

Arizona
Continuum of Care Program &
Emergency Solutions Grant Program

Statewide Gender-Based Violence Policy

Adopted by the Maricopa Regional Continuum of Care Board June 22, 2026

Overview

This Gender-Based Violence Policy (“Policy”) defines the ways in which Arizona’s Continuums of Care (CoCs), Emergency Solutions Grant (ESG) recipients, and housing providers under the CoC and ESG Programs (“Partners”) ensure that:

- Survivors of gender-based violence who apply for assistance are provided with equitable access to CoC and ESG resources
- Survivors of gender-based violence who receive assistance are assisted in maintaining and, when necessary, reestablishing safety in emergency shelter and subsidized housing
- CoC Program-funded organizations comply with all CoC Program requirements related to people fleeing or attempting to flee domestic violence, dating violence, sexual assault, and stalking

Specific protections afforded to CoC Program applicants and participants include:

- Prohibitions against discrimination on the basis of domestic violence, dating violence, sexual assault, and stalking
- Access to lease bifurcation (i.e. separating a participant household such that a tenant who is a victim can remain within a subsidized housing unit while the abuser is removed from the unit and household)
- Emergency transfer (i.e. enabling a tenant who is a victim to move from their existing subsidized housing unit to a new, safe housing unit, which can include separating a participant household such that the abuser is removed from the household and may potentially remain in the original unit)
- Confidentiality protections to ensure that critical information about survivors is not improperly disclosed

This Policy has been adopted by the following CoCs and is effective for all CoC Program projects funded via those CoCs:

Program	Jurisdiction	Contact Organization	Contact Information
Continuum of Care	Maricopa County	Maricopa Association of Governments Community Initiatives Division	hsinfo@azmag.gov
Continuum of Care	Pima County	Tucson Pima Collaboration to end Homelessness	tpch@tucsonaz.gov
Continuum of Care	Arizona Balance of State Continuum of Care	Arizona Department of Housing	david.bridge@azhousing.gov

Emergency Solutions Grant	State of Arizona	Arizona Department of Economic Security	jzimmerman@azdes.gov
Emergency Solutions Grant	Glendale	Glendale Community Services Department Human Services Grants Division	tdileo@glendaleaz.com mhess@glendaleaz.com
Emergency Solutions Grant	Mesa	Mesa City Housing and Community Development	michele.payakovich@mesaaz.gov justin.boyd@mesaaz.gov aeaton@mesaaz.gov
Emergency Solutions Grant	Phoenix	City of Phoenix Neighborhood Services Department	rachel.milne@phoenix.gov margaret.adams@phoenix.gov
Emergency Solutions Grant	Tucson	City of Tucson Housing and Community Development Department	noemi.santana@tucsonaz.gov Andrew.parades@tucsonaz.gov Cat.polston@tucsonaz.gov
Emergency Solutions Grant	Maricopa County	Maricopa County Human Services Department	chela.schuster@maricopa.gov tamara.bridwell@maricopa.gov
Emergency Solutions Grant	Pima County	Pima County Homeless Services Division	judith.herrera@pima.gov jenifer.darland@pima.gov daniel.sullivan@pima.gov
Emergency Solutions Grant	Pinal County	Pinal County Government	heather.patel@pinal.gov

Access

Each Partner must ensure that people fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking have equitable access to the Partner's resources, including via the local coordinated entry system to the extent those resources are accessed via coordinated entry.

"Equitable access" means the following:

- **Non-Discrimination:** applicants for assistance and tenants in CoC-funded housing cannot be denied admission to, denied assistance under, terminated from participation in, or evicted from housing, shelter, or the local coordinated entry process on the basis or as a direct result of the fact that the applicant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if they would otherwise qualify for admission, assistance, or participation.

