homeless Status
- 36 Greater Los Angeles and Orange County Interagency Data Sharing Consent Form
- 37 Written Third Party Verification of Homeless Status
- 38 Observation of Homeless Status by Outreach Worker
- 39 Oral Third Party Verification of Homeless Status
- 40 Self-Declaration of Homeless Status
- 41 Certification of Disability
- 42 Written Third Party Verification of Income
- 43 Oral Third Party Verification of Income
- 44 Self-Declaration of Income

**[ 45 ] Appendix D: HQS Long Form**

**[ 65 ] Appendix E: HQS Short Form**

**[ 73 ] Appendix F: Environmental Review Chart**

# [ Introduction ]

In accordance with Title 24 of the Code of Federal Regulations (24 CFR) Part 578, the City of Pasadena (City) and the Pasadena Partnership to End Homelessness (Pasadena CoC) have developed the following written standards. In conjunction with 24 CFR Part 578 and the orders of priority established in Notice CPD-16-11, these standards will apply to all projects that receive Pasadena CoC Permanent Supportive Housing (PSH) funding and are intended as basic minimum standards to which grantees can make additions and more stringent standards applicable to their own projects. In addition, all projects must comply with the Notice of Funding Availability (NOFA) under which the project was originally awarded and, as applicable, the Consolidated Appropriations Act of 2014 and the Further Continuing Appropriations Act of 2015.

The goal of these standards is to synthesize key elements of the HUD regulations with the processes and priorities of the Pasadena CoC to ensure that the PSH program is administered fairly and methodically. The City and the Pasadena CoC will continue to build upon and refine this document.

## **GUIDING PRINCIPLES**

The Pasadena CoC is dedicated to HUD's goal of ending chronic homelessness. Research has consistently found that PSH using a Housing First approach is the most effective solution for people experiencing chronic homelessness. As such, the Pasadena CoC is firmly committed to prioritizing the chronically homeless for PSH and has embraced a Housing First approach for the CoC-PSH.

### **Prioritizing Chronically Homeless**

PSH is not a one-size-fits-all approach and should only be offered to those households that truly need that level of support. Thus, in order to use our limited resources in the most effective means possible, the Pasadena CoC is committed to prioritizing those most in need through an established order of priority. Within that order of priority, all CoC-PSH funded programs are required to fill vacant beds with chronically homeless individuals. In addition, PSH programs that do not receive CoC funding are strongly encouraged to prioritize the chronically homeless.

### **Housing First**

An immediate connection to PSH can ensure that over 80% of homeless individuals remain housed, even among clients with severe substance abuse and mental health conditions. Therefore, the Pasadena CoC has embraced a housing first approach for CoC-PSH to best serve this population.

Housing First is a simple philosophy that offers permanent, affordable housing as quickly as possible to homeless individuals and families. Once in a program, case managers work to engage participants in voluntary supportive services and connect them to community-based supports with the goals of helping them to remain in housing and avoid returns to homelessness. Income, sobriety, participation in treatment and/or other services, are not required as a condition for getting housing.

## **COC COORDINATION WITH ESG**

The Pasadena CoC utilizes the following approaches and procedures to ensure the coordination of resources among grantees:

### **Coordinated Entry System**

To minimize barriers to housing access and ensure timely placement, grantees are required to receive referrals through Pasadena's Coordinated Entry System (CES). The CES uses a no-wrong door approach in which homeless individuals who engage with any agency within the Pasadena CoC are entered into the system. This system ensures that every homeless individual is known by name, provides assistance based on individual's unique needs, and matches them to the right housing fit.

### **Universal Assessment**

All individuals will be assessed using a comprehensive, universal assessment tool called the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT). This tool guarantees that individuals' levels of need and eligibility determinations are made in an informed and objective manner.

### **Homeless Management Information System**

All grantees are required to participate in the Homeless Management Information System (HMIS) per the ESG and CoC Interim Rule (24 CFR 576 and 578). HMIS provides an opportunity to document homelessness and helps to ensure coordination between service providers while avoiding duplication of services and client data.

# [ Program Overview ]

## **TARGET POPULATION**

The eligible population for PSH is individuals with disabilities or families in which one adult or child has a disability. Based on HUD's recommendations, however, the Pasadena CoC has chosen to target chronically homeless individuals or families for CoC-funded PSH (see Exhibit 1 For definition).

## **CORE PROGRAM COMPONENTS**

The Pasadena CoC-PSH program provides permanent housing and support services to individuals and families with a disability, prioritizing those who are chronically homeless. The program is designed to reintegrate this highly vulnerable population into the community by addressing their basic needs for housing and providing ongoing support. There are two key components of the Pasadena CoC-PSH program: permanent housing and supportive services.

### **Permanent Housing**

Using a housing first approach, program participants are provided with rapid access to permanent housing with minimal preconditions. Good credit or rental history are not required to receive housing. Each household is placed in a unit that has access to meal preparation facilities or where grantees provide meals.

Tenants can remain in their homes as long as the basic requirements of tenancy are met—paying the rent (as applicable), not interfering with other tenants' use of their homes, not causing property damage, etc. This ensures participants have a private and secure place to make their home, just like other members of the community, and provides them with a stable foundation from which they can pursue their goals.

### **Supportive Services**

Once in housing, program participants have access to the support services that they need and want to live as independently as possible. Although PSH is designed for people who need supportive services, accepting these services is not a condition of housing. A person's home is a place to live rather than a treatment setting. As such, supportive services are voluntary, but can and should be used to persistently engage tenants and ensure housing stability.

Tenants receive assistance in defining their needs and preferences through annual assessments of service needs and individualized support plans that reflect those preferences. On-site residential supervision is provided as needed to facilitate the adequate provision of supportive services to the residents.

