

Emergency Transfer Plan (ETP) 101

Community Shelter Board – VAWA Virtual Training Series



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Agenda

- Introduction (5 mins)
- Presentation (70 mins)
 - Why Talk About Survivors?
 - Definitions and Fundamentals
 - Requesting an Emergency Transfer
 - Completing an Emergency Transfer
 - Implementing the Emergency Transfer Plan
 - Eligible Costs
- Q&A (15 mins)

Series Overview

Session	Modality	Date/Time
Violence Against Women Act 101	Live, virtual, recorded	March 31, 1 – 2:30 PM ET
Emergency Transfer Planning 101	Live, virtual, recorded	April 7, 1 – 2:30 PM ET
Emergency Transfer Plan Live Exercises	Live, virtual, <i>not recorded</i>	TBA

Registration link: <https://us06web.zoom.us/meeting/register/VI-GQ7XUTI25LXwK5W7EMQ>

CONTENT WARNING

This presentation is about serving survivors of gender-based violence, including victims of domestic violence, dating violence, sexual assault, and stalking.

This presentation's slides do not contain explicit imagery or language. However, content does not need to be explicit to be upsetting. Attendees are encouraged to take breaks as appropriate.

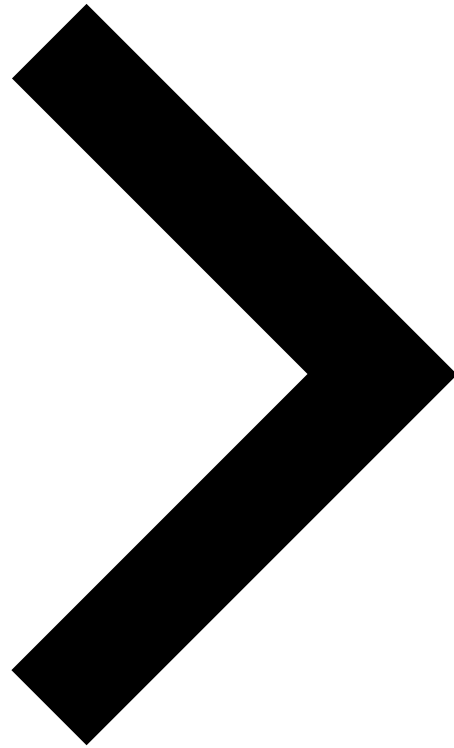


Who's in
the room?





Why Talk About Survivors?



Why do we talk about
VAWA and **gender-**
based violence in
homeless services?

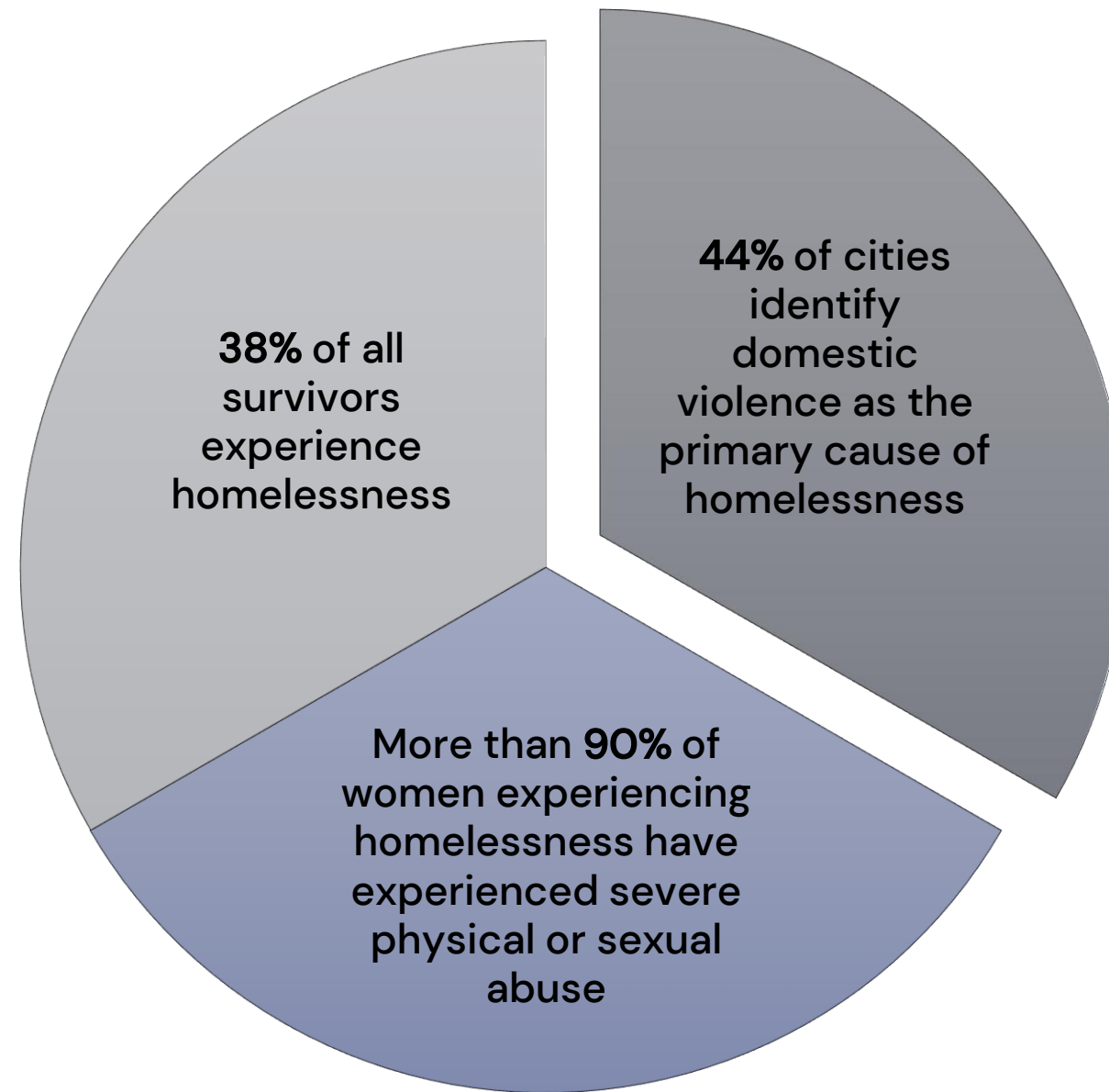
Violence Against Women Act (VAWA) Requirements

