

# Emergency Transfer Policies and Procedures for CoC Project Participants

Bristol County Continuum of Care  
Revisions Adopted on December 18.2025



The MA-505 Bristol County Continuum of Care (CoC,) is concerned about the safety and well-being of all persons accessing or receiving Permanent Supportive Housing (PSH) funded under the U.S. Department of Housing and Urban Development (HUD) through its CoC Program. The CoC Program necessitates certain conditions be met to permit the transfer of PSH project participants from one project to another. This concern extends to project participants in CoC funded housing who are victims of domestic violence, dating violence, sexual assault, and/or stalking in need of safe emergency transfer to new housing as well as those experiencing extraordinary conditions further defined here necessitating an accommodation for a transfer from an existing CoC PSH unit to another CoC PSH unit.

The following focuses first on the policies and procedures attendant to CoC PSH emergency transfers arising out of conditions related to Domestic Violence. The remainder of these Policies and Procedures focuses on all other types of transfers sought between PSH projects.

## Section 1. Emergency Transfers Related to Domestic Violence

It is the policy of the BCCC to allow all persons seeking, or who are receiving, CoC Program assistance via CoC housing and services, and who are victims of domestic violence, dating violence, sexual assault, and/or stalking, to request an emergency transfer from the project participant's current unit to another unit. Such action is in accordance with the Violence Against Women Act (VAWA).

Although the ability to request a transfer is available to all regardless of sex, gender identity or sexual orientation, the ability to honor such a request for project participants currently receiving assistance, however, may depend upon a preliminary determination that the project participant is, or has been, a victim of domestic violence, dating violence, sexual assault and/or stalking and on whether the housing provider (HP) has another dwelling unit available and safe to offer the project participant for temporary or more permanent occupancy.

All CoC project participants shall be informed of their right to transfer in accordance with this Emergency Transfer Plan, Policies and Procedures.

### 1.1 Eligibility for Emergency Transfers

A project participant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer if:

- The project participant reasonably believes that there is a threat of imminent harm from further violence if the project participant remains within the same unit,
- The project participant is a victim of sexual assault,

- The sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A project participant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Project participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

## **1.2 Procedures**

### Emergency Transfer Request Documentation

To request an emergency transfer, the project participant shall notify the HP's management office and submit a written request for a transfer to another available unit. (The HP will provide reasonable accommodations to this policy for individuals with disabilities). The project participant's written request for an emergency transfer should include either:

- a. A statement expressing that the project participant reasonably believes that there is a threat of imminent harm from further violence if the project participant were to remain in the same dwelling unit assisted under HP's program; OR
- b. A statement that the project participant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the project participant's request for an emergency transfer.

### Processing the Request

Once the request is made according to these procedures, the HP should work internally to relocate the project participant within the same project or a comparable unit that may fall under another project of the HP. If this cannot be done for lack of appropriate housing, the HP must contact the Bristol County Coordinated Entry System to determine the availability of another unit within the CoC that will appropriately accommodate the needs of the project participant's safety.

### Confidentiality

The HP will keep confidential any information that the project participant submits in requesting an emergency transfer, and information about the emergency transfer, unless the project participant gives the HP written permission to release the information on a time limited basis (such as in working with Coordinated Entry staff or another agency in securing an appropriate unit to which the project participant may transfer), 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 project. This includes keeping confidential the new location of the dwelling unit of the project participant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the project participant. The *Notice of Occupancy Rights* under the Violence Against Women Act For All Tenants provides more information about the HP's responsibility in maintaining the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

### Emergency Transfer Timing and Availability

The HP cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. The HP will, however, act as quickly as possible to move a project participant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a project participant reasonably believes a proposed transfer would not be safe, the project participant may request a transfer to a different unit. If a unit is available, the transferred project participant must agree to abide by the terms and conditions that govern occupancy in the unit to which the project participant has been transferred. The HP may be unable to transfer a project participant to a particular unit if the project participant has not or cannot establish eligibility for that unit.

If the HP has no safe and available units for which a project participant who needs an emergency is eligible, the HP will discuss this with the Coordinated Entry Team and By-Name List Committee and seek their assistance in identifying other HPs who may have safe and available units to which the project participant could move.

