

Housing for Health System of Care Transfer Policy

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1. Introduction

This policy outlines the process for people being served by housing programs within the Housing for Health System of Care (“H4H System”) to transfer from one program to another. This policy applies only to transfers between housing programs that receive referrals through the H4H Coordinated Entry System. It establishes the required steps for reviewing, approving, and completing transfer requests for households enrolled in housing programs that receive referrals through the Coordinated Entry System operated by the County of Santa Cruz Human Services Department Housing for Health Division (“H4H Division”).

Housing programs within the H4H System are expected to be client-focused and tailored to each household's unique needs and interests. Program transfers are therefore expected to be rare and are appropriate only when a household’s needs, safety, or circumstances change or when the full scope of the household’s needs becomes apparent over time in a way that cannot be reasonably addressed within the current housing program.

Permanent housing resources within the H4H System are extremely limited. Housing providers and participants must make sustained, documented efforts to stabilize the household within the current housing program before requesting a transfer. Submitting a transfer request does not guarantee approval, and approval does not guarantee immediate placement into another housing program.

2. Definitions

Chronic Homelessness: As defined by the [US Department of Housing and Urban Development \(HUD\)](#), chronic homelessness applies to individuals and families with a disabling condition who have been homeless for at least 12 consecutive months, or who have experienced homelessness on at least four separate occasions in the past three years that together total at least 12 months. To qualify, the person (or head of household for families) must be living in a place not meant for human habitation, in an emergency shelter, or in a safe

haven. A "break" in homelessness is defined as seven or more consecutive nights. Stays in institutional care facilities of less than 90 days do not count as a break.

Coordinated Entry System: The system of program access, needs assessment, and prioritization developed by a Continuum of Care pursuant to [24 CFR 576.400 \(d\)](#), and associated HUD requirements and guidance [24 CFR 578.7\(a\)\(8\)](#) and [CPD Notice 17-01](#).

Housing for Health System of Care: The set of programs, funding, activities, and coordination that is specifically intended to address the needs of people experiencing or at-risk of homelessness in Santa Cruz County.

Housing Queue: A list of households maintained in the Homeless Management Information System (HMIS) that have indicated an interest in one or more types of housing resources and have been assessed and prioritized for such resources. The Housing Queue contains key information about the household that is used to match them to available and anticipated housing resources.

Permanent Supportive Housing (PSH): Defined by HUD in 24 CFR 578.3 as permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

. The State of California further defines PSH in Health and Safety Code § 50490 and § 50675.14 as permanent housing with no limit on the length of stay that is occupied by the target population and that is linked to onsite or offsite services that assist the supportive housing residents in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Permanent Supportive Housing includes associated facilities if used to provide services to housing residents.

Project Type: The category of housing or service intervention for people experiencing homelessness, including Transitional Housing, Permanent Supportive Housing, Rapid Rehousing, and Outreach as defined by HUD, the State of California, or other funders. ,

Rapid Rehousing (RRH): Provides housing relocation and stabilization services and short- and/or medium-term financial assistance as necessary to help individuals and families experiencing literal homelessness move quickly into permanent housing and achieve stability in that housing, as defined by HUD at 24 CFR 576.104. The State of California's Emergency Solutions Grant (ESG) and Homeless Housing, Assistance and Prevention (HHAP) programs use HUD's definition of Rapid Rehousing.

Reasonable Accommodation: A modification or adjustment to a program, service, or environment that enables a person with a disability to participate fully and equally, as required under the Fair Housing Act, Section 504 of the Rehabilitation Act.

Transfer: The movement of a household from one housing program to another housing program that receives referrals through the Coordinated Entry System, initiated through a formal transfer request and subject to review, approval, and housing availability.

Transfer Request: A formal request, submitted through the Coordinated Entry System, to move a household from one Coordinated Entry-referred housing program to another due to changes in household needs, safety, accessibility, household composition, or program capacity, as defined in this policy.