VAWA requirements apply to all:

- All CoCs
- All CoC recipients and subrecipients
- All ESG recipients and subrecipients

This means **all CoC and ESG participants** are protected by VAWA, not just participants enrolled in VSP projects

Gender-Based Violence and Homeless Services

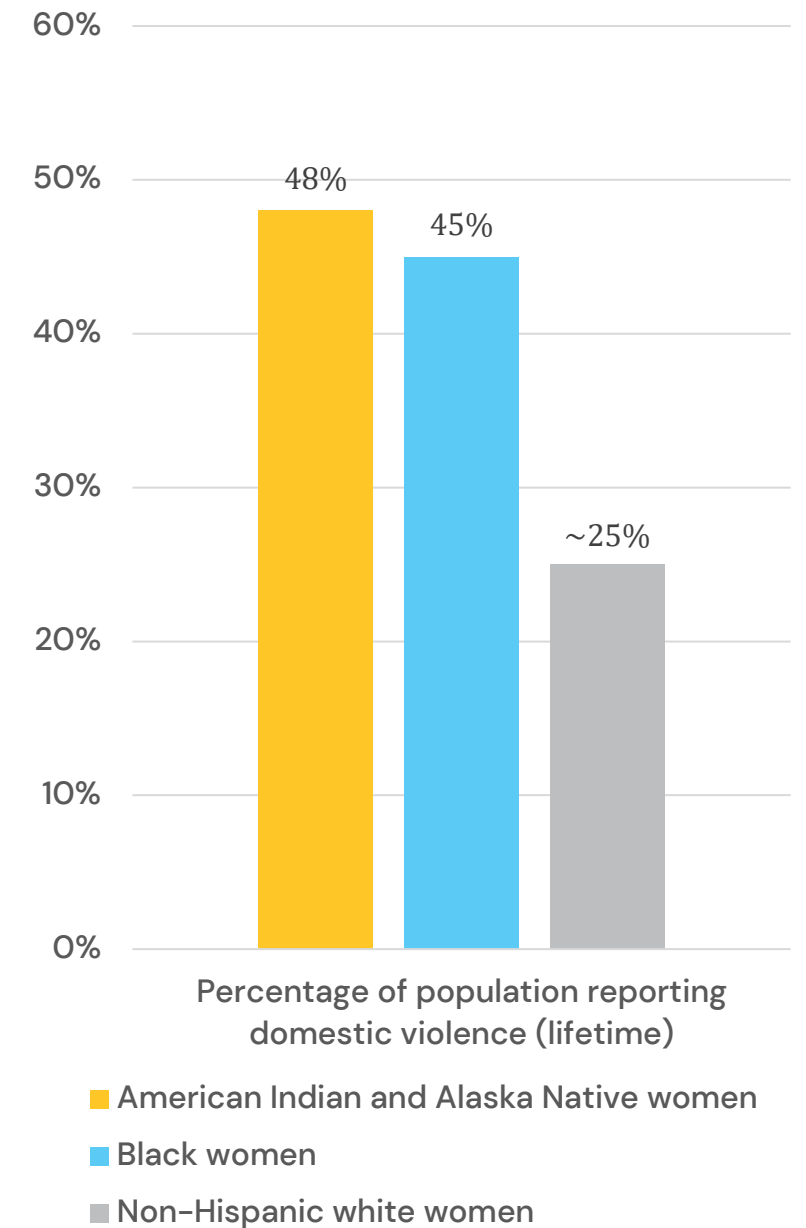


National Network to End Domestic Violence, 2019

VAWA Housing Build Trust

VAWA housing protections **foster trust**, especially in subpopulations that are **disproportionately likely** to experience homelessness and/or have acute safety needs

Queer youth are
2.2x
more likely to experience homelessness





Definitions and Fundamentals

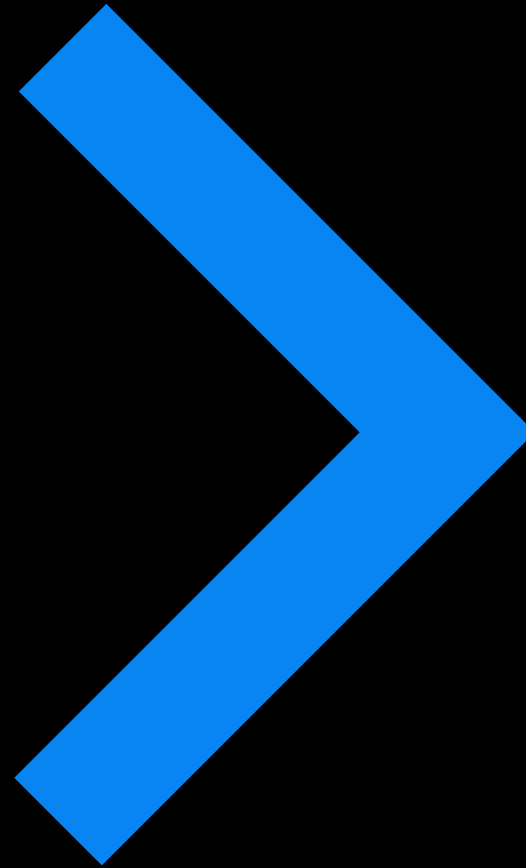
Definitions: Covered Housing Providers

Covered Housing Providers: CoC

- Rapid Re-Housing
- Transitional Housing
- Permanent Supportive Housing

Covered Housing Providers: ESG

- Homelessness Prevention
- Rapid Re-Housing



Emergency Transfer Plan

The process of transferring a CoC or ESG participant who is currently living in subsidized housing to a new, safe unit of their choice