## Exhibit 1: Chronically Homeless Definition

### Who Can be Chronically Homeless

- 01** An individual who meets all three conditions of chronic homelessness (see below)
- 02** An individual who has been residing in an institutional care facility for fewer than 90 days (including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility) and met all three conditions of chronic homelessness before entering that facility
- 03** A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all three conditions of chronic homelessness (including a family whose composition has fluctuated while the head of household has been homeless)

### Three Conditions of Chronic Homelessness

#### Currently Homeless

Currently homeless and lives in one of the following:

- An emergency shelter
- A safe haven
- A place not meant for human habitation\*

Individuals residing in institutional care facilities <90 days who were homeless (as described above) immediately prior to entering that facility are considered homeless.

\*A place not meant for human habitation is defined as a place not designated for or ordinarily used as a regular sleeping accommodation for human beings, including car, park, abandoned building, bus/train station, airport, or camping ground. This does not include persons living in housing that is substandard and in need of repair or housing is crowded.

#### 12 Months Continuous or Cumulative Homelessness

Is currently homeless and has been either:

- Continuously homeless for at least 12 months; or
- Homeless on at least four (4) separate occasions in the last three (3) years, as long as the combined occasions equal at least twelve (12) months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living in an emergency shelter, safe haven, or place not meant for human habitation.

Stays in institutional care facilities for fewer than 90 days do not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility.

#### Disabling Condition

Can be diagnosed with one or more of the following disabilities which is of long, continued, and indefinite duration; substantially impedes the individual's ability to live independently; and could be improved by more suitable housing conditions:

- Substance use disorder
- Serious mental illness
- Developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002))
- Post-traumatic stress disorder
- Cognitive impairments resulting from brain injury
- Chronic physical illness or disability

# [ Coordinated Assessment & Prioritization ]

## COORDINATED ASSESSMENT

All Pasadena CoC-PSH providers are required to fill vacant beds through the region's Coordinated Entry System (CES) to ensure that the CoC's limited resources are being used in the most effective manner possible and that households most in need are being prioritized. The CES consists of three components: universal assessment, housing navigation, and housing match.

### Universal Assessment

The CES assesses the most vulnerable homeless residents within the Pasadena CoC using a universal assessment, the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT). The VI-SPDAT evaluates eligibility and provides an objective and comparable measure of vulnerability and service need.

### Housing Navigation

Once individuals have been assessed, those with the greatest needs (scores of 8+) are assigned a Housing Navigator to assist them in locating housing and support them in the collection of documentation (see Recordkeeping Requirements), ensuring they can be matched with PSH as quickly as possible.

### Housing Match

PSH providers submit vacancies to the CES when housing becomes available. The CES then matches the most vulnerable individual with that housing unit through a single prioritized waiting list that ranks individuals based on the CoC's designated order of priority (see below).

Housing providers agree to hold turnover beds open for a period of 15 days while the CES Community Matchers consult the existing prioritized waiting list (based on client prioritization guidelines below). If an individual or family who is chronically homeless cannot be found within the 15-day time period, the turnover bed may be filled with the agency's normal process.

## PRIORITIZATION

The Pasadena CoC has developed an order of priority to establish a uniform process for prioritizing placement into PSH through the CES. The over arching intent of this order of priority is to ensure that chronically homeless persons with the longest lengths of time homeless and the most severe service needs are prioritized over other eligible households (see Exhibit 2 for definition of Severity of Service Needs). It is important to note that the order of priority established below will be followed with consideration of agency goals and target populations

### Exhibit 2: Severity of Service Needs

For the purpose of this policy, persons who have been identified as having the most severe service needs have at least one of the following:

#### High Utilization of Crisis Services

History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or

#### Significant Health or Behavioral Challenges

Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing

#### Youth / Victims of DV

High risk of continued trauma or high risk of harm or exposure to very dangerous living situations

Severe service needs as defined above should be identified and verified through the CoC's Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT).



(e.g. mental illness). This order of priority may be revisited once the CES has fully automated referrals through HMIS, ensuring it accurately reflects the system’s methods of prioritization which will be based upon the orders of priority established by HUD in Notice CPD-16-011.

### Order of Priority for PSH Vacancies

All grantees receiving Pasadena CoC funding for PSH must fill vacant beds with chronically homeless persons. Exhibit 3 outlines the Pasadena CoC’s order of priority for filling PSH beds.

#### Exhibit 3: Order of Priority for PSH Vacancies

Order of Priority	Chronically Homeless	Severe Service Needs	Other Requirement
01	Yes	Yes	At least 12 months continuous or at least 12 months cumulative across 4 episodes in 3 years
02	Yes	Yes	Less than 12 months cumulative across 4 episodes in 3 years
03	Yes	No	At least 12 months continuous or at least 12 months cumulative across 4 episodes in 3 years
04	Yes	No	Less than 12 months cumulative across 4 episodes in 3 years
05	Yes	No	None

### Order Of Priority When No CH Is Identified

When no chronically homeless (CH) persons can be identified to fill a PSH vacancy, the CES will fill vacancies according to the priorities listed in Exhibit 4.

#### Exhibit 4: Order of Priority When No CH is Identified

Order of Priority	Disability	Severe Service Needs	Other Requirement
01	Yes	Yes	Long periods of episodic homelessness (fewer than four occasions but cumulative length of time 12 or more months)
02	Yes	Yes	Length of time homeless should be considered when prioritizing households but there is not a minimum length of time required
03	Yes	No	Currently residing in a place not meant for human habitation, a safe haven, or an emergency shelter. Length of time homeless should be considered when prioritizing households but there is not a minimum length of time required
04	Yes	No	Currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing

# [ Eligible Uses of Funds ]

Pasadena CoC-PSH grant funds may be used for acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services, as detailed below. Further detail can be found in 24 CFR Part 578, Subpart D.

## **ACQUISITION**

CoC-PSH funds may be used to pay for up to 100 percent of the cost of acquisition of property for the provision of PSH or supportive services.