3. Transfer Request Policy Scope and Purpose

This policy focuses on transfers between programs. Coordinated Entry-referred housing programs often support clients to transition from one housing *unit* to another housing unit while remaining enrolled in the same program. Transitions between housing *units* are not covered by this policy, unless those transitions also involve a change in program enrollment.

This policy incorporates relevant federal and state guidance and requirements including:

- HUD Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System ([CPD-17-01](#))
- Continuum of Care Program Regulations ([24 CFR 578](#))
- Emergency Solutions Grant Program Regulations ([24 CFR 576](#))
- Fair Housing Act regulations ([24 CFR 100](#))
- Violence Against Women Act Emergency Transfer Requirements ([24 CFR 5 Subpart L](#))
- California Fair Employment and Housing Act ([Government Code §12900-12996](#))

3.1 Purpose

The purpose of this policy is to establish clear standards for when and how transfer requests may be considered, ensuring that transfers occur only when necessary, are reviewed consistently, and prioritize safety, accessibility, and housing stability while preserving limited permanent housing resources within the H4H System of Care.

3.2 Applicability

This policy applies to H4H Division staff, housing providers receiving Coordinated Entry referrals, and households enrolled in Coordinated Entry-referred housing programs.

3.3 System Context

This policy functions within the broader H4H System which is guided by the System Wide Standards, an overarching set of system policies and expectations, and the [Housing for Health Coordinated Entry Policies](#).

4. Transfer Requests

This policy defines various types of transfer requests, summarized in the following table.

Transfer Type	Initiator	Applicable Circumstance	Project Type Restriction
Service Need Transfer	Enrolled Household	Household requires level/intensity/type of assistance that current program	May cross project

Transfer Type	Initiator	Applicable Circumstance	Project Type Restriction
		cannot provide despite sustained engagement and service adjustments	types (e.g., RRH → PSH)
Safety Transfer	Provider	Reasonable belief that the household, or certain members within the household face a specific threat of harm, such as violence, abuse, or exploitation directed at the household, and relocation within the current program is not feasible or sufficient to address that threat.	Same project type only
Accessibility Transfer	Provider	Disability-related needs that cannot be reasonably accommodated within existing program	Same project type only
Household Composition Transfer	Provider	Change in household composition creates imminent lease compliance issue that cannot be resolved through relocation within current program	Same project type only
Program Disruption Transfer	H4H / Provider	Program can no longer serve household(s) due to funding loss, reduction, expiration, or program closure	Same project type only

This section describes the types of transfer requests that may be submitted through Coordinated Entry and the processes used to review, prioritize, and implement approved transfers.

Submitting a transfer request does not guarantee approval or placement in another housing program. Approval of a transfer request may not result in immediate placement or the provision of interim housing. H4HP is required to take reasonable steps to support participant safety and fair access to housing; however, limited resource availability may delay or prevent alternative placement. H4HP is not required to provide hotel stays, create new housing units, or displace other households to accommodate a transfer. When permanent housing is not immediately available, the current housing provider and participant should continue to explore interim safety or stabilization options outside of CES system resources, but these options do not constitute completion of a transfer. The current housing provider is responsible to make referrals for the participant to appropriate shelter(s), as needed. The provider initiating a transfer remains responsible for supporting the household until the transfer is complete or an interim placement (such as Emergency Shelter) has been established.

All transfer requests must be submitted using the Housing for Health Partnership Transfer Request Form (Appendix A).

4.1 General Transfer Eligibility and Process Requirements

Housing program providers may only submit transfer requests after they have made reasonable efforts to meet the participant's needs within the same program including addressing accommodation requests, and, when needed, stabilize the participant through case management and supports consistent with Section 4.1.1 below. A transfer request may proceed only when these efforts have been exhausted, and the household's circumstances indicate that continued placement in the current housing program is necessary for participant safety, housing stability, and/or continuing to meet tenancy requirements.