Qualifying for an Emergency Transfer

CoC/ESG tenants qualify for an emergency transfer to a new, safe unit if **their current housing has become unsafe** because EITHER:

- The tenant **reasonably believes there is a threat of imminent harm** from further violence if they remain in their current housing;
OR
- *For victims of sexual assault: the sexual assault occurred on the premises of their current housing* during the 90-calendar-day period preceding the date of their transfer request

What is a Safe Unit?

- Per 24 CFR 5.2005: “a unit that the victim of domestic violence, dating violence, sexual assault, or stalking believes is safe”
- Participant decides: if they say a unit is safe, then the unit is safe
 - (case managers can give an opinion but the decision belongs to the participant)
- Destination unit can be in any geography:
 - Inside or outside the project’s service area/geography
 - Inside or outside the CoC (or ESG recipient’s catchment)
 - Inside or outside the state
 - Inside or outside the continental US to jurisdictions such as Alaska, Hawaii, Puerto Rico, or Guam

Internal vs. External Transfer



Internal transfer

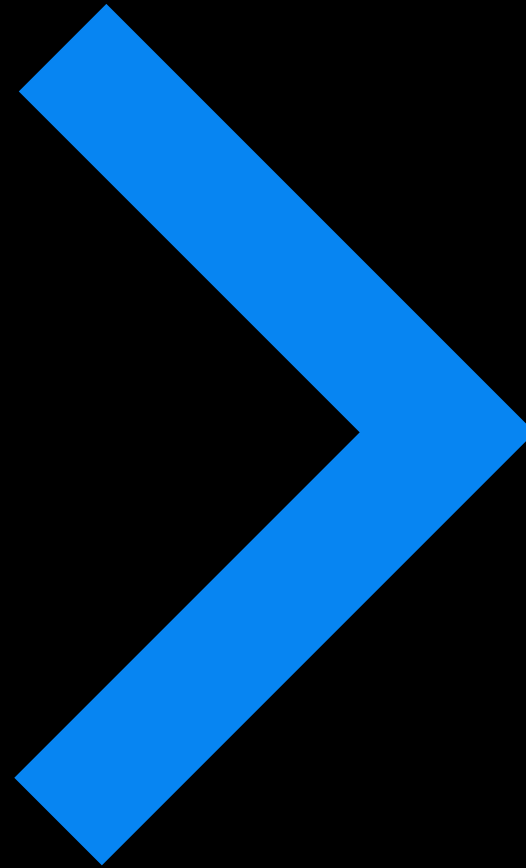
- Destination is a unit where tenant would NOT be a new applicant
- Offered if an internal unit is immediately available
- Offered if an internal unit becomes available later

External transfer

- Destination is a unit where tenant WOULD be a new applicant
- Offered if an internal unit is not immediately available
- For CoC and ESG units: occurs through coordinated entry
- For non-CoC/ESG units: occurs through whatever process they have in place—for example: Section 8/HCV likely uses a waitlist



Requesting an Emergency Transfer



Availability

ETPs **should** be made available to the public and **must** be made available for review on request

Requesting an Emergency Transfer: Process

A tenant in a CoC or ESG covered housing provider program requests a transfer

and

or

The tenant believes there is a threat of recurring violence

The tenant was sexually assaulted on the premises within the last 90 days

Requesting an Emergency Transfer: Prohibited Considerations

CHPs are **prohibited** from considering anything other than a tenant's eligibility (see previous slide) when processing an emergency transfer request

Common **prohibited considerations** include:

-  Project good standing
-  Physical ability or impairment
-  Mental/behavioral health
-  Age (any household member)
-  Family size/configuration
-  Perceived reliability

Requesting an Emergency Transfer: Tenant Process & Documentation

Requesting the transfer

- The tenant must expressly request the transfer
- Transfer requests are often made in writing—but it isn't a statutory requirement
- CoCs may choose to require transfers requests in writing or offer a more flexible approach

Requests must be documented

- Recipients must document both request and outcome
- Outcomes must be reported annually to HUD
- Records must be maintained for at least 3 years

Requesting an Emergency Transfer: Allowable Documentation

ETPs
may...

- Require written self-certification from the survivor to document eligibility for an emergency transfer.