## **REHABILITATION**

CoC-PSH funds may be used to pay up to 100 percent of the cost of the rehabilitation of structures to provide PSH or supportive services. Eligible rehabilitation costs include installing cost-effective energy measures and bringing an existing structure to State or local government health and safety standards.

## **NEW CONSTRUCTION**

CoC-PSH funds may be used to pay up to 100 percent of the cost of new construction and the cost of land associated with that construction, for use as housing. New construction includes either the building of a new structure or an addition that increases the floor area of an existing structure by 100 percent or more.

If funds are used for new construction, the costs must either be substantially less than the costs of rehabilitation or there must be a lack of available appropriate units that could be rehabilitated at a cost less than new construction. For purposes of cost comparison, costs of rehabilitation or new construction may include the cost of real property acquisition.

## **OPERATING COSTS**

CoC-PSH funds may be used to pay the costs of day-to-day operation of permanent housing in a single structure or individual housing units. Eligible costs include the maintenance and repair of housing; property taxes and insurance; scheduled payments to a reserve for replacement of major systems of the housing (provided that the payments must be based on the useful life of the system and expected replacement cost); building security for a structure where more than 50 percent of the units or area is paid for with grant funds; electricity, gas, and water; furniture; and equipment.

## **SUPPORTIVE SERVICES**

CoC-PSH funds may be used to pay for eligible costs of supportive services that address the needs of program participants and are necessary to assist them in obtaining and maintaining housing throughout the duration of their residence in the project. For participants who exit PSH, supportive services may only be provided if the resident was homeless in the prior six months (i.e. they were in the program less than six months). Eligible supportive services are detailed in Appendix A.

If the service is being directly delivered by the grantee, eligible costs for those services include the labor or supplies, and materials incurred by the grantee in directly providing support services to program participants and the salary and benefit packages of the grantee staff that directly delivers the services.

If the supportive services are provided in a facility that is separate from the housing structure, the costs of the day-to-day operation of the supportive service facility, including maintenance, repair, building security, furniture, utilities, and equipment are eligible as a supportive service. Staff training and the costs of obtaining professional licenses or certifications needed to provide support services are not eligible costs.

## LEASING

Leasing projects involve the leasing of property or portions of property (including single units) not owned by the recipient for use in providing PSH or supportive services. With leasing projects, the lease is between the grantee and the landowner while the occupancy agreement or sublease is between the grantee and program participant.

Leasing funds may be used to pay up to 100% of the costs of leasing a structure for up to three years. When electricity, gas, and water are included in the rent, these utilities may be paid from leasing funds. If the landlord does not provide utilities, these utility costs are an operating cost, except for supportive service facilities.

Leasing funds cannot be used to lease units or structures owned by the recipient, sub-recipient, or their parent, subsidiary, or affiliated organization. HUD has the authority, however, to grant an exception to the ownership clause for good cause.

### Other Eligible Costs

As summarized by Exhibit 5, recipients of leasing grants may also use funds to pay for security deposits, in an amount not to exceed 2 months of actual rent. An advance payment of the last month's rent may be provided to the landlord in addition to the security deposit and payment of the first month's rent.

### Occupancy Charges

For leasing awards, grantees are not required to impose occupancy charges on program participants as a condition of residing in the housing. However, if occupancy charges are imposed, grantees must treat all participants the same by having a clearly outlined process for determining the amount of charge that follows a specific calculation procedure to ensure participants are not overcharged. Occupancy charges may not exceed the highest of:

- 30% of the family's monthly adjusted income
- 10% of the family's monthly income
- The portion of welfare payments specifically designated by the public welfare agency to meet the family's housing costs

### Exhibit 5: Summary of Eligible Leasing Costs

#### Eligible Leasing Costs

CoC-PSH leasing funds can pay for:

- Leasing of property or portions of property for use in providing permanent housing
- Security deposits (up to 2 months' rent)
- First and/or last month's rent of an individual unit

In addition, grantees can require the program participants to pay for utilities. If the participant is required to pay utilities (excluding telephone) then a utility allowance must be factored into the rent calculation determination. Alternatively, grantees can use program operating funds or other sources to pay for the utilities.

### Administration of Funds

With leasing grants, recipients pay rent directly to the landowner. If required, participants pay their portion of the occupancy charge (i.e. rent) directly to the grant recipient.

## RENTAL ASSISTANCE

Rental assistance grants are differentiated from leasing grants in that these grants provide rental assistance to eligible persons for permanent housing. For rental assistance grants, the lease is between the program participant and the landowner or sub lessor. Grant funds may be used for permanent supportive housing rental assistance. The rental assistance may be tenant-based, project-based, or sponsor-based, as detailed below and summarized in Exhibit 6.

Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.

### Tenant-Based Rental Assistance

Tenant-based rental assistance (TBRA) allows people to choose their own housing unit from the private rental housing market. Participants receive vouchers, entitling them to a reduced rent, which can be used to rent a unit of their choice from a landlord who agrees to accept the voucher. TBRA helps to ensure that participant’s individual preferences and needs are met and that participants are fully integrated into the community.

For TBRA, the rent subsidy is portable, meaning that tenants who have complied with all program requirements retain the rental assistance if they move within the Continuum of Care geographic area. Although TBRA

**Exhibit 6: Types of Rental Assistance**

Tenant-Based	Sponsor-Based	Project-Based
<p><b>Rental assistance follows the program participant</b></p> <ul style="list-style-type: none"> <li>Participant locates housing of their choice</li> <li>If the participant moves, they can take the rental assistance to a new unit</li> </ul>	<p><b>Rental assistance stays with the sponsor/unit</b></p> <ul style="list-style-type: none"> <li>Grantee contracts with Sponsor who locates and rents housing units</li> <li>Sponsor then subleases the units to participants</li> <li>If the participant moves out of the unit, the sponsor can then sublease it to the next eligible participant</li> </ul>	<p><b>Rental assistance stays with the unit</b></p> <ul style="list-style-type: none"> <li>Grantee contracts with building owner</li> <li>Owner agrees to lease the subsidized unit to program participants</li> <li>If the participant moves out of the unit, the unit is rented to another eligible participant</li> </ul>

program participants have the ability to move and retain the rental assistance, grantees may limit where participants may live if it is necessary to facilitate the coordination of supportive services.