- **VSP Participant Access:** applicants and participants whose data is maintained in a Homeless Management Information System (HMIS)-comparable database (“VSP participants”) must have access to resources at the same rate and pace as applicants and participants whose data is maintained in the CoC’s HMIS; at minimum, this means:
 - VSP participants’ rates of access to ESG-funded emergency shelter cannot be significantly lower
 - VSP participants’ length of time (LOT) homelessness cannot be significantly higher
 - VSP participants’ rates of referral to CoC Program- or ESG-funded housing cannot be significantly lower
 - VSP participants’ rates of successful intake to CoC Program- or ESG-funded housing cannot be significantly lower
- **Paperwork Burden:** VSP participants cannot be asked or required to fill out significantly more documents and forms than other participants to receive access to resources except insofar as those documents or forms are necessary to meet a funder’s requirements.

Each CoC must ensure its coordinated entry access points incorporate safety planning into their intake and assessment processes. At minimum, this means that, at applicant intake and periodically thereafter until the applicant exits the coordinated entry system, the access point serving the applicant must assess whether the applicant is fleeing, attempting to flee, or otherwise under threat of harm from gender-based violence, which includes but is not limited to domestic violence, dating violence, sexual assault or stalking. Access points must offer applicants who meet one or more of those criteria connections with appropriate gender-based violence resources, which may include but are not limited to VSP-operated emergency shelters.

Each CoC must ensure its coordinated entry system incorporates gender-based violence safety needs into its assessment process. This Policy recommends that safety needs be incorporated into both the CoC’s quantitative assessment tool and its qualitative assessment process (e.g. case conferencing). Each CoC must ensure any coordinated entry case conferencing process offers equitable access to VSP participants.

Notification

Notification of Rights and Certification of Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Alternate Documentation

Each applicant to and participant in transitional and permanent housing funded by the CoC Program or ESG Program must receive Form HUD-5380 (“Housing Rights for Victims”) and Form HUD-5382 (“Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking”) at each of the following times:

- When an individual or family is denied transitional housing or permanent housing;
- When a participant is admitted to permanent housing or transitional housing;
- When a participant receives notification of eviction; and
- When a participant is notified of termination of assistance.

The organization administering the participant's transitional or permanent housing is responsible for providing at the specified time the Housing Rights for Victims and VAWA Certification HUD 5380 and 5382 forms that can be found at www.hud.gov/VAWA. That organization must collect a signed certification from each participant attesting that they received the Notice of Rights and VAWA Certification at those times.

Notification of Eviction

This section applies to tenants who are living in housing subsidized via the CoC Program Rental Assistance Budget Line Item (BLI) or ESG Program rental assistance.

The organization administering the participant's rental assistance must ensure that the owner or manager of the housing provides the Housing Rights for Victims form along with any notification of eviction. This commitment and the confidentiality requirements under 24 CFR 5.2007(c) must be set forth in a contract between the CoC Program- or ESG-funded organization and the owner of the housing.

Contract, Lease, and Occupancy Agreements

CoC-funded programs must include language in agreements with housing owners or landlords detailing VAWA protections, including notification, prohibited bases for eviction, limitations, and other requirements. For specific requirements, see 24 CFR 578.99(j)(5).

For leases for tenant-based rental assistance existing prior to December 16, 2016, recipients and subrecipients must enter into a contract as specified by 24 CFR 578.99(j)(5) before the next renewal of the lease.

The leases, subleases, and occupancy agreements of all participants receiving CoC and ESG assistance must include a provision that includes all requirements that apply to tenants, the owner or the lease under 24 CFR part 5, subpart L. The lease specifies that the protections under 24 CFR part 5, subpart L, only apply while the program participant is receiving tenant-based rental assistance under the CoC Program. This provision may be an independent addendum or incorporated elsewhere in the lease, but it must be in the lease. This requirement is triggered by receipt of CoC- or ESG-funded leasing and rental assistance.

When participants are receiving assistance other than tenant-based rental assistance, their lease, sublease, or occupancy agreement must allow for the participant to terminate the agreement without penalty if they invoke their emergency transfer protections. When participants are receiving tenant-based rental assistance, the recipient or subrecipient must also enter a contract with the owner or landlord that requires the owner or landlord to comply with all protections provided by 24 CFR part 5, subpart L, including lease addendum requirements and the right to terminate the lease without penalty if the participant invokes emergency transfer protections.

