

Permanent Supportive Housing (PSH) Transfer Policy and Procedures

Sacramento County Continuum of Care

Policy

The Sacramento Continuum of Care supports the request and transfer of program participants who may need specific services or accommodations to support long-term housing stability. Transfer requests may be used in rare instances when all other options have been exhausted to prevent returns to homelessness and is applicable to PSH-to-PSH transfers only. In the case of transfer requests submitted to prevent program termination, documents that show the reason for termination and due diligence of explored options, attempts at resolution and reasons for lack of resolution may be requested.

Transfer policy and procedures are centered in housing first principles and participant-choice practices. Transfer requests due to fleeing/experiencing domestic violence, dating violence, sexual assault, stalking and/or human trafficking are prioritized over all other requests and follow the specific processes outlines in Sacramento's Continuum of Care Violence Against Women Act (VAWA) Emergency Transfer Plan. This policy also does not cover the process of transferring clients when a HUD-CoC project is closing. When an entire project is closing, SSF will work with the applicable agency and HUD to develop a plan of action to ensure that, to the extent possible, no participants return to homelessness (see the CoC's Defunded Project Policy).

All other transfers must be requested and approved through the procedures outlined below.

Procedures

Internal Transfer

HUD-CoC housing providers can request an internal transfer between projects within the same agency.

Housing providers must complete a Transfer Request Form, which includes the reason for transfer, and submit it to the CES Manager. Case conferencing or additional information including the acknowledgement of client choice about the transfer may be needed prior to approving the transfer. After review, the CES manager will send a notification email to the provider of the approval or denial. Standard HMIS practices will still apply.

External Transfer

HUD-CoC housing providers can request a participant transfer to a program with a different provider, if the participant meets eligibility. Providers requesting an external transfer must complete a Transfer Request Form and submit it to the CES Manager. If possible, the provider requesting the transfer will provide written advocacy from a third-party service provider, and documentation from the participant acknowledging the transfer is their choice.

All requests will be reviewed based on meeting the outlined transfer criteria in *Table 1 - Transfer Reasoning*, demonstrated need, and available resources that match the participant's needs to support a successful transfer. The request will be approved on the condition that appropriate housing is available, and that the transfer is warranted. Initial decisions will be based on the information received in the transfer request form.

A written response of the determination will be provided to the requesting program, including rationale for denials in *Table 2- Transfer Denial Reasoning*. If the transfer is denied, the housing program will continue to assist the client with their housing situation. Clients can remain on the transfer roster, in order of priority to be considered when housing becomes available if the transfer denial reason was because current existing resources were not able to meet the request. CES staff will regularly monitor the list for vacancies and appropriate matches. If the client has been on the list for more than 6 months, a new request form will need to be submitted by the housing program. Clients will be removed if they have been on the list for more than 6 months without a new request, no longer need a transfer, or turn down more than three housing options. If the client is removed due to not accepting three housing options, the program must wait 3 months before submitting a new request. Requests for exceptions can be submitted on the Transfer Request Form.

If necessary, requests will be reviewed in case conferencing with the provider requesting the transfer and the receiving provider, prior to facilitation of the transfer. The group may also meet with the program participant to better understand their housing situation and to confirm their choice.

Facilitating a Transfer

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 share eligibility documentation with the receiving provider. The receiving provider must verify participant eligibility criteria before enrolling the client into their project. Both agencies are required to maintain documentation of the process and approval, including:

- Copies of all documentation used to determine eligibility into the original housing program (i.e. Homelessness Certification, Chronic Homelessness Certification, etc.).
- Transfer request as submitted by original housing provider.
- Notification email and HMIS records

Providers submitting the transfer request must continue to provide services and support to the participant to be transferred, including supporting attaining housing or maintaining housing, and to assist with the logistics of the transfer (transportation to appointments, etc.).

Table 1. Transfer Reasoning

Reason	Definition	Insufficient Reason
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, someone has taken over the unit and the household can no longer live there, violence taking place in the apartment building, or tenants in the building harassing the participant.	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 to accommodate a live-in aid.	Feasible accessibility accommodations needed in the current project 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 only include the parent(s)/adults. This can include the need for a young adult to move from a TAY program to an adult program to accommodate service needs.	Desire for a larger unit that is not required based on family size.
Client Choice	The household would be able to reach employment and educational goals, or not have their health jeopardized living in a different location that cannot be obtained in the current program. An example can include needing to be located closer to a medically necessary service such as dialysis. Or the household has identified that they require a different housing provider to successfully maintain housing.	Geographic preference that is unrelated to employment/education/health, preference for a larger unit, or preference for a different provider when challenges with the current provider can be resolved. Client is challenging to engage in services or has ongoing conflicts with agency staff.

Table 2. Transfer Denial Reasoning

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 are currently no projects 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 participant's identified needs.

**Clients can remain on the transfer roster for up to 6 months before a new request is needed.*