Program participants who have complied with all program requirements during their residence and who have been a victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believe they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking (which would include threats from a third party, such as a friend or family member of the perpetrator of the violence) may retain the rental assistance and move to a different Continuum of Care geographic area if they move out of the assisted unit to protect their health and safety and are able to document the violence and basis for their belief. See recordkeeping requirements to ensure proper documentation of imminent threat of harm.

### **Sponsor-Based Rental Assistance**

Sponsor-based rental assistance uses sponsor agencies to locate and rent housing units in the private market and then sublease these units to people who are homeless. Sponsors may be private, non-profit organizations or community mental health agencies established as a public non-profit organization.

In this model, a sponsor agency owns units or leases units and then subleases the unit to a program participant. Units that receive sponsor-based rental assistance can be owned or leased by the recipient, sub recipient, or private owner in the community.

If the program participant moves out of the unit, the sponsor can then sublease it to the next eligible participant. Or the sponsor can elect to continue SBRA to support the participant in his new unit, or the sponsor can locate another unit in the community and then sublet that unit to the same or a different eligible program participant. The decision is up to the sponsor because the rental assistance stays with the sponsor.

### **Project-Based Rental Assistance**

Project-based rental assistance (PBRA) is provided through a contract with the owner of a building who agrees to lease the subsidized units to program participants. With this model, the program participant does not retain rental assistance if they move. Rather, the unit would be rented to another eligible participant that would benefit from the PBRA.

### **Other Eligible Costs**

As summarized in Exhibit 7, in addition to paying the rent, grantees may use up to two months of rent to pay a security deposit to an owner. In addition, an advance payment of the first and last month's rent may be provided to the landlord.

Grantees may also use rental assistance funds to provide vacancy payments to landlords participating in the program if the unit is vacated before the end of the lease. In this situation, rental assistance may continue for a maximum of 30 days from the end of the month in which the unit is vacated unless occupied by another eligible person. This policy is intended to allow grantees time to engage another person who is homeless to move into the unit without losing the participation of the landlord.

Grantees can also cover up to one month's rent for property damages, but this is limited to one time per participant. Finally, staff time delivering rental assistance such as contracting for the units or inspecting the units, can be covered by rental assistance funds.

## Participant Rent

Grantees receiving rental assistance must require program participants to pay a portion of their rent in accordance with section 3(a)(1) of the U.S. Housing Act of 1937, unless they have no income at all. The program participant's rent contribution must be equal to the highest of:

- 30% of the family's monthly adjusted income (adjustment factors include allowances and deductions for disabled household members, member expenses, childcare expenses, etc.)
- 10% of the family's monthly gross income
- The portion of welfare payments specifically designated by the public welfare agency to meet the family's housing costs

If the participant is required to pay utilities (excluding telephone) then a utility allowance must be factored into the rent calculation determination.

## Administration of Funds

Program participants pay their portion of rent directly to the landlord. Either the grantee or the rental assistance administrator then pays the difference between the total rent and the amount paid by the program participant. Recipients can never cover the cost of the program participant's rent if the program participant fails to pay his or her portion of rent.

The Consolidated Appropriations Act of 2014 (Public Law 113-76, approved January 17, 2014) and the Consolidated and Further Continuing Appropriations Act of 2015 (Public Law 113-235, approved December 16, 2014) authorized nonprofit organizations to administer rental assistance to landlords in permanent housing funded with fiscal year (FY) 2012, FY 2013, FY 2014, or FY 2015. A rental assistance administrator must make rental assistance payments to the landlord for all other rental assistance grants.

Administering rental assistance in the CoC program is:

1. Contracting for and making rental assistance payments to the landlord/landowner; and
2. Conducting the HQS Inspections

The costs of administering rental assistance are considered service delivery costs of rental assistance and are eligible in the CoC Program as rental assistance costs.

## Exhibit 7: Summary of Eligible Rental Assistance Costs

### Eligible Rental Assistance Costs

CoC-PSH rental assistance funds can pay for:

- Unit rent
- First and/or last month's rent
- Security Deposits (up to 2 months' rent)
- Property damages (up to one month)
- Vacancy payments (up to 30 days)
- Staff costs carrying out eligible activities

# [ Program Requirements ]

## RENT LIMITS

HUD mandates specific rent requirements for all PSH rental assistance and leasing awards. As detailed below, both types of awards are subject to rent reasonableness standards. Additionally, leasing awards that provide assistance to participants for individual units are required to meet Fair Market Rent standards.

### Rent Reasonableness

Annual certification that rent complies with HUD's standard of rent reasonableness is required for both rental assistance and leasing awards (including structures and individual units). This means that the rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

**Form:** The Rent Reasonableness Checklist and Certification form in Appendix B may be used to ensure this guideline has been met.

### Fair Market Rent

Rents for individual units paid with CoC leasing grants may not exceed the Fair Market Rent (FMR). Recipients, however, may use other funds to pay rent amounts in excess of FMR. There is no FMR limitation for structures paid with CoC leasing grants.

With rental assistance grants, while awards are calculated based on Fair Market Rent amounts for the applicable unit sizes, a recipient is allowed to pay rents up to the rent reasonable amount even if it is higher than the FMR. If the recipient pays rent beyond FMR levels for some units in a project, they must ensure that they have sufficient funding—such as program participant rent contributions or lower rents in other areas of the community—to serve the contracted number of program participants for the remainder of the grant term.

