

## D.8/F.8

### Homeless Continuum of Care of Stark County's Policies Governing Emergency Transfers for Victims of Domestic Violence

#### I. Requirement that All CoC- and ESG-Funded Housing Projects Develop Emergency Transfer Plans

- A. Regulatory Basis of the Requirement. As set forth in 24 CFR Part 5, Subpart L, HUD requires that "covered housing programs," including homeless programs receiving funds from the Emergency Solutions Grant (ESG) Program or the Continuum of Care (CoC) Grant Program, adopt emergency transfer plans that enable program participants who are beneficiaries of the Violence Against Women Act (VAWA) to transfer from one housing unit to another in the event they feel unsafe in their current housing unit.
- B. Project Participants Covered by the Required Plans. The required plans are intended to benefit tenants who receive rental assistance from or reside in a unit subsidized by a covered housing program if those tenants are victims of domestic violence, dating violence, sexual assault, or stalking (VAWA tenants) and if:
1. They expressly request a transfer; and
  2. They satisfy either of the following requirements:
    - a. They reasonably believe there is a threat of imminent harm from further violence if they remain within their current housing unit; or
    - b. They have been victims of sexual assault and either reasonably believe that they are at imminent risk of further violence if they remain in their current housing unit or the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for a transfer.
- C. Internal and External Emergency Transfers. The mandated transfer plans must include provisions that allow VAWA tenants to make "internal emergency transfers," *i.e.*, transfers within the same housing project, when a safe unit is immediately available. For cases in which a safe unit is not immediately available, the plans must, among other things, describe reasonable efforts the covered housing program will make to assist VAWA tenants who wish to make external emergency transfers, *i.e.*, transfers out of their current housing project.

#### II. The HCCSC's Role in Promoting Emergency Transfers for Victims of Domestic Violence

- A. Ensuring that Housing Projects Have Compliant Transfer Plans. To ensure that all CoC-funded and ESG-funded housing projects have adopted emergency transfer plans that comply with the requirements of in 24 CFR Part 5, Subpart L, HCCSC's Collaborative Applicant will include a review of those plans in its annual review of all CoC-funded housing projects and will encourage the sole ESG

recipient in its geographic area, the City of Canton, to include a similar review in their annual assessment of all ESG-funded projects.

B. Facilitating Emergency Transfers between Housing Projects.

1. Through the Homeless Navigation Hotline (the Hotline), HCCSC's coordinated entry system (CES) will facilitate emergency transfers of VAWA tenants by taking the steps outlined in Section VI of the HCCSC's *Coordinated Entry Guide* when housing projects have received requests for an emergency transfer from VAWA tenants.
2. In facilitating emergency transfers, the Hotline will be subject to the same confidentiality rules that apply to covered housing projects under 24 CFR Part 5, Subpart L. Section 5.2005 (e)(1).