

**Keweenaw Bay Indian Community (KBIC)
Niimigimiwang Office of Violence against Women (OVW)
Program for Housing Assistance and Safety Emergencies (PHASE)**

Policies & Procedures

Introduction

The KBIC OVW Program for Housing Assistance and Safety Emergencies (PHASE) administers funds earmarked for emergencies that have arisen for program participants due to domestic violence, sexual assault, dating violence or stalking. Funding is provided through the Department of Justice Office for Victims of Crime grant # 2014-VR-GX-K003.

The intent is to provide assistance to survivors participating in KBIC OVW outreach or shelter services.

PHASE can provide:

- Financial assistance for required up front rent, security deposits, utility deposits.
- Assistance with fixing a primary vehicle.
- Assistance with home safety needs such as locks or an emergency phone.
- Assistance with securing identification.
- Food or clothing for Niimigimiwang Transition House residents.

Limits on PHASE include:

- PHASE cannot provide assistance for outstanding bills.
- PHASE cannot fund a homeless situation that has not been the direct result of domestic or dating violence, sexual assault or stalking.
- PHASE will not fund an “intentional” crisis. Example: breaking a lease solely for the purpose of wanting to live elsewhere.

KBIC OVW staff can also provide the following services to supplement PHASE participant goals and safety:

- Assistance finding and maintaining permanent, safe housing.
- Assistance with transportation.
- Advocacy and support, including safety planning, budgeting, and case management.
- Crisis intervention and counseling.
- Vocational and employment assistance.
- Referrals to community resources and services.
- Follow-up services as needed or requested to support transition to permanent housing.

Eligibility Criteria

Participants must meet the minimum eligibility requirements to be considered for PHASE.

Determination of acceptance into PHASE will be made on a case by case basis, based on the following criteria and guidelines.

1. Applicant is a member of the Keweenaw Bay Indian Community, descendant of the Keweenaw Bay Indian Community, OR member of a Federally-recognized tribe; AND
2. The need for which the applicant is applying is a direct result of domestic violence, sexual assault, dating violence and/or stalking; AND
3. Applicant is at least eighteen years old or a legally emancipated minor; AND
4. Applicant is willing to work with KBIC OVW Staff on client driven goal(s) related to the request.
5. Applicant will discuss safety planning with the OVW Staff.

KBIC OVW PHASE staff recognize that applicants do not have control over the behavior of batterers or people associated with batterers. OVW staff strive to help each program participant maintain the safest life possible, and will not exclude participation or withhold assistance based on the behavior of a batterer.

PHASE Services

Request for Housing Support

1. Applicant must be fleeing a domestic violence situation or be in danger in current housing due to domestic or dating violence, stalking, or sexual assault, OR
2. Applicant meets one of the following conditions:
 - a. Is living in the home of another person because of economic hardship due to domestic violence, sexual assault, dating violence and/or stalking.
 - b. Lives in a hotel or motel due to fleeing domestic or dating violence, sexual assault, or stalking.
 - c. Is residing in a publicly funded institution, system of care, homeless shelter or domestic violence shelter due to domestic or dating violence, sexual assault or stalking and is preparing to exit.
 - d. Has moved in the past year due to domestic violence, dating violence, stalking, or sexual assault and is not able to maintain current living situation as a direct result.
3. The OVW Staff are able to use discretion to ensure that funds are being applied to housing which can be sustained, i.e. deposits are applied to a house whose rent fits the applicant's income.
4. When moving out, any security or utility deposits paid by KBIC OVW will be returned to KBIC OVW unless otherwise specified due to grant or program cessation.
5. If an applicant violates a lease due to a non-domestic violence situation for which PHASE funds were used, his or her future request for the same service may be denied.

Request for Vehicle Support

Vehicle repairs will only be approved for a participant's primary vehicle.

Repairs

1. Applicant must provide his/her driver's license, registration, and proof of insurance to access vehicle repair funding.
2. Repairs must be done by a licensed mechanic.
3. An estimate must be given before work is completed. PHASE funds will not be approved if the complete cost of the repair cannot be covered by the applicant, PHASE, and other funds.
4. OVW reserves the right to obtain a second estimate.

Assistance with Purchase

1. Applicant must have a valid driver's license.
2. Applicant must have cashier's checks or other funds earmarked to pay for registration and insurance.

