



Transferring CoC Project Participants

Guidance for Transferring Project Participants
between Permanent Supportive Housing Projects

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Office of Housing and Community Development

OVERVIEW

This guidance is published to provide clarity to Continuum of Care (CoC) Permanent Supportive Housing (PSH) subrecipients relating to the U.S. Department of Housing and Urban Development (HUD) CoC Program which necessitates certain conditions be met to permit the transfer of PSH project participants from one program to another. The following information is taken from a combination of statute, regulations and HUD guidance.

Does HUD CoC statute or regulation permit the transfer of CoC PSH project participants between CoC PSH projects?

Yes, 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 provider. HUD's CoC PSH projects are designed to provide permanent, time-unlimited housing, and 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.

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 assistance¹. 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 tenants are not confined to their original project. HUD regulations have consistently focused on tenant protections and the permanency of the housing, not the location of the housing.

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

Under what conditions might a transfer from one PSH to another PSH be permitted?

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

- **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.
- **Extraordinary Participant need:** A transfer may be initiated if a participant's needs have changed and another PSH program 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 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.
- **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.
- **Property related need:** Because of conditions related to the PSH unit, itself (see “Property or Program Related Reasons” within the following section), a project participant may be eligible for a move from one PSH project to another PSH project.

In addition to understanding under what conditions such a transfer may be permitted, it is also critical to understand that no such transfer is permitted at the provider's discretion. A key HUD regulation is that a recipient or 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.*

What reasons might arise that lend themselves to consideration for a transfer between PSH units?

Participant related reasons, property and or program-related issues can lead to a request for transfer between PSH units. Such reasons include:

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. The CoC's Emergency Transfer Policy further elaborates on such reasoning.

- **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 program 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.

Property or program-related reasons

- **Unit-related issues:** This includes severe and unresolved maintenance problems that render a unit unsafe or unhealthy, such as fire damage, gas leaks, or contamination.
- **Provider-client conflict:** In cases where there has been a significant and unresolvable breakdown in the relationship between a provider and a participant, a transfer may be requested after all mediation attempts have been exhausted.
- **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.

Process for a PSH-to-PSH transfer

The MA-505 CoC has specific procedures for handling transfers through its Coordinated Entry Services (CES) that are described within the CoC's adopted Emergency Transfer Protocols as amended. That 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:

- **Request Initiated.** Either the Project Participant (in the case of an Emergency Transfer Request or a Participant Related Request) submits a request 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).
- **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.

- **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.

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

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.

Are transfers from PSH to other program types permissible?

- **PSH to Rapid Re-housing (RRH) transfers are not permitted** unless the participant returns to literal homelessness. A household must be documented as chronically homeless upon entry to an RRH program to be considered for a transfer to PSH.
- **Rapid Re-housing to PSH transfers are possible** if the household was chronically homeless when they entered the RRH program and was placed there as a "bridge" to PSH. This prevents them from losing their chronically homeless status while waiting for a PSH opening.

Questions relative to this guidance can be directed to the OHCD at 508.979.1500 or via email to staff: Jennifer.Clarke@newbedford-ma.gov or Jose.Maia@newbedford-ma.gov.

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 housing providers, 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 tenant 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 a housing provider can request from a victim of VAWA violence. It clarifies that a tenant'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.
- **HUD Exchange guidance:** Resources published on the HUD Exchange website further clarify CoC policies. They state that transfers between PSH projects, coordinated through the CE process, are permitted when a transfer is deemed necessary. This could be due to a participant's changing needs, location, or the need for a different service model.
- **Community transfer protocols:** The specific rules and forms for PSH-to-PSH transfers are developed by each local CoC, based on the flexibility allowed by HUD. The CoC's emergency transfer plan often details the process and includes a prioritization policy for transfers through the CE system.

CoC Policy Requirements

The Bristol County Continuum of Care (MA-505) follows both its Coordinated Entry System Operating Standards (*amended September 2025*) and its Emergency Transfer Protocols (*amended November 2025*) in the execution of its PSH to PSH transfer process.