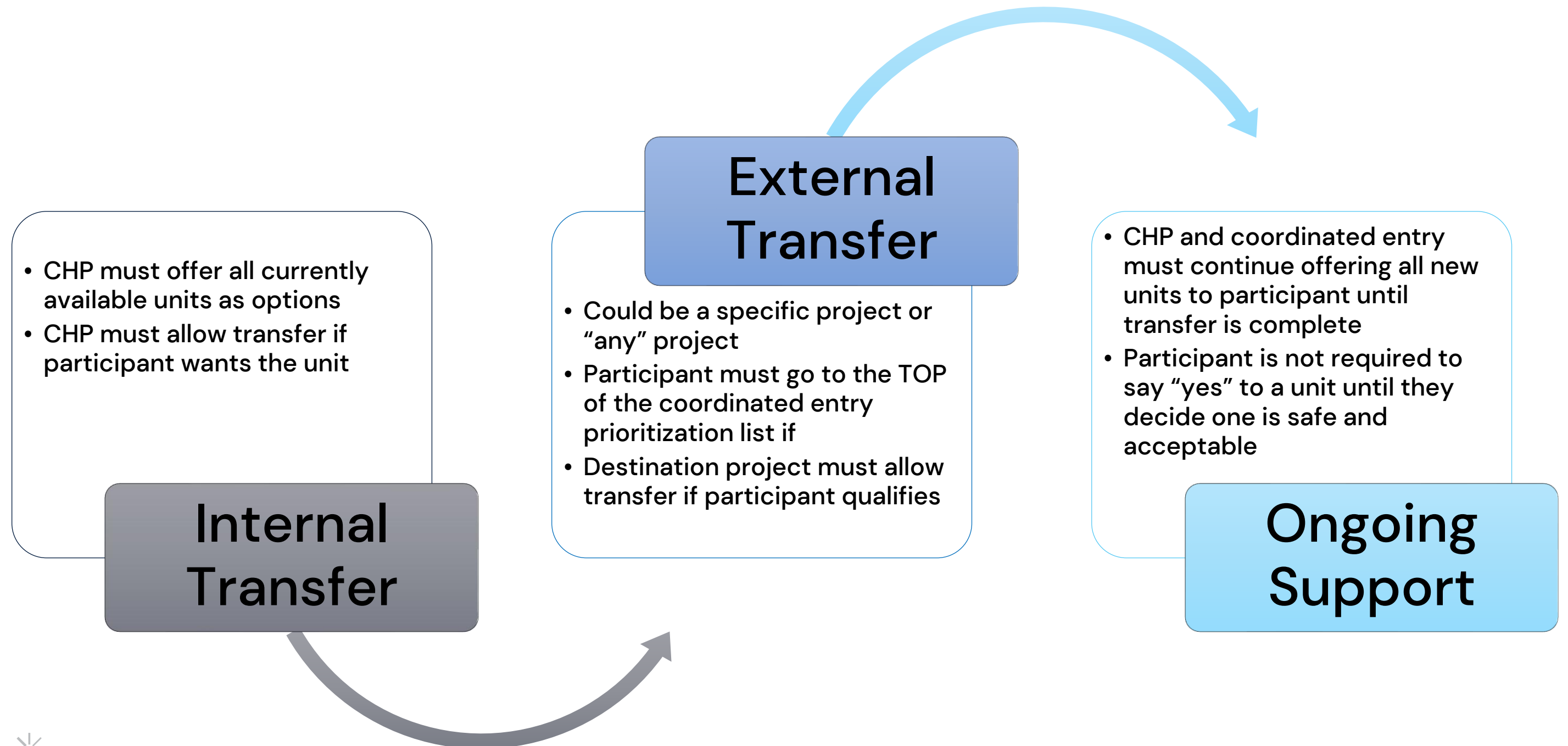
Providers
may...

- Choose to ask survivors for documentation of the incident IF the survivor has not already provided this documentation



Completing an Emergency Transfer

Completing an Emergency Transfer: Process Flow

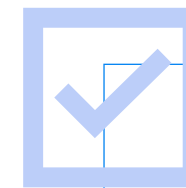


Completing an Emergency Transfer: Prioritization

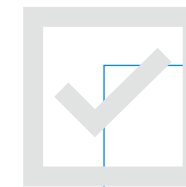
If a safe unit is not immediately available, the participant **must have priority** over all other applicants for all of the following:

- ESG-funded rental assistance under rapid re-housing and homelessness prevention
- CoC-funded rapid re-housing
- CoC-funded transitional housing
- CoC-funded permanent supportive housing

Participants must meet the following criteria to receive priority for and admission to a given project:



All eligibility criteria required by Federal law or HUD NOFA/NOFO



Any additional criteria or preferences established under 24 CFR 579.93(b)(1, 4, 6, 7)

You don't need to memorize the "additional criteria"; instead, refer to these sections as needed

Completing an Emergency Transfer: Criteria and Preferences Under 24 CFR 578.93(b)



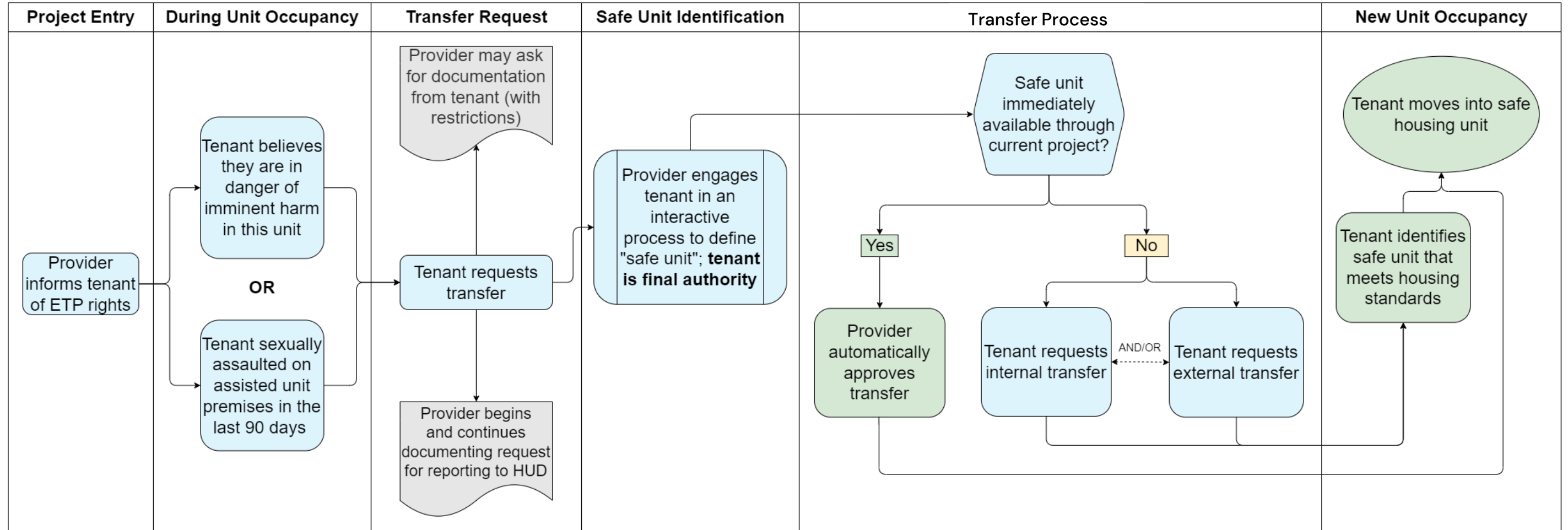
Housing may be limited to one sex if the housing is single structure AND it has shared bedrooms or bathing facilities that make it inappropriate for housing to be limited—see 24 CFR 578.93(b)(1)