At the project participant's request, the HP will also assist project participants in contacting local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

### Safety and Security of Project Participants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the project participant is urged to take all reasonable precautions to be safe. Project participants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY). *(Please note: as these national numbers can change, those reaching out are encouraged to verify updated phone numbers as needed).*

Project participants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>. Project participants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

## **Section 2. Transfers Related to Non-DV Conditions**

HUD regulations and guidance do permit the transfer of participants between Permanent Supportive Housing (PSH) projects, though it is *not* a unilateral or casual decision.

The process is handled through the local Continuum of Care's (CoC) Coordinated Entry System (CES) and is reserved for specific circumstances, not for convenience nor at the sole discretion of the HP. HUD's CoC PSH projects are designed to provide

permanent, time-unlimited housing, and project participants are not to be moved arbitrarily whether as the result of the household's desire for a different unit nor the agency's desire to relocate them for convenience. To be clear: while PSH is intended

as permanent housing, that, in and of itself, was never a reason to prohibit transfers but rather to prevent project participants from prematurely exiting their permanent supportive housing unit.

Over time HUD has issued guidance to clarify specific transfer procedures, such as for VAWA protections or the disposition of project-based assistance<sup>1</sup>. In essence, the possibility of transferring was built into the system from the beginning, if it adheres to principles that protect the project participant and their right to permanent housing.

Transfers between PSH projects have always been permissible under certain circumstances, and HUD has repeatedly clarified that while arbitrary moves are not permitted, PSH project participants are not confined to their original project. HUD regulations have consistently focused on project participant protections and the permanency of the housing, not the location of the housing.

## 2.1 Conditions under which a transfer from PSH to PSH may be permitted

There are several conditions under which a transfer between PSH projects may be permitted within the MA-505 Continuum of Care:

- a. Emergency transfers (VAWA): Under the Violence Against Women Act (VAWA), emergency transfers are a priority for participants who are victims of domestic violence, dating violence, sexual assault, or stalking. This applies if the participant requests a transfer and reasonably believes they are in imminent danger. The MA-505 CoC has an adopted Emergency Transfer Plan that articulates specifics as to conditions and processes for such transfers.
- b. Extraordinary Participant need: A transfer may be initiated if a participant's needs have changed and another PSH project is a better match for their current situation. The goal is always to reduce the risk of the participant returning to homelessness. In the case of the MA-505 CoC, an extraordinary participant need specifically addresses those project participants with increased/new "severe service

### Important!



*In addition to understanding conditions which may rise to the level of a permitted transfer between PSH programs, it is similarly critical to understand that no such transfer is permitted at the provider's discretion.*

*A key HUD regulation is that neither a recipient nor subrecipient cannot force a participant to transfer or exit a PSH project because they have been deemed "ready" to leave.*

*PSH is intended to be permanent, with no time limits, and the participant can only be exited if they choose to leave or are terminated for cause.*

<sup>1</sup> These are clarifications of existing rights and procedures, not a fundamental change in the rules.

needs and vulnerability” consistent with the established CoC definition such as documented evidence of a life-threatening medical condition that precludes a household member from climbing stairs or living in a particular unit for a medically related reason.

- c. **Internal transfers:** A participant may be moved from one project to another within the same PSH project. This type of transfer typically involves a move to a different unit, and it's used when a different intervention is needed to help the participant remain stably housed. One such example might be an agency who relocates a willing project participant within the same PSH project to accommodate another project participant’s need for a particular unit consistent with one of the two previously discussed conditions.
- d. **Property related need:** Because of conditions related to the PSH unit, itself (see “*Property or Project Related Reasons*” within the following section), a project participant may be eligible for a move from one PSH project to another PSH project.