All units that are required to meet FMR guidelines must be assessed at entry and annually thereafter.

**Form:** Los Angeles County Fair Market Rent Guidelines in Appendix B provides current FMR and guidelines for calculating rent.

## LEASING & OCCUPANCY AGREEMENTS

A key component in CoC leasing and rental assistance is leasing and occupancy agreements. All participants must have a signed agreement outlining the terms of their housing. Two individuals in a shared housing situation must have their own lease and their own bedroom unless the two individuals are presented together as a household. As pictured in Exhibit 8, the type of leasing arrangement depends on funding type.

### Leasing Grants

In projects that receive leasing funds, the recipient contracts for the space from a landowner, and therefore is primarily responsible for the housing or office space, if it's being contracted to provide supportive services. If the space is to be used for permanent housing, the grantee must execute an occupancy agreement with the program participant (i.e. tenant) to formalize his or her rights in the housing and to specify program expectations

regarding continued occupancy in the housing. The occupancy agreement must be for a term of at least one year and be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.

**Tenant-Based and Project-Based**

For tenant-based and project-based rental assistance, landowners have a contract with the grantee and a lease with the program participant (i.e. tenant). The lease agreement must be for a term of at least one year and be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.

**Sponsor-Based**

For sponsor-based rental assistance, grantees have a subrecipient agreement with the sponsor to administer the rental assistance on their behalf. Landowners then enter a contract with the sponsor and a lease with the program participant (i.e. tenant). The lease agreement must be for a term of at least one year and be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.

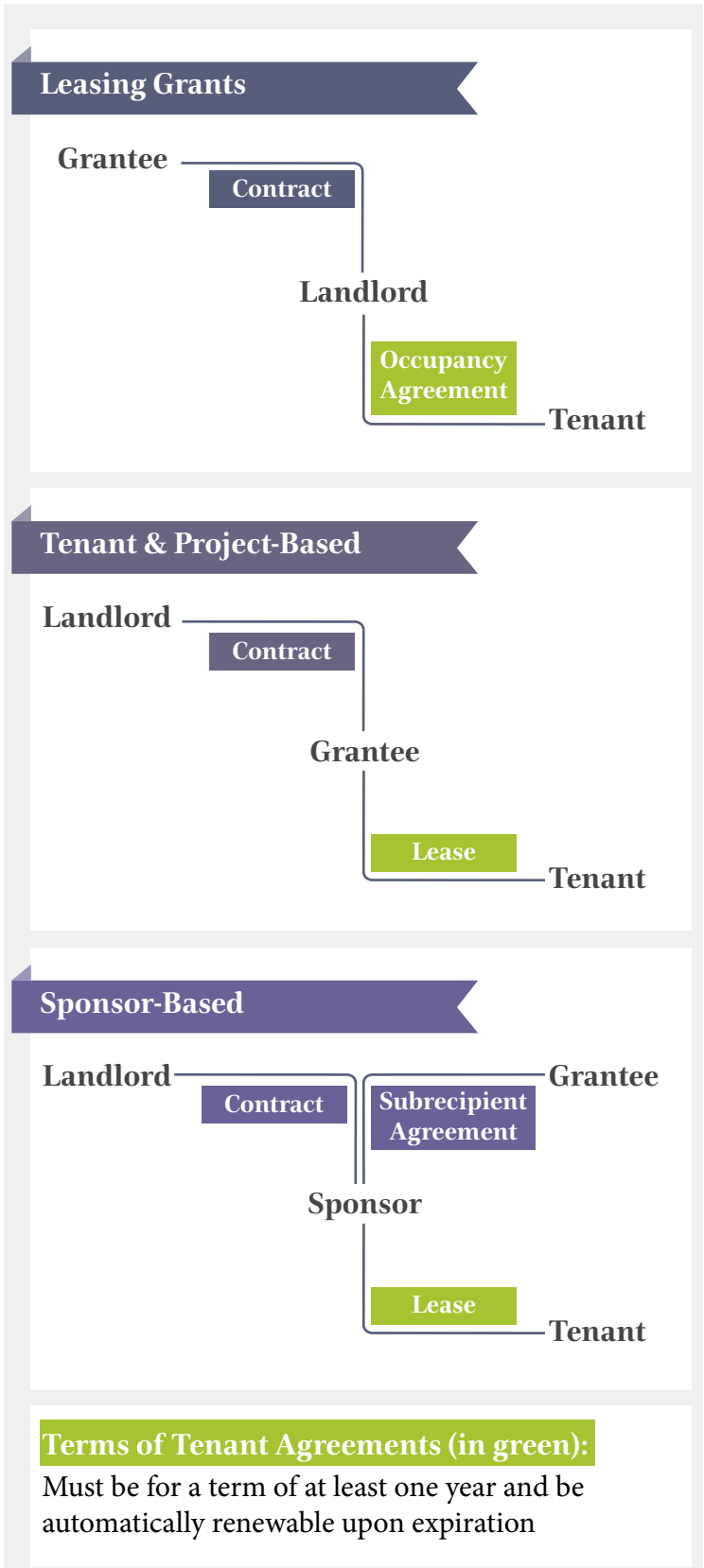
**HOUSING STANDARDS**

CoC-funded programs with housing programs occupied by program participants are subject to certain housing standards defined by HUD. These standards include Housing Quality Standards (HQS), Suitable Dwelling Unit Size standards, and lead-based paint requirements. Grantees must retain documentation of compliance with these housing standards, including HQS inspection reports.

**Housing Quality Standards**

All CoC-funded programs with housing programs occupied by program participants must meet the applicable HQS under 24 CFR 982.401 of this title, except that 24 CFR 982.401(j) only applies to

**Exhibit 8: Types of Leasing Arrangements**





program participants receiving TBRA. Before any assistance is provided, each unit must be physically inspected to assure that the unit meets HQS. In addition, grantees must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.