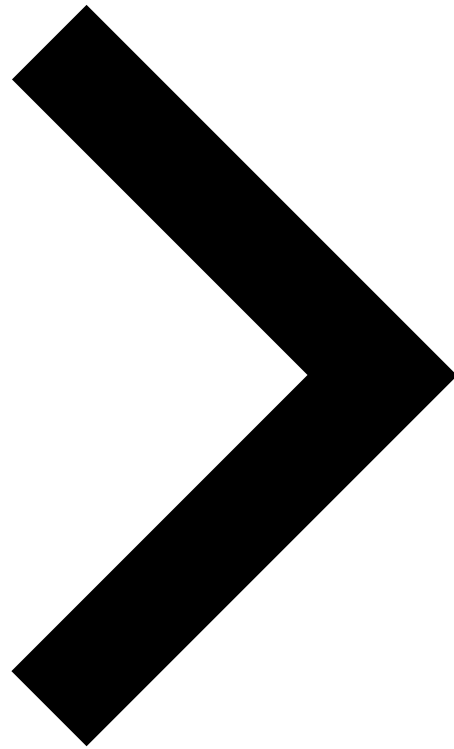
Housing with at least one family with a child under 18 may exclude registered sex offenders and people with a criminal record that includes a violent crime—see 24 CFR 578.93(b)(4)

Housing assisted under a Federal program that is limited to a specific subpopulation (e.g. HOPWA for people living with /AIDS) can be limited to that subpopulation—see 24 CFR 578.93(b)(6)

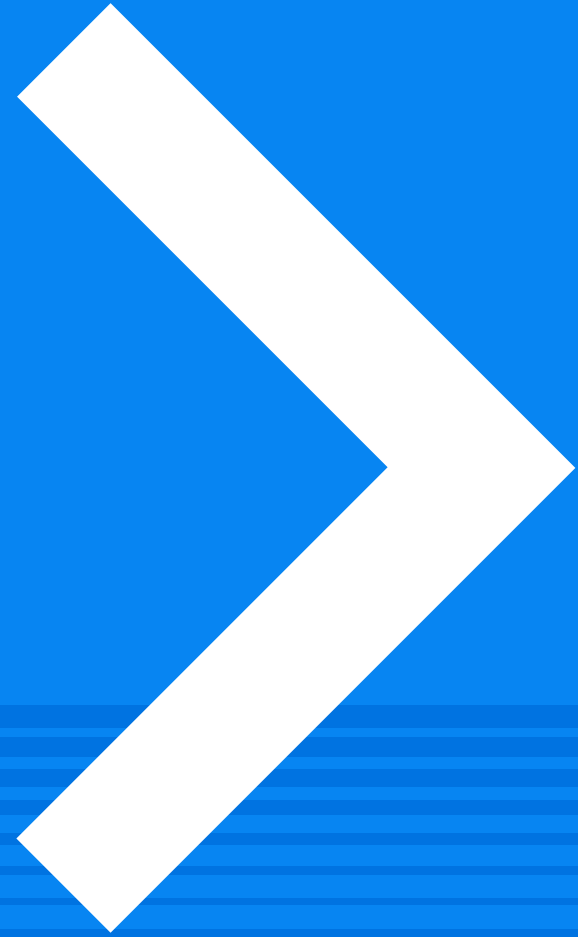
Housing may be limited to an approved subpopulation that needs specialized services such as substance use disorder treatment; some restrictions apply regarding projects designated to serve people with specific disabilities—see 24 CFR 578.93(b)(7)

Completing an Emergency Transfer: Process Flow Chart





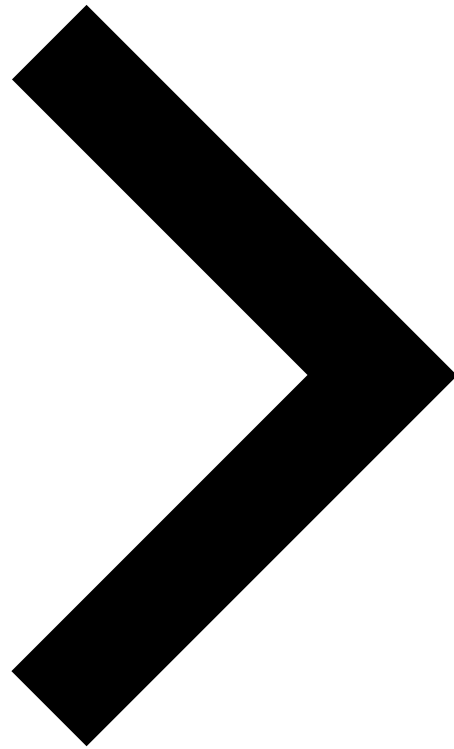
ETPs must incorporate **strict confidentiality measures** to ensure survivor information is protected from access by their abuser



Implementing the Emergency Transfer Plan

Why Deliver This Content?

