

# RELOCATION

## CORE STANDARD

Relocation is facilitating or providing direct assistance in helping victims and their families, due to their status of being a victim or victim-witness to a crime, temporarily or permanently relocate to a new residence out of necessity for their safety and well-being due to real or potential intimidation, harassment or harm.

Assistance may include, but is not limited to, hotel and Air B&B fees, transportation to a safe location, reasonable moving expenses, reasonable purchase of furniture, security deposits on housing, rental expenses, storage unit rental, P.O. Box fees, and utility startup costs. Mortgage expenses are ineligible under VOCA. The maximum reimbursement for relocation expenses is \$5,000. Exceptions to the relocation funding cap will be considered on a case-by-case basis. Approval of requests to exceed the funding cap will be determined by the Office of the Attorney General Grants Unit.

## PROGRAM REQUIREMENTS

For the VOCA-funded agency that provides relocation, the following requirements apply:

1. In providing for the relocation of a victim and their family, the Victim Service Provider (VSP) shall, at a minimum, include the following in their written policies:
  - a. A detailed description of whom is eligible for relocation services, including provisions for caretakers and/or dependents where appropriate.
  - b. A detailed application, intake and risk assessment process. The assessment should include, at a minimum:
    - i. A statement of the victim's exigent need for relocation services and financial assistance for relocation;
    - ii. Other sources of relocation funding to prevent duplication of assistance/reimbursement.
  - c. A detailed outline of the relocation process, which shall take into consideration all of the steps and costs involved in the relocation, such as: short and long-term housing; transportation; security deposits; rental expenses; assistance with school and housing voucher transfers; the moving of children and other household members; moving expenses; pets; utility costs; subsistence; and any other items related to the relocation process. VSPs are encouraged to consider the cost-of-living in their areas when developing budget limits. VSPs should also include plans and funding for returning victim-witnesses to testify as required.
  - d. The scope and length of services, including termination procedures.
  - e. Communication procedures between the client, VSP, third-party vendors, and law enforcement, if necessary, including confidentiality considerations.
  - f. Security and liability considerations, which include a detailed Safety Plan, if necessary.
  - g. Any other policies or procedures deemed necessary by the VSP to ensure the safety and security of the relocated victim and their family.

If a determination is made that relocation is not required, or the relocation services are terminated, the VSP may provide the eligible victim with other housing options (i.e., Emergency Financial Assistance, Emergency Shelter, Emergency Housing, Transitional Housing, or In-Home Care) and other eligible direct services, such as, but not limited to, personal advocacy, counseling, safety planning, civil legal services and transportation.

2. The VSP shall develop and document an individualized relocation plan meeting the needs of the victim and their family. The VSP shall document, in writing, the victim's agreement with the relocation plan and all related VSP policies and procedures.
3. If the VSP is partnering with law enforcement in the relocation of a victim-witness, the VSP shall establish an interagency agreement or memorandum of understanding with the appropriate law enforcement department to ensure that all parties are aware of the policies, procedures, and responsibilities that each entity has agreed to follow in regards to the relocation process.
4. Federal VOCA funding cannot be used to supplant existing state or local funding commitments for relocation. Funding can be used, however, to supplement existing funds for new or expanded services.
5. VSPs that utilize funding through the Office of the Attorney General, victims' compensation for relocation services must follow the respective requirements of those funding streams.
  - a. In the event that a security deposit is paid in connection with a relocation, the landlord or leasing company must be advised that the return of the deposit on termination of the contract or lease is required.
  - b. The net amount of the security deposit, less any charges expended in accordance with the terms of the contract or lease, shall be returned to the Office of the Attorney General Grant Unit.
6. Participation in relocation must be voluntary. Relocation that is court-ordered is not eligible for VOCA funding and must be provided by the appropriate county office independently.
7. **Conflict of Interest** – VOCA Relocation funding may not be used in payment to any vendor of relocation goods or services if said vendor has a personal or professional affiliation with any member of the Board or staff of the VOCA subrecipient program.
  - a. Personal or professional affiliation includes:
    - i. A material economic relationship between the vendor and a Board member or staff member.
    - ii. A material economic relationship between the vendor and a Board/staff member's partner parent, sibling, child or member of the immediate household.
  - b. Members of the Board of Directors and staff have an affirmative duty to disclose all personal or professional affiliations with a proposed vendor of relocation

services and the subrecipient must consider all material facts and avoid even the appearance of impropriety and avoid entering contractual relationships with said proposed vendor(s).

### **ADMINISTRATION**

1. Each request for relocation services shall receive a separate review for consideration and approval. For each victim and their family, the VSP shall document the statement of the victim's exigent need, the intake assessment, the individualized relocation plan, and all signed agreements.
2. VSPs must have a written policy and established procedures on the management, approval, and distribution of relocation funds. In addition, VSPs must maintain a thorough record of all activities related to the administration of relocation funds that reflects their written policy and procedures. At a minimum, records must include documentation of eligibility, distribution of funds, payee and amounts, dates of transactions, approving authorities and any other information deemed applicable by the VSP's written policy.
3. VSPs administering relocation services must establish a system of checks and balances and ensure segregation of associated duties. Formal internal controls for the approval and distribution of funds that includes two-person accountability must be outlined in their written policies and procedures governing relocation.
4. Awards for relocation services shall be paid directly toward the financial obligation on behalf of the victim when at all possible (e.g., rent, utilities, etc.). When direct payment to a vendor is not possible or practical, payment may be made to the client with sufficient justification noted.

### **MONITORING & REPORTING REQUIREMENTS**

1. OAG will monitor VSPs on the administration of relocation services. OAG staff will review program policies and procedures, financial transactions and all records related to the relocation of victims and their families.
2. Regular reporting on relocation expenses will be required as part of the quarterly fiscal reporting processes. VSPs are encouraged to develop or utilize tracking systems to monitor expenses for relocation services.
3. VSPs should be aware that the misuse of funds is strictly prohibited. VSPs identified for the misuse of funds through regular monitoring and audits will be held responsible for full reimbursement of the misappropriated funds.

### **STRIVING FOR EXCELLENCE**

- VSPs are encouraged to enter into interagency agreements or MOUs with all relevant local service providers to develop a comprehensive range of housing options for victims.

- VSPs are encouraged to invite law enforcement and other partners in relocation services (e.g., hotels, transitional housing service providers, property managers, legal service providers, mental health counselors, etc.) to attend trauma-informed training sessions and to inform them on emerging trends and responses to victimization.