Greater Richmond Continuum of Care

Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

**Emergency Transfers**

If a HUD CoC- or VHSP-funded Rapid Rehousing (RRH), Permanent Supportive Housing (PSH), Emergency Shelter (ES), or Transitional Housing (TH) provider (hereinafter referred to as the Housing Provider or HP) is concerned about the safety of a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, the provider should follow the procedures outlined in this Emergency Transfer Plan (ETP). The YWCA is the coordinating agency (CA) for the GRCoC’s ETP.

In accordance with the Violence Against Women Act (VAWA),[[1]](#footnote-2) the ETP allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant’s current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.[[2]](#footnote-3) The ability of the CA to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on available resources to offer safe, temporary accommodations provided by the CA. The HP will continue to provide case management, including housing search and navigation to locate and secure a new RRH or PSH unit or an appropriate shelter bed.

This ETP identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security.

**Eligibility for Emergency Transfers**

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD’s regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section. In cases where eligibility may be in question, the community may rely on case conferencing.

**Emergency Transfer Request Documentation**

A tenant may request an emergency transfer by either contacting the Empower Net hotline directly or notifying their HP case manager, who will then contact the Coordinated Entry System (CES) team to coordinate the transfer. The CA will provide reasonable accommodations to this policy for individuals with disabilities. The ETP request form should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under HP’s program; OR

2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises

**Confidentiality**

The CA and HP will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives HP written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. The CA and HP will also keep confidential the location of any new unit to ensure the tenant’s safety and will not disclose this information to the person(s) responsible for the violence, except as required by law.

**Emergency Transfer Timing and Availability**

The CA cannot guarantee that a transfer request will be approved or that resources will be available to immediately provide a transfer. However, the CA will process requests as quickly as possible and assist the tenant in identifying safe temporary accommodations if a transfer is delayed due to resource constraints. In situations where no alternative shelter bed is immediately available, a survivor may choose to return to the originating emergency shelter. Any such return will be coordinated during case conferencing with participation from the shelter staff who’s been working with the survivor, Coordinated Entry staff, and the YWCA to ensure continuity of care and survivor-centered safety planning.

**Rehoused Unit**

If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. HP may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If the HP does not have a safe and available unit for which the tenant is eligible, the HP will assist in identifying alternative housing providers that may have suitable units. At the tenant’s request, HP will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

**Safety Planning**

In addition to emergency transfers, tenants who are victims of domestic violence, dating violence, sexual assault, or stalking may need safety planning resources that do not involve relocating to a new unit. The YWCA, acting as the CA, is responsible for ensuring that tenants have access to these resources. Safety planning may include developing a personalized safety plan, assisting with requests for lock changes or other security enhancements such as installing cameras, and connecting tenants to additional resources already offered to survivors by the YWCA. When a survivor is referred from an emergency shelter, safety planning may initially take place at the shelter in coordination with YWCA staff. YWCA will lead this process in partnership with the shelter to ensure alignment with survivor needs and ongoing support plans.

**Safety and Security of Tenants**

While awaiting a transfer, tenants are encouraged to take precautions for their safety, including contacting local victim services for additional support. Tenants may reach out to the Empower Net Regional Hotline at 804-612-6126 for immediate assistance.

**Agency Responsibilities regarding the ETP**

Housing-focused case management is primarily provided by the HP agency staff. However, when a survivor is referred from an emergency shelter, the YWCA will assume responsibility for providing housing-focused case management. This support is offered in conjunction with the DV services and other resources already being delivered by the YWCA.

Weekly case conferencing is facilitated by Homeward staff and includes participation from the Coordinated Entry team, YWCA staff, and case managers from the HP agency to ensure collaborative and survivor-centered planning.

1. Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation. [↑](#footnote-ref-2)
2. Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status. [↑](#footnote-ref-3)