In general, this content is for CoCs that have not yet developed an ETP; however, we believe that **all CoCs** can benefit from the information here—at every level, **including direct services**



Every community has
**unique needs and
strengths**, so every
community needs a
**customized and locally
driven** emergency
transfer plan

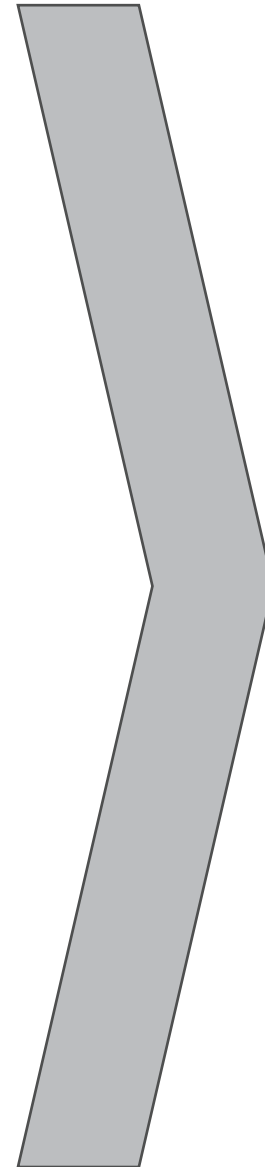
Implementing the ETP: Local Needs



ETPs aren't one-size-fits-all. Communities need to develop ETPs that **meet their needs** and **incorporate their strengths**.

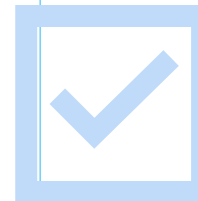
Communities also need to ensure their ETPs are **well advertised** to participants and **understood** by their service providers.

A high quality ETP design supports both goals and should check each of the following boxes.



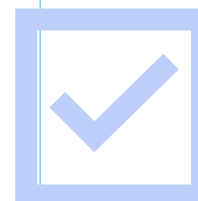
Essential

- Begins with HUD's model plan
- Meets minimum VAWA requirements



Tailored

- Informed by local strengths
- Built in partnership with providers and participants



Flexible

- Exceeds minimum requirements to meet local needs
- Empowers each participant to find safety in their own way

Implementing the ETP: Key Partners



Implementing the ETP: Sample Areas of Flexibility

Incorporating other programs into the ETP process

Defining minimum standards for ETP request processing times

Requiring service providers to engage in safety planning as part of ETP requests

Extending the window for reporting a sexual assault beyond 90 days

Creating an external transfer process within the local coordinated entry system

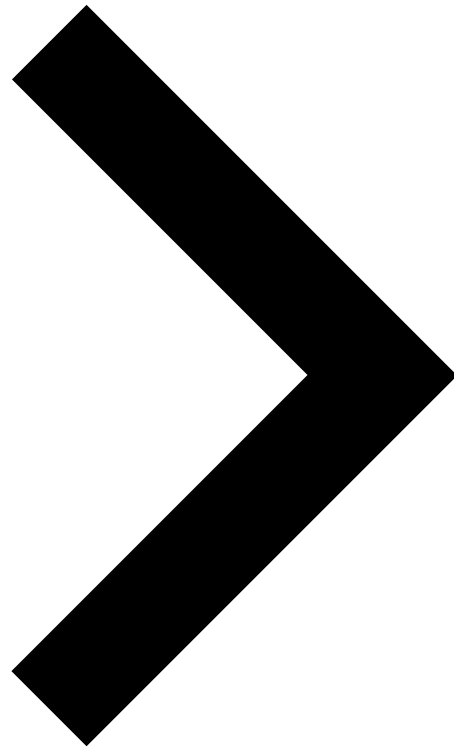
Implementing the ETP: Accessibility and Approachability

Accessible

- Available to all participants
- CHPs proactively educate participants about ETP protections
- Publicly available in multiple places/formats
- Available in languages other than English
- CHPs receive training on completing transfers on a regular basis