Assistance will not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the grantee verifies that all deficiencies have been corrected.

**Form:** The CoC Housing Quality Standards Inspection Guidelines form in Appendix B may be used to ensure this guideline has been met. Appendix D and F provide the accompanying HQS Long Form and HQS Short Form respectively.

### Suitable Dwelling Size

Each CoC-funded unit must have at least one bedroom or living/sleeping room for each two persons. Children of the opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room. If household composition changes during the term of assistance, grantees may relocate the household to a more appropriately sized unit. The household must still have access to appropriate supportive services.

### Lead-Based Paint

All CoC-funded programs with housing programs occupied by program participants are required to incorporate lead-based paint remediation and disclosure requirements. Generally, these provisions require the recipient to screen for, disclose the existence of, and take reasonable precautions regarding the presence of lead-based paint in leased or assisted units constructed prior to 1978.

- **Rehabilitation.** For housing rehabilitated with CoC-PSH funds, the lead-based paint requirements in 24 CFR part 35, subparts A, B, J, and R apply.
- **Rental Assistance.** For housing that receives project-based or sponsor-based rental assistance, 24 CFR part 35, subparts A, B, H, and R apply. Projects that receive tenant-based rental assistance are required to comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations at part 35, subparts A, B, M, and R apply.
- **Acquisition, Leasing, Services or Operating Costs.** For residential property for which CoC-PSH funds are used for acquisition, leasing, services, or operating costs, 24 CFR part 35, subparts A, B, K, and R apply.

## ENVIRONMENTAL REVIEW

Before any funds are committed, the City of Pasadena will conduct an environmental review of the grantee project site(s) to demonstrate there are no hazardous materials present that could affect the health and safety of the occupants. Environmental reviews will be conducted by the City of Pasadena and are acceptable for a 5-year time period. The costs of carrying out environmental review responsibilities are an eligible use of administrative funds.

**Form:** The Environmental Review Flowchart in Appendix B provides assistance in correctly identifying what level of environmental review is required for the CoC project.

## **PROGRAM INCOME**

HUD defines program income as the income received by the grantee directly generated by a grant-supported activity. For example, rents and occupancy charges collected from program participants are considered program income.

Program income earned during the grant term shall be retained by the recipient, added to funds committed to the project by HUD and the recipient, and used for eligible activities in accordance with the requirements of this part. Costs incident to the generation of program income may be deducted from gross income to calculate program income, provided the costs have not been charged to grant funds.

### **Security & Utility Deposits**

If a program participant leaves the program but remains in the unit for which the deposits were paid, the landlord will continue to hold the security deposit as provided in the lease, and/or the utility company will continue to hold any utility deposit as provided in the utility contract. State or local law and the terms of the lease and/or utility contract will dictate what the landlord and utility company may do with their respective deposits when the tenant leaves the unit and the utility contract terminates.

Programs need not require that security or utility deposits be returned to the program when the participant leaves the program, or when the lease or utility contract terminate. Any repayment of a security or utility deposit is considered program income and must be used as match in accordance with match regulations, and must be tracked in accordance with the recordkeeping requirements for match and program income.

## **NONDISCRIMINATION & REASONABLE ACCOMMODATION POLICY**

CoC-PSH programs must have written policies regarding nondiscrimination and reasonable accommodations/modifications. CoC Programs must operate in compliance with federal 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. Programs may not discriminate on the basis of actual or perceived sexual orientation, gender identity or marital status. For persons with disabilities, it is unlawful to: (1) fail to make reasonable accommodation in rules, policies, and services to give a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit and (2) fail to allow reasonable modification to the premises if the modification is necessary to allow full use of the premises.

## **RETENTION AFTER EXTENUATING CIRCUMSTANCES**

Surviving members of any household who were living in a unit assisted with CoC-PSH funds at the time of the qualifying member's death, long-term incarceration, or long-term institutionalization, have the right to rental assistance until the expiration of the lease in effect at the time of the qualifying member's death, long-term incarceration, or long-term institutionalization.

## **EMERGENCY TRANSFER PLAN FOR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT OR STALKING**

In accordance with the Violence Against Women Act (VAWA), tenants who are victims of domestic violence, dating violence, sexual assault, or stalking may request an emergency transfer from their current unit to another available unit regardless of sex, gender identity, or sexual orientation. All grantees are required to adopt the Model Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (HUD Form 5381), or an equivalent plan where all VAWA requirements are met. Grantees must provide each applicant with a Notice of Occupancy Rights under the

Violence Against Women Act (HUD Form 5380), which explains the VAWA protections and a Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternative Documentation (HUD Form 5382). The certification is an optional form that documents an incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking is eligible for an emergency transfer if the tenant has expressly requested the emergency transfer and reasonably believes there is a threat of imminent harm from further violence if he or she were to remain in the same unit. Alternatively, a tenant who is the victim of a sexual assault that occurred on the premises during the 90-day calendar period before the transfer is requested is also eligible for an emergency transfer. Grantees may use the optional Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking form (HUD Form 5383) to request an emergency transfer and certify that the requirements are met.

Grantees must keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives grantees 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.

Grantees must act as quickly as possible to move a tenant who is a victim of domestic violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If the grantee has no safe and available units for a tenant who needs an emergency transfer, the grantee will assist in identifying other safe and available units. Tenant transfers to a temporary safe housing location may be necessary for safety and may involve movement between housing types. Immediate placement with an emergency shelter motel voucher program will be used as a last resort and limited only to the time necessary to locate a safe and secure setting. Grantees are required to follow strict confidentiality standards and not disclose tenant information unless the tenant gives written permission of release or disclosure of the information is required by law.

