

## Austin/ Travis County Continuum of Care

### Permanent Supportive Housing (PSH) Project Transfer Policy and Process

The Austin/ Travis County Continuum of Care supports the request and transfer of program participants from one project type to another when needed to support households who may need specific services or accommodations to support long-term housing stability. Transfer requests may be used in rare circumstances when all other options have been exhausted by the household to prevent returns to homelessness. All transfers must be requested and approved through the procedures in the Austin/ Travis County CoC's Transfer Policy and Process outlined below.

#### The community has developed the following underlying assumptions to be used when requesting transfers:

1. Transfers occurs in rare instances and are reserved for urgent cases;
2. All PSH to PSH transfers must be coordinated through the Austin/Travis County Coordinated Entry Process;
3. Housing providers are to exhaust all other options and resources to provide services and alternative housing solutions and/or problem-solving before requesting to transfer. Housing providers may need to document information demonstrating that all options have been explored, attempted, and did not resolve the need for a transfer.

Examples of these efforts can include increasing the intensity of case management or wrap around services; other non-CoC rental subsidies; working with the project's HUD CPD representative to resolve shifts in family composition within their grant and budget; and/or working with property managers to move or rehouse a household in a more appropriate unit;

4. Although all transfer requests will be reviewed, not all transfers may be approved or guarantee the successful transition between programs
5. Transfer requests related to Reasonable Accommodations/Modifications and/or VAWA Housing Protections External Emergency Transfer will be prioritized above all other transfer requests.

**NOTE: Transfers due to fleeing/experiencing domestic violence, dating violence, sexual assault, stalking and/or human trafficking will be prioritized and resolved in accordance with the [Austin/Travis County Continuum of Care Violence Against Women Act \(VAWA\) Policies & Procedures](#). Please see the [VAWA External Transfer Request Workflow Form](#). Staff should carefully reference the *Austin / Travis County CoC Guidance on Applicability of VAWA Protections***

#### Process

All requests will be reviewed, and the requesting agency will be notified in writing of the results of the review process once available. *Table.1 Transfer Request Review Entity* identified the appropriate request review entity. *Table 2. Transfer Reasoning* outlines the circumstances in which a Transfer Request can be made. The request will be reviewed based on meeting the outlined transfer criteria, demonstrating need, and available resources matching the participant's needs to support the successful transfer.

## **Review Process for Conflict and Other Safety Concern Outside of VAWA, Reasonable Accommodation/Modification, Household Composition**

The Coordinated Entry Entity is responsible for reviewing and determining the outcome of transfer requests pertaining to transfer reasons identified in *Table.1 Transfer Reasoning*. The PSH Workgroup Chair will approve the transfer request determination. The Coordinated Entry Entity will provide a written response to the transfer request.

If necessary, the PSH Workgroup Chair can request that a transfer request be presented to a community request review panel to be held within a week of the review request due to the high priority of the transfer request. If the PSH Policy Workgroup Chair is conflicted, then they will select a non-conflicted representative. A representative is considered conflicted if the individual is employed by the grant recipient which requests the transfer under review.

## **Review Process for Service Level and Changes in Circumstances Request**

All transfer requests due to the household's change in service need or household change in circumstances will be reviewed by a community request review panel, at either the Permanent Supportive Housing Policy Workgroup or by a body similar in composition. The group will be 5 representatives, including the Permanent Supportive Housing Policy Workgroup Chair and a CE representative, without conflicts of interest from a diverse pool of agencies. If the PSH Policy Workgroup Chair is conflicted, then they will select a non-conflicted representative. A representative is considered conflicted if the individual is employed by the grant recipient which requests the transfer under review.

The Coordinated Entry Entity will review current community capacity and project eligibility requirements to identify projects which address the participants needs and with current capacity or an expected capacity within the near future. The CE representative will inform the community review panel of identified projects with current or expected capacity. A transfer request may be denied if there are no appropriate projects to meet the participants identified need or community capacity to address the participant needs.

The request review panel will review the transfer request and decide if the requesting project has provided appropriate solutions and options to address the participant's identified needs. The community review panel must reach a unanimous decision to approve a transfer. The outcome of the community review panel will be communicated in writing to the requesting agency in writing by the PSH Workgroup Chair or their representative.

## **Facilitating Transfers**

Approved transfer requests will take priority over new referrals to all eligible and appropriate intervention types which can meet the identified needs of the transferring participant. Agencies submitting the transfer request must continue to provide services and support to the participant, including supporting attaining housing or maintaining housing, to be transferred and to assist with the transfer. Projects should follow established policies and procedures to accurately document participant transfer, HMIS Project Exit, and HMIS Project Entry.

Projects receiving an approved referral must verify participant eligibility criteria before project enrollment. Documentation of chronic homelessness status as well as recordkeeping outlining the

transfer approval must be sourced from the original project enrollment which has requested the project transfer.

If a transfer is denied, the project must continue to provide services to the participant and work with the participant to address the needs identified within the Transfer Request in accordance with the project’s policies and procedures.