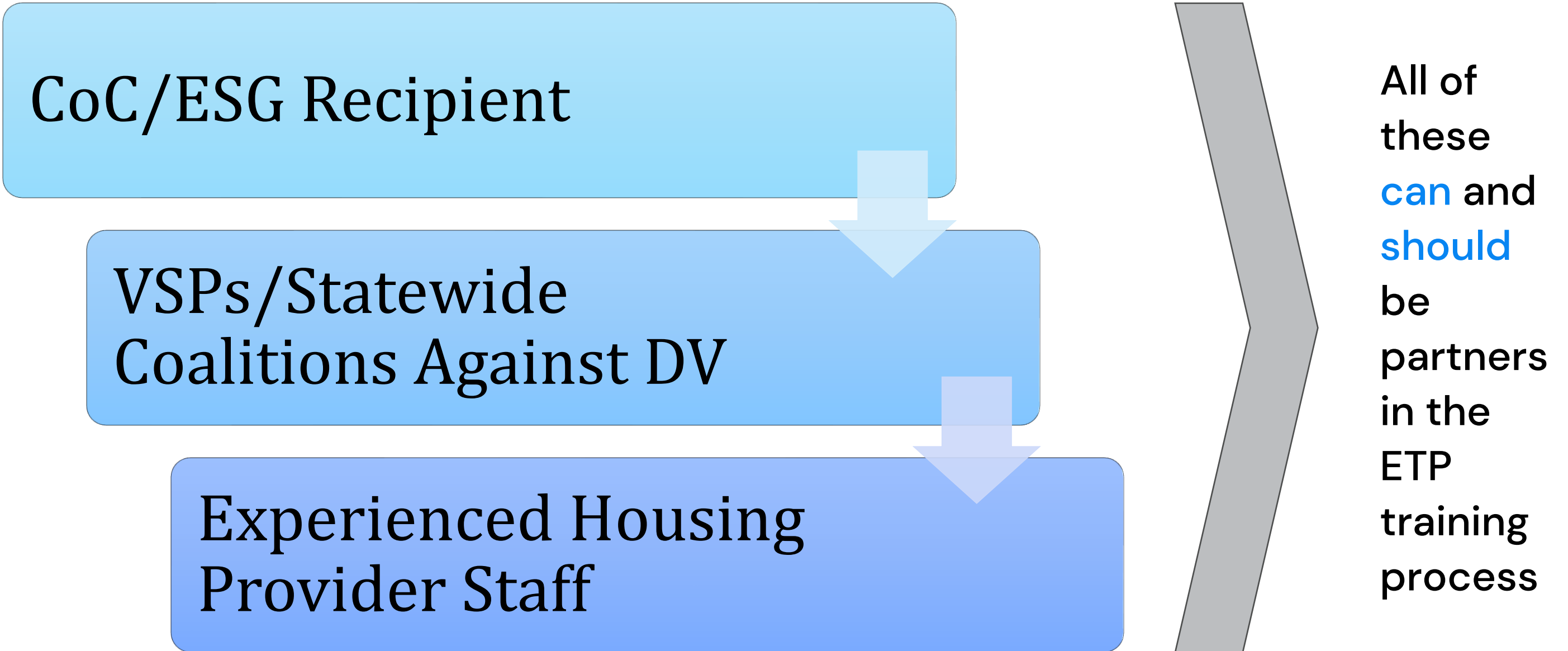
Approachable

- Easy for participants to use
- Written in plain language
- Developed with visual elements to assist navigation
- Specific about what participants can expect, including timeframes for actions and responses

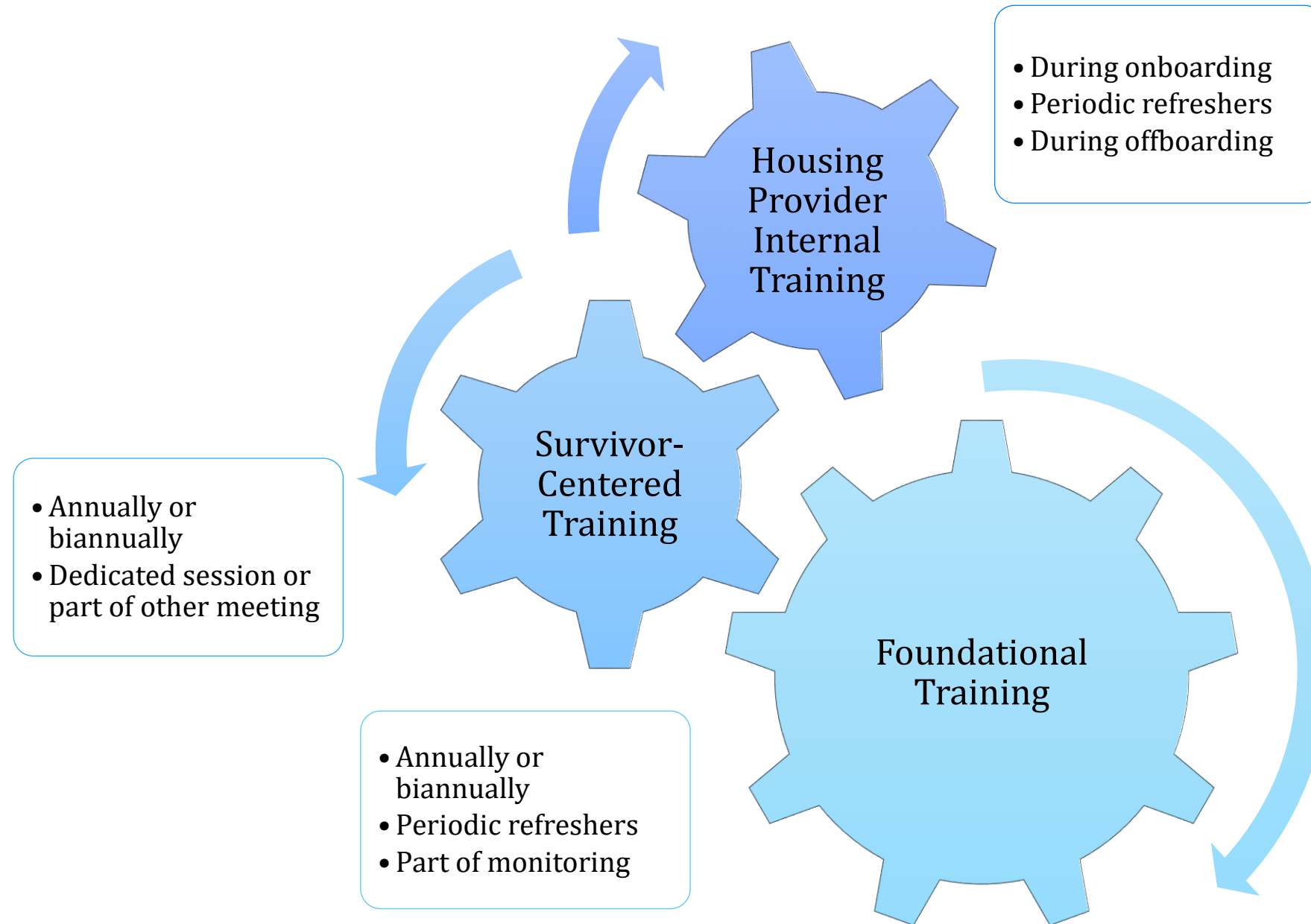


ETPs cannot be successfully implemented without service providers who **understand** the ETP and **have experience** implementing emergency transfers