## 2.2 Conditions that might arise that lend themselves to consideration for a transfer between PSH units

### a. Participant- Related Reasons.

- **Emergency transfers under VAWA:** A high-priority reason for transfer is a request from a participant who is a victim of domestic violence, dating violence, sexual assault, or stalking. The project participant must reasonably believe they are in imminent danger if they remain in their current unit. Additional information is provided under Section 1.0 of these Policies and Procedures.
- **Medical and accommodation needs:** A participant with a serious physical or mental impairment may request a transfer if a different unit would substantially improve their health or better accommodate their disability. Examples include needing a ground-floor or wheelchair-accessible unit.
- **Changing service needs:** As a participant's needs evolve, another PSH project with a different service model or level of support may become a more appropriate match. A transfer may be sought after other interventions have been exhausted.
- **Location and support system:** A participant may need to move closer to their support system, employment, or medical services. Transfers are also considered when a participant needs to move outside the geographic area their provider serves.
- **Household composition changes:** Changes in a family's size can lead to a transfer request if the unit is no longer an appropriate size (whether too large or too small).
- **Protection from threats:** This includes transferring for protection against a criminal attack, harassment, or retaliation for being a witness to a crime.

b. Property or Project-Related Reasons.

- **Unit-related issues:** This includes severe and unresolved maintenance problems that render/may render a unit unsafe or unhealthy, such as fire damage, gas leaks, or contamination. The Collaborative Applicant shall review and determine whether the issues presented meet such circumstances.
- **Provider-client conflict:** In cases where there has been a significant and unresolvable breakdown in the relationship between a provider and a project participant, a transfer may be requested after all mediation attempts have been exhausted and are documented in client files.
- **Project closure:** If a PSH project is being ramped down due to funding shortages, participants may be transferred to another PSH project operated by the same agency, or if unavailable, a different PSH agency, as a last resort to maintain stable housing.
- **Housing type change:** Some transfers may be for a participant who needs a different type of housing, such as moving from a project-based PSH to a scattered-site unit or vice versa.
- **Collaborative Applicant discretion:** In cases with extraordinary merit not otherwise covered within this section, the Collaborative Applicant shall reserve the right to make the determination as to whether existing conditions warrant transfer.

### 2.3 Procedures

The MA-505 CoC has adopted specific procedures for handling transfers through its Coordinated Entry Services (CES). The process, including the need to consider an internal move within the same agency or addressing issues through mediation before an external transfer is approved, involves the following steps:

- a. **Request Initiated.** Either the Project Participant (in the case of an Emergency Transfer Request or a Program Participant Related Request) submits a request using the BCCC PSH Transfer Request Form (incorporated as a part of these Policies/Procedures) to the PSH provider agency or the current PSH provider initiates its own request with the consent of the project participant. The request is then forwarded to the CoC's Coordinated Entry Team (CET).
- b. **Coordinated Entry approval:** Transfers must be processed through the CoC's Coordinated Entry System (CES) to ensure proper tracking and prioritization. Once received and complete information provided to the CET, the requested transfer is reviewed and discussed at the next scheduled By-Name List meeting. If the request is determined to meet the CoC's prioritization schedule and/or is consistent with the CoC's capacity and needs, the CET will accept and prioritize the transfer request based on need. Rejected requests for PSH to PSH transfers will be documented by the CET and submitted to the CoC via its Collaborative Applicant identifying reasons for not accepting the request and as may be applicable, presenting an alternative solution.



**Important!**

*No PSH transfers can be made and/or approved solely by the project participant or at the project's discretion.*

- c. **Grantee Inclusion.** The CET will provide all transfer requests, once a determination of acceptance or rejection is made, along with any documentation substantiating such a decision to the project grantee.
- d. **Documentation.** When PSH to PSH transfer is approved, the original provider must share the necessary eligibility documentation with the receiving agency. This ensures the receiving project has a complete file. The transfer must also be properly recorded in HMIS, indicating that the participant moved from one PSH project to another.

Emergency transfers shall be processed as quickly as possible, but the speed of non-emergency transfers is often dependent on the availability of a suitable PSH unit.

#### 2.4 Transfers from PSH to other Project Types

Outside of a PSH to PSH unit transfer, one might hope to transfer a project participant from or to a Rapid Rehousing project. In such cases, the following applies:

- a. PSH to Rapid Rehousing (RRH) transfers. Such transfers are not permitted unless the project participant returns to literal homelessness. A household must be documented as chronically homeless upon entry to an RRH project to be considered for a transfer to a PSH unit.
- b. RRH transfers to PSH are possible if the household was chronically homeless when they entered the RRH project and were placed there as a “bridge” to PSH. This prevents the household from losing its chronically homeless status while waiting for a PSH opening.