**Process Overview**



**Table 1. Transfer Request Review Entity**

Transfer Request Reason	Approval Time	Approving Body
Conflict and Safety Concern Outside of VAWA; Reasonable Accommodation; Household Composition	As quickly as possible, no longer than two days	CE Lead Entity
Service Level or Household Change in Circumstance	Monthly	PSH Workgroup

**Table 2. Transfer Reasoning**

Reason	Definition	What it is not
Conflict and Safety Concerns Outside of VAWA	The space has become unsafe for the household that does not qualify for emergency transfer criteria under VAWA Housing Protection. As examples, conflict in which safety concerns are equally justified under all parties involved and/or the perpetrator cannot clearly be determined.	Crime in the neighborhood that is not specifically targeting the household or building.
Reasonable Accommodations and/or Modifications	The household is unable to live in their home due to requiring accommodations that cannot be made. Examples can include requiring an elevator or larger door frame for a wheelchair in a building without these features, larger units required due to medical equipment or needing an additional room in order to accommodate a live-in aid.	Accessibility accommodations needed that can be put into place such as grab bars or a lift.
Change in Household Composition	The family size changes so that the household requires a smaller or larger unit. This can include the unit size impacting the household retaining or obtaining custody of children or households that included children and now	Desire for a larger unit that is not required based on family size.

	only include the parent/s. Alternative programs are able to provide services that match the family composition's needs – such as childcare vouchers and/or family specific therapeutic services. Spouses are not approved to be added to lease during the application process and move to alternative units or programs to support all household members being allowed in the unit/program.	
Service Level	The needs of the household cannot be accommodated by the current provider and additional community support without a transfer and is only utilized after other interventions are attempted. This can include the need to move from a scattered site unit to a project-based location or vice versa to accommodate service needs. Specialized program designs that may support specific needs may be considered as reasons for transfers such as clients who would benefit from programs that offer ACT services, Peer Support and/or medical models	Client is challenging to engage in services or has ongoing conflicts with agency staff.
Change in Circumstance Resulting in Eligibility	Housing units that limit eligibility in certain circumstances such as housing facilities that limit persons who are enrolled in higher education and/or exceed income limits or require citizenship status.	

**Transfer Denial Examples:**

A transfer request form may be denied for numerous reasons. High performing Permanent Supportive Housing Projects, in accordance with the Austin/Travis County Continuum of Care Written Standards, “will provide a variety of goal-driven services that are flexible and appealing and that are appropriate for participants in various stages of change.” Transfers are most appropriate when changes in the participant’s living situation and/or circumstances conflict with services eligible by the program model, agency resources, and/or participant choice and may lead to mandatory project terminations in compliance with agency policies and procedures.

Reason	Definition
Insufficient Transfer Reasoning	The documentation submitted does not meet the threshold criteria demonstrating the need for a transfer to be approved.
No Community Capacity Currently	There is currently no project within the CoC which has capacity or is expected to have capacity within the near future which could meet the needs outlined in the transfer request.
Current existing resources are not able to meet the request needs	There are currently no projects within the CoC which could meet the participants identified needs.

Further Solution Exploration Required	The transfer request form does not document sufficient exploration of problem-solving using existing program or community resources to address the participant's identified needs outlined in the transfer request
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## Austin/Travis County CoC Guidance on Applicability of VAWA Protections

### Definitions and Context

The federal definition of fleeing or attempting to flee domestic violence encompasses:

*People who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, human trafficking, or other dangerous or life-threatening situations related to violence.*

In order to determine if a Transfer Request would be covered under a VAWA Emergency Transfer or not, it can be helpful to refer back to this definition to see if VAWA protections will apply.

### Screening Questions and Tips

**Does it relate to abuse, threats, or coercive control by a household member (partner, family member, caregiver, roommate, or anyone residing in the home – authorized occupant or not)?**

If someone in the home is being abused in their home, they likely qualify for protections, regardless of their relationship to the perpetrator.

**Does it relate to abuse, threats, harassment or coercive control by a current or former dating partner (or someone acting on their behalf)?**

If a current or former partner (or their friends, family members or associates) is abusing a client, the client should qualify for protections even if the abuser has never lived with them.

**Does it relate to sexual assault?**

There is a significant co-occurrence of sexual assault with domestic or dating violence, human trafficking, and/or stalking so a client reporting sexual assault will likely qualify for protections. Please be careful about denying VAWA claims based on sexual assault just because the assault occurred more than 90 days prior or did not take place at the client's home.

**Does it relate to stalking?**

Conflicts with neighbors, property management, current/former friends, coworkers, etc. all have the potential to escalate into stalking. If a client is reporting a pattern of abuse or harassment by another person and expresses fear for their safety at home, they may qualify for protections as a victim of stalking.

**Does it relate to human trafficking?**

A person who has been trafficked may need to relocate in order to escape from the trafficking or to get away from ongoing abuse and harassment by a trafficker trying to regain control and recoup income. If a trafficker knows where they live, they are in danger. In addition, if a client or their child is being groomed and recruited by potential traffickers in the community (at the bus stop, on their way to the store, in the courtyard of their apartment complex) they may need to relocate for safety.

**Is this a dangerous or life-threatening situation in the home?**

General conflict or disagreements with neighbors usually don't meet the criteria for VAWA. Neither do general concerns about a "bad neighborhood." However, there is a provision for dangerous or life-threatening situations in the home that can help protect clients who might otherwise fall through the cracks. If the client was attacked in a hate crime outside their complex, they could still be protected. If they had a disagreement with their neighbor, and the neighbor pulled a gun on them and threatened their life, they could be protected. If a bullet was fired into their home and lodged above their kid's bed, they could be protected.