Transfer requests must meet **at least one** of the following conditions:

- The household's safety, accessibility needs, or household composition have changed;
- The household's service needs have changed in ways that materially impact housing stability; or
- The housing program's ability to continue serving the household has changed due to funding loss, service reduction, program closure, or similar circumstances.

Transfer requests must be approved by the H4H Division prior to the transfer occurring. Submitting a transfer request does not guarantee approval or placement.

4.1.1 Expectations for Providers

Prior to submitting a transfer request, housing providers are expected to make reasonable efforts to address the household's identified need within the current housing program, when feasible and appropriate. Reasonable efforts may include:

- Relocating the household to a different unit within the same housing program including assisting the household to exit the current lease and secure a different unit through the private rental market while remaining enrolled in the program;
- Exploring reasonable accommodations or modifications consistent with HUD reasonable accommodation and modification guidance; and/or
- Adjusting service delivery, referrals, or supports consistent with the housing program model.

A transfer request may be initiated only when relocation within the current housing program is not possible, not available, or would not adequately address the identified concern, including when:

- Remaining in a site-based property presents an ongoing safety risk;
- The unit or property cannot be reasonably modified to meet accessibility or safety needs; or
- Program design, eligibility criteria, or population served prevent appropriate continued placement.

When a household requests relocation due to safety or accessibility concerns, housing providers must take reasonable steps to relocate the household unless relocation would increase risk to the participant, conflict with the household's stated needs or preferences, or violate federal protections, including protections under the Violence Against Women Act (VAWA).

Housing providers submitting a transfer request form (see Appendix A) must continue to provide services and support to the household, including supporting housing stability and participant safety to the extent possible and assisting with transfer logistics until the transfer is complete or another appropriate interim placement (such as emergency shelter or other safety arrangement) is secured.

4.2 Administrative Transfer Requests

Administrative transfer requests are prioritized due to their direct impact on safety, health, accessibility, or lease occupancy requirements. Consistent with Section 4.1.1, administrative transfer requests may be submitted only when relocation or adjustments within the current housing program are not feasible, not available, or would not adequately resolve the identified concern.

Administrative transfer requests include:

- Safety Transfers
- Accessibility Transfers
- Household Composition Transfers

Administrative transfer requests are permitted only within the same project type, such as Rapid Rehousing to Rapid Rehousing or Permanent Supportive Housing to Permanent Supportive Housing. Administrative transfer requests may not be used to change a household's level of intervention. (Transfers between project types are addressed separately under the service need transfer request.) Approved administrative transfer requests will be prioritized at the top of the Housing Queue, with safety-related transfers receiving the highest priority. When more than one household is prioritized under the same transfer category, the H4H Division will review whether those transfer requests are seeking the same resource, such as the same or similar units of Permanent Supportive Housing or Rapid Rehousing. If not, both households will be prioritized for the next opening available in the responsive project type through the Coordinated Entry System. In instances where more than one transfer has been approved for the same type of resource, priority will be determined by the date the household was originally added to the housing queue from the latest coordinated entry enrollment. If households have the same original queue date, priority will be determined by the date and time the transfer request was approved.

4.2.1 Safety Transfer Request

The H4H System of Care is expected to take reasonable steps to support participant safety. Safety transfers may be requested when a household reasonably believes

remaining in their current unit or housing environment places them at risk of harm. Requests may be based on the household's own statement; third-party documentation is not required. Before initiating a safety transfer request, providers must assess whether the household can be safely relocated within the current housing program, consistent with Section 4.1.1. A transfer request may be initiated when relocation within the program is not feasible or would compromise participant safety.

As a reminder, in accordance with the Violence Against Women Act and [24 CFR 5.2007](#), information that could identify a participant as a survivor of domestic violence, dating violence, sexual assault, or stalking may not be entered into shared systems such as the Homeless Management Information System (HMIS), except as permitted by law or with the participant's written consent.