It is required that all leases incorporate all requirements under 24 CFR Part 5, subpart L, at initial lease-up and at lease renewal. Leases must be executed with all applicable requirements met in advance of payment.

Marketing

Marketing Plan

Arizona CoC and ESG leadership have developed a participant marketing plan that ensures tenants are adequately informed about the emergency transfer plan. Specifically, participants will, at minimum, understand:

- What the emergency transfer plan offers
- Which situations would qualify them for an emergency transfer
- How to request an emergency transfer, including that the request may be made in writing or verbally

This plan includes multiple elements that are designed specifically for tenants, including simplified one-page information sheets included with tenant move-in packets, flyers posted at housing providers and other sites.

Public Posting

Each Partner must make Form HUD-5380, Form HUD-5382, and the Emergency Transfer Plan publicly available to the extent feasible, which must, at minimum, include:

- Linking or posting documents on the Partner's public-facing website
- Posting key information about these documents in publicly accessible CoC- or ESG-funded spaces, such as emergency shelters, drop-in centers, and the lobbies of housing assistance providers

Assessment and Continuous Quality Improvement

Arizona CoC and ESG leadership have implemented a continuous quality feedback process to review the ETP, measure the impact of these policies, and provide a mechanism for continuous improvement. Should the continuous quality feedback process lead to policy or process amendments, Arizona CoC and ESG leadership shall ensure that there is sufficient training for providers, information disseminated to program participants and updated lease amendments for leases that take effect after the ETP is revised.

On an annual basis, each CoC will conduct a review to assess whether it meets the requirements and standards in this Policy. This review may be conducted at either the statewide or CoC level, as determined necessary. The review must, at minimum, incorporate feedback from:

- The CoC's coordinated entry governing body
- The CoC's HMIS governing body
- The CoC's gender-based violence governing body (if one exists)
- The CoC's lived experience advisory or governance body (if one exists)
- At least one victim services provider (VSP) funded by the CoC (if one exists)
- The Arizona Coalition to End Sexual and Domestic Violence (ACESDV)

The results of this process must be reviewed by the CoC's primary governing entity. This review must either:

- Certify that the CoC meets the requirements and standards in this Policy; or
- Direct the CoC's governing bodies, funded organizations, and other entities to take specific actions intended to move the CoC's activities toward compliance with this Policy

Confidentiality Protections

All existing CoC, HMIS and CE privacy and confidentiality policies apply to survivor data and to this policy. Confidential Information shall neither be entered into any shared database, including but not limited to a CoC's designated Homeless Management Information System (HMIS), nor disclosed to any other entity or individual, except if:

- Requested or consented to in writing by the victim in a time-limited release of information; OR
 - o Informed consent may be revoked by participant at any time. Providers will implement any revocation immediately by securing or removing any shared data. This includes any data retroactive to the revocation.
 - o Sharing may not exceed or be used for any purpose other than those explicitly authorized by the survivor/participant.
 - o Declining to authorize a consent will not affect eligibility for services or assistance
- Otherwise required by applicable law. If required by law:
 - o The participant will be notified unless prohibited by law
 - o Disclosure will be limited to minimum information necessary
 - o The disclosure and reason will be included in case record.

In addition, HUD's VAWA regulations require ETP to provide strict confidentiality measures to ensure that the location of a victim's dwelling unit is never disclosed to a person who committed or threatened to commit the VAWA violence/abuse. Please refer to the Emergency Transfer Plan for confidentiality and disclosure requirements.

Comparable Database

VSPs may use comparable databases in lieu of the CoC HMIS. All HMIS collection confidentiality, privacy and security standards apply to comparable data base.

Comparable database information may be required to be shared with HMIS, CE or the Continuum of Care for purposes of funding or coordination. All shared information will be de-identified and will follow the HMIS policies around privacy and confidentiality.