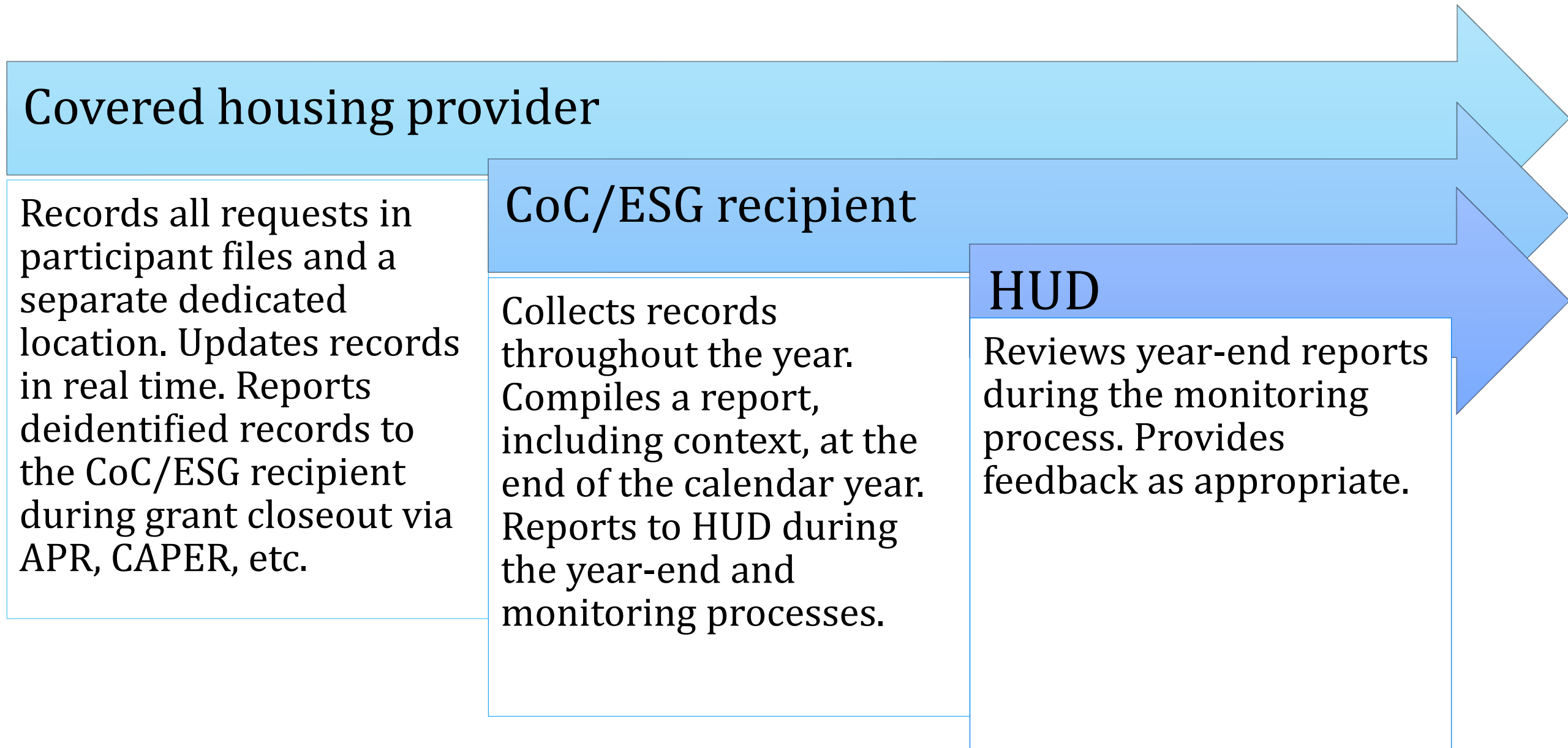
Implementing the ETP: Training Partners



Implementing the ETP: Training Intervals



Implementing the ETP: Tracking and Reporting





Eligible Costs

Implementing the ETP: Eligible Costs (CoC)

CoC Planning

- Developing an ETP
- Training CoC members on implementing ETP requirements
- Developing an ETP outcome tracking and reporting process
- Monitoring ETP requests and outcomes
- Reporting on ETP outcomes, including to CoC members and HUD

HMIS

- *For providers:* costs associated with recording and reporting on ETP outcomes via HMIS; potentially, staff costs of attending training on ETP outcome tracking and reporting
- *For HMIS Leads:* developing an ETP outcome tracking and reporting infrastructure; training providers on ETP outcome tracking and reporting; reporting on ETP outcomes

Other Budget Lines

- *Administrative costs:* monitoring and reporting on ETP requests and outcomes; potentially, staff costs of attending ETP training
- *Rental Assistance:* the cost of breaking a tenant-based rental assistance lease in response to an ETP request

...and the VAWA BLI as discussed in our last session with CSB!

Implementing the ETP: Eligible Costs (ESG)

Administrative Activities

- Developing an ETP
- Training ESG subrecipients on implementing ETP requirements
- Developing an ETP outcome tracking and reporting process
- Monitoring ETP requests and outcomes
- Reporting on ETP outcomes to HUD
- Potentially, staff costs of attending ETP training

HMIS

- *For providers:* costs associated with recording and reporting on ETP outcomes via HMIS; potentially, staff costs of attending training on ETP outcome tracking and reporting
- *For HMIS Leads:* developing an ETP outcome tracking and reporting infrastructure; training providers on ETP outcome tracking and reporting; reporting on ETP outcomes

Housing Relocation & Stabilization Services

- *For participants receiving short- to medium-term rental assistance under ESG Homelessness Prevention or Rapid Re-Housing:* the cost of breaking a lease in response to an ETP request; these costs are not subject to the 24-month limit on rental assistance



Q&A

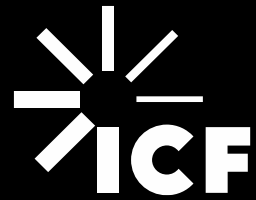
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