Examples of safety transfer requests include:

- A participant fleeing domestic violence, sexual assault, stalking, or other threats of harm who reasonably believes they cannot remain safely in their current unit or housing environment;
- Ongoing harassment or threats directed at the household by another tenant or individual associated with the housing site;
- Violence occurring in the housing unit or building that places the household at risk; and
- A household that must relocate to a different neighborhood for safety reasons, including relocation outside of the provider's typical geographic service area.

Safety transfers do not include dissatisfaction with the surrounding neighborhood or neighbors, or general crime that does not specifically target the household.

The H4H Division will review and issue a written response indicating approval, denial, or required next steps within two (2) business days of receipt of a complete safety transfer request, consistent with Violence Against Women Act emergency transfer requirements. Approved requests will be moved to the top of the Housing Queue to be referred to the next available eligible opening. It is important to note that while safety transfer requests receive expedited review, the H4H Division does not have control over when extremely limited housing resources become available on the Housing Queue.

4.2.2 Accessibility Transfer Requests

An accessibility transfer request may be initiated when a household is unable to live safely or stably in their current unit due to disability-related needs that cannot be reasonably accommodated within the existing housing unit or program. (Note that changes in housing units within a single program to address accessibility concerns do *not* require a transfer request.)

Housing providers are required to explore reasonable accommodations and modifications consistent with Fair Housing Act requirements before requesting a

transfer, unless immediate relocation is necessary due to health risks or an immediate disability-related functional need. Accessibility transfer requests do not include accommodation needs that can and should be reasonably addressed through unit modifications, such as installation of grab bars or ramps. If reasonable accommodations cannot resolve the accessibility concern, providers must next assess whether relocation within the current housing program is feasible before requesting a transfer, consistent with Section 4.1.1. Accessibility transfer requests may be appropriate when accommodations cannot reasonably be made, such as:

- A household member requires an elevator or wider doorways for wheelchair access in a building that cannot support these features;
- An additional bedroom is required for a live-in caregiver or essential medical equipment, and there are no units with additional bedrooms available within the development.

Accessibility transfer requests are reviewed by the H4H Division within five (5) business days of receipt of a complete request. If approved, the household is returned to the Housing Queue using the original date they were added to the queue from the latest coordinated entry enrollment and referred to the next available eligible opening within the same project type that would meet accessibility requirements.

4.2.3 Household Composition Transfer Requests

Changes in a household's composition can impact lease requirements and the size of a housing unit required for the household. Household composition transfer requests are permitted only when relocation within the current housing program is not feasible, including relocation to another unit while remaining enrolled in the program.

Examples include, but are not limited to:

- A household that exceeds habitability standard person limits for the unit or lease occupancy limits due to the addition of a family member where lease occupancy standards cannot be negotiated with landlord and relocation within the current program is not feasible;
- A household whose composition changes in a way that conflicts with the population served by the housing program. For example, a participant in a program serving only single adults who regains custody of their children and therefore requires a larger unit and no longer meets the program's eligibility criteria.

Household composition transfer requests are reviewed by the H4H Division within five (5) business days of receipt of a complete request. If approved, the household is returned to the Housing Queue using the original date they were added to the queue from the latest coordinated entry enrollment.

4.3 Service Need Transfer Requests

Service need requests apply when a household's ongoing needs or circumstances indicate that a different housing program would better support housing stability, and the issue cannot be reasonably resolved within the current housing program despite sustained engagement and documented stabilization efforts.

Because permanent housing resources within the H4H System are extremely limited, service need transfer requests are intended to be rare and are subject to structured review to ensure appropriate use of system resources, consistency in decision-making, and alignment with Coordinated Entry and Housing for Health Partnership standards.