3. Applicant must show he or she can sustain the cost of a new vehicle, including insurance.
4. Vehicle must be drivable. OVW reserves the right to deny payment for a vehicle that may not be immediately useable.
5. OVW reserves the right to have a mechanic assess the vehicle.

If an applicant sells, wrecks, or loses his or her right to a vehicle for which PHASE funds were used for purchase or repair, his or her request for the same service may be denied.

Request for Other Services

KBIC OVW will provide funds for the additional services listed below if the need for the service is directly due to domestic or dating violence, sexual assault, or stalking.

Safety Needs

PHASE can support security measures for a household such as dead bolts, changing locks due to a perpetrator having keys, or providing an emergency cell phone for a survivor at imminent risk.

Identification

PHASE can assist with the replacement of identification left behind when leaving a dangerous situation.

Food

PHASE can provide food in emergent situations when an individual enters the Niimigimiwang Transition House. If an entering participant does not have an income or receive food stamps, he or she must apply for food stamps or secure a source to obtain food.

Funding Availability

The Department of Justice Office for Victims of Crime is funding PHASE for fiscal years 2015 – 2017. (The fiscal year runs from October – September.) To ensure the PHASE program is available annually, the approximate PHASE allocation per year is listed below:

FY 2015 (October 1, 2014 – September 30, 2015)	\$36,525
FY 2016 (October 1, 2015 – September 30, 2016)	\$36,525
FY 2017 (October 1, 2016 – September 30, 2017)	\$36,525

The approximate funding amounts for each service include:

Housing security deposit	\$425
Housing required 1 st or last mo. rent	\$425
Utility deposits	\$325
New Household Items (bedding, dishes)	\$200
Mattress, crib, other necessary furniture	\$300
Car repair or purchase assistance	\$500
Security measures (locks, emergency phone)	\$100
Identification	\$60
Court/service fees for PPO/documents	\$50
Food (for Niimigimiwang Transition House)	\$200
Clothing/Personal Items (per person as needed)	\$150

Each applicant will have a unique situation and OVW will assist for the specific crisis issue that resulted from domestic or dating violence, sexual assault or stalking. OVW will not provide a “blanket approval” to an applicant for funding in all areas just because these areas can be funded. Funds are limited and will be applied only to crises that were a direct result of domestic or dating violence, sexual assault or stalking. The OVW may adjust the amounts within funded services based on each family’s specific crisis situation,

Application Process

1. Requests for PHASE can be made to any KBIC OVW Advocate or VOCA Worker. The Advocate can review a client’s application for completion, advise whether or not any additional information is needed, and forward to the OVW Team Lead. Applications for PHASE can also be dropped off at or mailed to the Keweenaw Bay Indian Community Office of Violence against Women at 16429 Beartown Road, Baraga, MI. 49908.
2. Once the completed application is submitted it will be reviewed by the KBIC OVW Team Lead for approval (or a designee if the Team Lead is unavailable or applicant is related to the Team Lead). If any additional information is needed to make the determination of eligibility, the applicant will be contacted (in the manner designated by applicant on the application) to obtain this information.
3. Upon receipt of completed application, a decision will be made within 3 business days. OVW will contact the applicant in the manner designated by applicant on the application with the decision.
4. If applicant is eligible, an appointment will be set up with an OVW staff member to discuss the next steps in the process and set goals to meet the applicant’s needs.
5. OVW PHASE staff reserve the right to adjust the amount of funding approved based on vendor costs.
6. OVW PHASE staff may coordinate funding with other programs as requested by the applicant.
7. Applicant can request a copy of his or her application with approval/denial.
8. Applicant has 10 business days to appeal a PHASE decision to the KBIC Women’s Advisory Board.

Reasons for a PHASE application denial may include:

- Applicant is not a member of a federally recognized tribe or a descendant of Keweenaw Bay Indian Community.
- Requested service is not a direct result of domestic or dating violence, sexual assault or stalking.
- False information was given on the application or in the interview with OVW staff when assessing eligibility.
- Applicant is requesting a service for which he or she already received OVW PHASE funding.
- In the case of housing or vehicle request, there is evidence that the applicant will not be able to sustain the requested house or vehicle within his or her current budget.
- In the case of a vehicle request, applicant does not have the ability to legally drive and/or maintain the vehicle.