## TERMINATION POLICIES

The grantee may terminate assistance to a program participant who violates program requirements or conditions of occupancy. Grantees that are providing PSH for hard-to-house populations of homeless persons must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases. Termination does not bar the grantee from providing further assistance at a later date to the same individual or family.

In terminating assistance to a program participant, the grantee must provide a formal process that recognizes the rights of the individual receiving assistance under the due process of law. This process, at a minimum, must consist of:

1. Providing the 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 reasons 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.

### **EXITS FROM PERMANENT SUPPORTIVE HOUSING**

The CoC requires all permanent housing providers to initiate a case conference with the CoC prior to exiting clients or in cases of warnings from landlords, eviction, notices to vacate, or termination. Case conferencing occurs monthly before the CES Team meetings. The case conferencing process includes the Case Manager as well as other CoC service providers who together help to ensure clients successfully exit to permanent housing and have a safety net upon exit, thus preventing any returns to homelessness.

To monitor the successful achievement of this goal, the City of Pasadena will run monthly reports from HMIS to ensure that programs are successfully exiting clients to permanent housing. The City will also monitor returns to homelessness on a monthly basis with notifications sent to Program Managers of any clients that have returned to homelessness to ensure these clients are re-engaged.

# [ Recordkeeping Requirements ]

All CoC-funded programs must establish and maintain policies and procedures for ensuring that CoC program funds are used in accordance with the recordkeeping requirements set forth in 24 CFR 578.103 and Notice CPD-16-11. This section provides an overview of those requirements and the Pasadena CoC's additional recordkeeping requirements.

## ESTABLISHING CHRONIC HOMELESS STATUS

To ensure each of the three conditions for chronic homeless status have been met (see Exhibit 1) and verified through the recordkeeping requirements detailed below, the Pasadena CoC has established a Certification of Chronic Homeless Status form. This form is intended to be used as a cover sheet for staff to certify chronic homeless status and must be completed prior to program entry (see Appendix C or [www.pasadenapartnership.org](http://www.pasadenapartnership.org)).

### Evidence of Homeless Status and Length/Frequency of Homelessness

HUD has established four options to document homeless status (and any breaks), as well as an order of priority for documentation. To document the length/frequency of the homeless status, the start and end date must be included in the documentation. To help ensure compliance with HUD's requirements, the Pasadena Partnership has developed a set of recordkeeping forms to document each of these methods of verification. Homeless Status Recordkeeping Forms, available in Appendix C as well as on the CoC's website, [www.pasadenapartnership.org](http://www.pasadenapartnership.org).

These four options for documenting homeless status are as follows (in order of priority):

1. **HMIS data.** To document a client's homeless status through HMIS data (or a comparable database used by victim service or legal service providers), a program may print an exit report or screen shot that indicates a client's homeless status as described above.

**Required Form:** Greater Los Angeles and Orange County Interagency Data Sharing Consent Form (to obtain individual client records)

2. **Third party referral.** Evidence of current living situation may also be documented by a written referral by a housing or service provider (such as emergency shelters, institutional care facilities, police officers, business owners, etc) that demonstrates the individual or head of household's homeless status. Institutional stays may also be documented through an oral third party verification or discharge paperwork that indicates the dates of stay.

**Required Forms:** Written Third Party Verification of Homeless Status or Oral Third Party Verification of Homeless Status (for institutional stays only).

3. **A written observation by an outreach worker.** Evidence of the current living situation may be documented by a written observation of an outreach worker.

**Required Form:** Observation of Homeless Status by Outreach Worker

**4. Self-declaration.** In addition, when a written observation by an outreach worker or third party referral is not available, three (3) of the (12) months, as well as all of the breaks, may be documented through a signed statement by the applicant verifying his or her homeless status. This self-declaration must include evidence of the efforts made to obtain third-party evidence as well as documentation of the severity of the situation in which the individual or head of household has been living.

**Required Form:** Self Declaration of Homeless Status

Please note that in the most rare and extreme cases, HUD would allow a certification from the individual or head of household seeking assistance in place of third-party documentation for up to the entire period of homelessness. HUD has set a maximum of 25 percent of chronically homeless individuals and families use self-declarations to document more than three (3) months of living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter.

Where third-party documentation could not be obtained, the intake worker must obtain a certification from the individual or head of household seeking assistance, and evidence of the efforts made to obtain third-party evidence (self-declaration of homeless status) as well as documentation of the severity of the situation in which the individual or head of household has been living. An example of where this might occur is where an individual has been homeless and living in a place not meant for human habitation in a secluded area for more than 1 year and has not had any contact with anyone during that entire period.

Finally, in establishing the duration of homelessness, a single encounter with a homeless service provider on a single day within one (1) month that is documented through third-party documentation is sufficient to consider an individual or family as homeless for the entire month unless there is any evidence that the household has and a break in homeless status during that month (e.g. evidence in HMIS of a stay in transitional housing).

### **Evidence of Disabling Condition**

In addition being homeless for an extended period of time, to be considered chronically homeless, an individual or head of household must be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in Section 103 of the Developmental Disabilities Assistance Bill of Rights Act of 2000, 42 U.S.C.15002), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability. Documentation of diagnosis must include one of the following:

**Written certification.** Written verification of the condition from a professional licensed by the State of California to diagnose and treat the condition.

**Required Form:** Certification of Disability

**Verification from SSA.** Written verification from the Social Security Administration.

**Disability check.** Copies of a disability check (e.g. Social Security Disability Insurance check or Veterans Disability Compensation)

**Written observation & written certification (45 days after).** Intake staff (or referral staff) observation that is confirmed by written verification of the condition from a professional licensed by the state to diagnose and treat the condition that is confirmed no later than 45 days after the application for assistance and accompanied with one of the types of evidence above.