Service need transfer requests may be appropriate when one or more of the following apply:

- The household requires a level, intensity, or type of ongoing services that the current housing program cannot reasonably provide, even with sustained housing stability engagement efforts, service adjustments, or referrals;
- The household would be better served by a different Permanent Supportive Housing program due to specialized services, staffing model, service approach, or housing configuration; or
- The household is enrolled in Rapid Rehousing and, despite sustained housing stability engagement efforts, is expected to be unable to maintain housing without ongoing intensive services and long-term rental assistance.

Providers must meet the expectations outlined in Section 4.3.2 prior to submitting a service need transfer request.

4.3.1 Service Need Transfer Request

Service need transfer requests apply when a household requires a level, intensity, or type of housing assistance or services that the current housing program cannot reasonably provide.

Service need transfer requests may result in transfers within the same project type (for example, Permanent Supportive Housing to Permanent Supportive Housing) or transfers across project types, including from Rapid Rehousing to Permanent Supportive Housing, when eligibility criteria are met.

Note that service need transfers are not permitted based solely on insufficient income or difficulty engaging in services without a demonstrated impact on housing stability.

Rapid Rehousing to Permanent Supportive Housing Transfers

Transfer requests seeking an escalation in the support provided to a household require special attention. Before requesting a transfer to a more intensive

housing intervention, Rapid Rehousing providers must consult the Housing for Health Partnership Rapid Rehousing Program manual to ensure that all expectations regarding service intensity, housing-focused engagement, and participant participation have been met prior to requesting the transfer.

Rapid Rehousing to Permanent Supportive Transfer requests must meet all of the following conditions:

- The household met eligibility requirements for Permanent Supportive Housing **at the time of entry** into Rapid Rehousing, including disability status, and meeting the definition of chronic homelessness, when applicable, as [defined by HUD](#) and [24 CFR 578.3](#). Documentation of the participant's eligibility for PSH (disability and chronic homelessness status documentation) must be collected by the provider and submitted with the transfer request form;
- The household has either received Rapid Rehousing services for twelve months or more, or the provider has requested and received approval for consideration of an earlier transfer, as described below;
- Despite sustained engagement and stabilization efforts, the household is expected to be unable to maintain housing without ongoing intensive services and long-term rental assistance; and
- The provider has exhausted reasonable stabilization strategies within Rapid Rehousing as outlined in the Housing for Health Partnership Rapid Rehousing Manual.

If a provider determines that a household has significant service needs after approximately six (6) months of Rapid Rehousing, the provider must present the request and relevant circumstances at a periodic transfer review meeting convened by the H4H Division (see Section 4.3.3. for further details). The presentation must also document the stabilization efforts completed to date and invite suggestions about additional interventions to support housing stability.

Following this review, the group may determine that the provider has exhausted all reasonable stabilization efforts. In those circumstances, the provider may request approval to submit a transfer request prior to the household receiving twelve (12) months of Rapid Rehousing services. Approval of a Rapid Rehousing to Permanent Supportive Transfer request is not guaranteed and must be supported by documentation demonstrating that Permanent Supportive Housing is necessary to prevent a return to homelessness.

4.3.2 Provider Expectations Prior to Submitting a Request

Prior to submitting a service need transfer request, housing providers are expected to demonstrate sustained and reasonable efforts to stabilize the household within the current housing program.

Provider expectations include, but are not limited to:

- Regular and meaningful engagement with the household, as outlined in the Housing for Health Partnership Rapid Rehousing Manual;
- Adjustments to service delivery consistent with program design;
- Coordination with community partners and referrals as appropriate;
- Connections to health care, behavioral health, income, benefits, employment, or other stabilization resources;
- Tenancy education, landlord engagement, or housing problem-solving efforts; and
- Documentation of attempts to resolve grievances or concerns when applicable.

Eviction or receipt of an eviction notice does not automatically qualify a household for a transfer request.

4.3.3 Review and Decision Process

Service need transfer requests, will be reviewed to determine whether:

- The household's needs cannot reasonably be met within the current housing program despite appropriate service efforts; and
- A transfer is reasonably expected to improve housing stability.