#### 2.5 Transfer Denials

Outside of denials arising from an absence of funding and/or PSH unit alternatives, the MA-505 CoC has identified additional specific conditions where a transfer request may be denied.

- a. **Conditions arising for convenience:** A transfer request will be denied when the sole reason for the transfer is borne solely out of a project participant’s desire for a different unit or different location simply as a matter of preference and/or convenience.
- b. **Project Participant Behavior, Project Noncompliance and Leasing Issues:** Transfers may be denied when a project participant violates lease or program rules resulting in property damage, noise disturbances, guest policy violations or lease infractions. Denials may also occur as a result of chronic nonpayment of rent/utilities (as warranted), a failure to engage in required supportive services, threatening or disruptive behavior toward staff or other project participants or criminal activity on program and/or leased unit premises.
- c. **Project Participant Stability Concerns:** Transfers may be postponed or denied if a participant has unresolved behavioral, clinical, or case management issues that should be addressed prior to moving. In some cases, remaining in the current project may better support the participant’s stability and housing retention.
- d. **Lack of CoC Program Eligibility or Household Status:** A transfer request may be denied if the participant no longer meets PSH eligibility requirements,

such as verified disability or chronic homelessness status. In addition, if the household composition does not align with the receiving project's eligibility criteria, the request may not be approved.

- e. **Limited Project Availability or Fit:** Sometimes, no appropriate unit or opening is available in the receiving PSH project. The project may also lack the staffing or clinical capacity to meet the participant's needs. This type of transfer may not promote long-term stability or successful housing outcomes and may therefore be denied.
- f. **Policy or Process Issues:** Requests that do not meet CoC transfer policy or eligibility criteria may be denied. All transfers must follow the Coordinated Entry process and include complete documentation, required signatures, and supporting forms before approval.
- g. **Project or Funding Restrictions:** Transfer requests may be denied when the receiving project operates under a different funding source or serves a distinct population. Certain HUD grants do not permit transfers between specific project types or between Continuums of Care.

---

*Section 1 of this document is based on a Model Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking published by the U.S. Department of Housing and Urban Development, the Federal agency that oversees the CoC program and ensures its compliance with VAWA (Form HUD-5381).*

*Sources used in developing this guidance includes, but was not limited to regulations and guidance surrounding the Violence Against Women Act (VAWA) and the CoC Program Coordinated Entry (CE) requirements including:*

#### **VAWA Requirements**

- **24 CFR § 5.2005(e): Emergency transfer plan.** This regulation requires covered HPs, including CoC recipients, to adopt an emergency transfer plan. This plan allows victims to request an emergency transfer to a different, safe unit if they reasonably believe they are at risk of imminent harm.
- **24 CFR § 5.2005(e)(2): Eligibility for emergency transfers.** This section specifies the criteria for a project participant to qualify for an emergency transfer under VAWA. This includes requesting the transfer and a reasonable belief of a threat of imminent harm or being a victim of sexual assault on the premises within the last 90 days.
- **24 CFR § 5.2007: Documentation.** This outlines the documentation an HP can request from a victim of VAWA violence. It clarifies that a project participant's self-certification is sufficient and the provider cannot require third-party documentation unless the self-certification is conflicting.

#### **CoC Program Coordinated Entry (CE) Requirements**

*HUD mandates that Continuums of Care (CoCs) operate a coordinated entry system, and that transfers between projects be handled through this process.*

- **HUD Notice CPD-17-01: Notice Establishing Additional Requirements for a CoC Centralized or Coordinated Assessment System.** This notice sets forth the requirements for CoCs to establish and operate a CE process. While it does not detail specific transfer procedures, it establishes the framework for how communities must prioritize and refer participants to housing and services based on need.
- **CoC Program Interim Rule (24 CFR Part 578):** This rule describes the CoC program components, including PSH. It does not explicitly lay out transfer rules but establishes the expectation that PSH is permanent and that participants cannot be terminated unless they choose to exit or are terminated for cause. The transfer process is an exception to a typical exit, allowing a participant to remain within the PSH system.