Appeal Process

If a PHASE applicant believes he or she has been denied a PHASE service without good cause or based on erroneous information, the applicant may appeal the decision. Appeals will be heard by a

minimum of three members of the KBIC Women's Advisory Board who are not related to the applicant and/or do not work within the OVW Programs & Services or VOCA. Members of the Women's Advisory Board are also bound by confidentiality and each member has signed the KBIC OVW Confidentiality form.

Participation in the OVW program is confidential, and a participant's information is not disclosed to the Women's Advisory Board without the participant's written consent. To proceed with an appeal to a PHASE denial, the applicant must sign a release of information to allow the OVW staff to address the appeal with the Women's Advisory Board.

Steps to the appeal process are presented as follows:

1. Applicant may file an appeal to a PHASE denial within 10 business days from receiving the denial.
2. The applicant can request the appeal form from any OVW staff member. The form will have an OVW Release of Information attached. This release will allow OVW administration to release the application to the Board and to discuss only the reasons for the denial of the PHASE application. Other issues or concerns that have arisen during any intervention that are not pertinent to the denial for PHASE services cannot be discussed. The applicant may sign and leave the release with the OVW upon receipt of the appeal form or return the release when returning the appeal form.
3. The applicant may turn in the appeal request to the OVW Team Lead or designee. The appeal can be hand delivered or mailed to: Keweenaw Bay Indian Community Office of Violence against Women, Team Lead or Designee, 16429 Beartown Rd., Baraga, MI. 49908. If the applicant did not turn in a release of information yet, he or she can return the Release of Information with the appeal form. Please note: If applicant does not fill out a Release of Information to allow OVW staff to address the appeal, the Advisory Board will be unable to proceed with the appeal.
4. The Team Lead or designee will schedule an appeal meeting within five days and will ensure all pertinent parties are available. The applicant may address the Women's Advisory Board in person at the appeal meeting.
5. The decision of the Women's Advisory Board is final.

Confidentiality

All KBIC OVW Programs and Services are bound by confidentiality under the Violence Against Women Reauthorization Act (VAWA) of 2013. A participant's information can only be released in the following instances:

- The participant has signed a time-limited consent to disclose specified information to an identified source.
- The U.S. Department of Justice, as the program funder, has the right to audit the KBIC OVW Programs and Services. Non-identifying information for statistical program purposes is also required by the U.S. Department of Justice.
- Pursuant to a court order or statutory mandate but only after reasonable attempts to provide notice of the disclosure to the participant and taking steps to safeguard the privacy and personal safety of the individual(s) affected by the release.
- If the participant is a danger to self or others.

KBIC OVW cannot release any information about a program participant without consent, including the verification that a participant is utilizing an OVW program. By the nature of PHASE, participant information necessary to make a deposit or payment to a vendor will be disclosed. Participants must

sign a release of information for each vendor receiving funds from PHASE as the receipt of such funds verifies that the participant is receiving OVW services. The release will specify only information necessary to process a payment.

If a participant in PHASE requests the KBIC OVW to coordinate services with another program or an individual, the participant must provide signed consent to do so.

The KBIC OVW utilizes the KBIC Accounting Department to generate checks for PHASE. The PHASE participant's OVW client number will be the only identifying information on paperwork sent to and generated by the KBIC Accounting Department.

Accounting

- 1.** The disbursement of funds from PHASE will be paid directly to vendors, utility companies, landlords, mechanics, programs, etc. At no time will PHASE funds be paid directly to a participant.
- 2.** Checks are processed through KBIC Accounting using the KBIC-OVW participant number. The following procedures will be followed:
 - a.** A release of information will be obtained from the OVW participant for the vendor to which funds will be allocated.
 - b.** KBIC OVW staff will submit a purchase request to KBIC accounting. The purchase request is for a check payable to the vendor and will include the participant's OVW participant number. Participant names on any additional paperwork will be blacked out, and the OVW number will be used for identification purposes. The purchase request will include instructions for KBIC Accounting to return the check to the OVW program.
 - c.** The KBIC OVW program will then forward the check to the vendor with participant identifying information. Only identifying information necessary for check processing will be provided.

Questions or comments about the KBIC OVW PHASE can be directed to KBIC OVW Administrative Staff at (906) 353-4598.