The H4H Division will provide first review of service need transfer request to assess if all transfer requirements has been met including review of:

- Services and supports provided to date;
- The household's housing stability and risk factors; and
- Whether additional mitigation steps or supports could reasonably be attempted prior to approving a transfer.

If the request clearly meets transfer requirements and has provided all necessary documentation, H4H Division will approve the transfer request.

If H4H Division determines that a transfer request would benefit from review and suggestions from a wider group, the transfer will be submitted by H4H for review to a standing transfer review panel composed of an odd number of members, including H4H Division staff, housing providers not associated with the request, and people with lived experience. The referring provider may not participate in deliberations. For

service need transfers from Rapid Rehousing that occur before 12 months, the case must always be presented to the transfer review panel.

H4H Division or the transfer review panel may request additional information or documentation from the requesting provider before making a determination.

Possible outcomes of H4H Division or transfer review panel review include:

- Approve the transfer request;
- Deny the transfer request;
- Request additional information related to the request; or
- Identify specific actions or service steps that must be completed before the request will be reconsidered.

Service need transfer requests are reviewed monthly unless expedited due to service need concerns that are causing imminent housing stability concern.

If approved, the household is returned to the Housing Queue using the original date they were added to the queue from the latest coordinated entry enrollment.

4.4 Program Disruption Transfer Request

Program Disruption transfer requests apply when a housing program is no longer able to serve enrolled households due to funding reduction, loss, program closure, or similar issues.

4.4.1 Program Level Review and Assessment

When a program disruption due to funding loss, reduction, program closure or similar issues occurs, the H4H Division will conduct a program-level and household-level review. (Depending on the nature of the disruption and operating status of the provider, the provider may or may not be able to participate in that review.) This review is intended to identify the most appropriate housing options to address the support needs of impacted households.

This review will include:

- Information on all impacted households, including household income, housing stability, and service needs; and
- Assessing housing and subsidy resources and service opportunities outside of the H4H System, which may include housing authority-administered rental assistance, affordable housing opportunities, or other non-system options.

4.4.2 Permanent Supportive Housing Programs

The H4H Division will work to identify long-term housing options for participants of impacted PSH programs that align with household needs. The H4H Division will explore options outside of the H4H System prior to returning households to the Housing Queue.

If no appropriate alternatives are identified, the household may be returned to the Housing Queue using the original date they were added to the queue from the latest coordinated entry enrollment for referral to new Permanent Supportive Housing opportunities.

4.4.3 Rapid Rehousing Programs

The H4H Division will assess the housing and service needs of participants of impacted RRH programs including:

- Which households are expected to remain enrolled when programming or funding ends;
- Whether alternative resources can extend assistance through the intended program duration; and
- Whether intensified services could support stabilization and planned exit.

When households cannot be stabilized and no alternatives exist, the household may be returned to the Housing Queue using the original date they were added to the queue from the latest coordinated entry enrollment for referral to new Rapid Rehousing Housing opportunities.

5. Policy Location

[Link to the policy Housing for Health Partnership Policy and Procedure webpage.](#)

6. Appendix

Transfer Request Form (Appendix A)

6.1 Cross References and Resources

Coordinated Entry Policies and Procedures

Rapid Rehousing Program Manual

HUD Reasonable Accommodation and Modification Guidance

Systemwide Standards

Coordinated Entry Notice, Notice CPD 17 01

Continuum of Care Program Regulations, 24 CFR 578

Emergency Solutions Grant Program Regulations, 24 CFR 576

Fair Housing Act regulations, 24 CFR 100

Violence Against Women Act Emergency Transfer Requirements, 24 CFR 5 Subpart L

6.2 Other Supporting Content

Contextual materials such as glossaries, flowcharts, visual aids and links to forms or resources that accompany the policy.

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