**Required Forms:** Observation of Homeless Status & Certification of Disability

### Evidence of Institutional Stay

Individuals residing in an institution for less than 90 days (including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility) must provide evidence of homeless status, length/frequency of homelessness and disability (see above requirements) as well as documentation of their stay. Acceptable evidence includes either:

**Discharge paperwork or a written or oral referral.** Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution that demonstrates the person resided there for less than 90 days. All oral statements must be recorded by the intake worker.

**Required Forms:** Written Third Party Verification of Homeless Status or Oral Third Party Verification of Homeless Status documenting their stay in the institution and evidence of homeless status as described above.

**Certification from the person seeking assistance.** Where the evidence above is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in the paragraph above and a certification by the individual seeking assistance that states that they are exiting or have just exited an institution where they resided for less than 90 days.

**Required Form:** Self Declaration of Homeless Status documenting their stay in the institution and evidence of homeless status as described above.

### CLIENTS TRANSFERRING FROM RRH<sup>1</sup> OR PSH

For the purpose of transferring to a different CoC-PSH program, participants maintain their chronically homeless status during the time period that they are receiving rapid re-housing or permanent supportive housing assistance through other programs (so long as they met any other additional eligibility criteria for the new program prior to entering the original program). These additional permanent housing programs may include those funded by the Emergency Solutions Grants (ESG) Program, the CoC Program, the Supportive Services for Veterans Families (SSVF) Program, or the Veterans Homelessness Prevention Demonstration Program (VHPD).

Recordkeeping requirements for clients who transfer into a CoC-PSH from a rapid re-housing or PSH program includes the original chronic homeless documentation (prior to entering the original permanent housing), documentation of the reasons for the transfer, as well as documentation that it's the client's choice to switch programs.

### BRIDGE HOUSING & MAINTAINING CH STATUS<sup>2</sup>

The Pasadena Partnership understands that once a chronically homeless household has been determined eligible and accepted into a CoC-PSH program, a unit is not always immediately available. During this time, unless they have other options such as temporarily living with friends or family, the household will generally continue to reside in an emergency shelter or on the streets, prolonging their period of homelessness. Thus, after an individual or family has been accepted into a program but before an appropriate unit has been identified, a household may stay with a friend or family in a hotel or motel without losing their eligibility for a CoC-PSH program in which they have already been accepted. In

---

1. HUD Ask a Question Frequently Asked Question ID 530  
2. HUD Ask a Question Frequently Asked Question ID 1913

In addition, the individual or family member may be temporarily housed in an available transitional housing bed while a permanent housing unit is identified. This allowance is only permitted in the circumstances described below and only applies to persons that were considered chronically homeless prior to entry into the program:

1. **Housing First.** Since the program participant has been accepted into a CoC-PSH program, the transitional housing provider cannot place any requirements on the program participant, including requiring a program participant to participate in additional services as a condition of occupancy or requiring the program participant to meet sobriety requirements.
2. **Active Housing Search.** The CoC-PSH provider must be actively assisting the program participant to identify a unit as quickly as possible and must be able to document attempts at locating a unit in the case file. Under no circumstance, should the placement in transitional housing slow down placement into permanent housing. This means that placing a program participant into a permanent housing unit should not take any longer than the time it would normally take to place someone in permanent housing who is residing on the streets or in an emergency shelter.
3. **No Duplication of Services.** There cannot be duplication in billing for the program participant. For example, both programs cannot provide and then seek reimbursement from HUD for housing search or other services. The CoC-PSH provider and the transitional housing provider must coordinate to ensure that the appropriate services are provided and the same services are not being paid for out of both grants.

## SERVICES PROVIDED

CoC-PSH grantees are required to document and keep records of services provided in HMIS. In addition, grantees are required to document that client records were reviewed at least annually and that the service package offered was adjusted as necessary.

## PARTICIPANT INCOME

To determine the amount of contribution towards rent, grantees must examine a program participant's income at entry and annually thereafter (as applicable). If there is a change in family composition (e.g., birth of a child) or a decrease in the resident's income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly. To ensure proper evaluation of a participant's income, the grantee must keep the following documentation:

### Income Evaluation Form

Participants must complete an income evaluation form as specified by HUD to determine contribution towards rent.

### Verification of Income

In addition to completing an income evaluation form, participants must provide verification of income. The order of priority for verifying income is:

1. **Source Documents.** Source documents (e.g. most recent wage statement, unemployment compensation statement, public benefits statement, bank statement) for the assets held by the program participant and income received before the date of evaluation.
2. **Third-Party Verification.** To the extent that source documents are unobtainable, a written statement by



the relevant third party (e.g. employer, government benefits administrator) or the written certification by the grantee's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period.

**Forms:** Written Third Party Verification of Income or Oral Third Party Verification of Income

- 3. Written Certification by the Program Participant.** To the extent that source documents and third-party verification are unobtainable, the written certification by the program participant of the amount of income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

**Form:** Written Self Declaration of Income

## RECORDS OF IMMINENT THREAT OF HARM

For each program participant who moved to a difference CoC due to imminent threat of further domestic violence, dating violence, sexual assault, or stalking, grantees must retain documentation of the original incidence and documentation of reasonable belief of imminent threat of further harm.

### Original Incidence

Documentation of the original incidence of domestic violence, dating violence, sexual assault, or stalking, only if the original violence is not already documented in the program participant's case file. This may be any of the following:

- A written observation of the housing or service provider
- A letter or documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance
- Medical or dental records
- Court records or law enforcement records
- Written certification by the program participant to whom the violence occurred by the head of households

### Reasonable Belief of Imminent Threat of Further Harm

Documentation of the reasonable belief of imminent threat of further domestic violence, dating violence, or sexual assault or stalking, which would include threats from a third-party, such as a friend or family member of the perpetrator of the violence. This may be any of the following:

- A written observation by the housing or service provider, a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance
- Current restraining order
- Recent court order of the other court records
- Law enforcement reports or records
- Communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts
- A written certification by the program participant to whom the violence occurred or the head of household