



## CAS Transfer Policy Changes Memo Policies & Procedures Revision

**Purpose:** This memo outlines changes to the Coordinated Assessment System (CAS) Process and Procedures. The changes outlined in this document describe the revisions to the policy for participant households in permanent housing programs to transfer to another CoC funded program in CAS.

**Background:** The Coordinated Assessment System (CAS) seeks to prevent and reduce the number of people who are exited back to homelessness. To accomplish that, CAS must provide flexibility to programs and households to transfer between program types to better meet the needs and preferences of a household. A key component to any transfer process is an on-going assessment of a household to determine whether the levels of service are appropriate, need to increase, or be reduced. Transfers between programs occur when a participant needs to move from one program or project to another. A variety of reasons may exist for a participant to transfer, but the priority is to keep the participant stably housed. Transfers are a “net zero” for the housing system, as a participant leaves a program spot open once he or she moves into the new housing opportunity. The CAS Committee convened on June 1, 2021 to discuss critical changes to the current transfer policy effective September 2020. Specifically, the need for increased flexibility to ensure assistance is structured and provided in a way that appropriately meets the household needs when it is determined the current intervention is not adequate to stabilize the household.

**Proposed Changes:** Dallas and Collin County CoC’s program transfer policy is focused on providing a flexible strategy to structure assistance to meet a household needs and employing on-going, progressive assessment to determine those needs. The new policy defines the requirements for transferring between the same program type, to different CoC funded program types, and for emergency transfers. To support this, the CAS workgroup recommended the creation of a Staffing Workgroup to review and approve transfer requests and promote transparency in the process.

**Policy:** It is the policy of the Dallas and Collin Co CoC that a progressive engagement transfer process should be piloted to ensure people in need assistance the most can receive it in a timely manner. In the cases when a type of housing intervention is found to no longer meet the needs of the participant household post-program entry, the existing service agency will coordinate with the Staffing Workgroup to facilitate a request in current housing accommodation via CAS transfer. **All transfer requests will be reviewed in a community setting via the Staffing Workgroup.** The group will critically review the transfer request and decide on whether the agency has exhausted all other options and that a transfer is the most appropriate next step for the household. When applicable, the group will brainstorm with the agency on alternative solutions. The approval process employed by the Staffing workgroup for transfer requests will vary depending on the reason identified for transfer. Transfer due to fleeing or experiencing violence of accessibility to maintain a unit in the community will be prioritized above all other transfer and will have the fastest resolution possible.



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Prior to submitting a transfer request, Housing program staff are required to utilize the weekly HPL meetings to case conference issues and make attempts to resolve without use of a transfer. The service agency initiating the transfer must provide the service agency receiving the transfer the required eligibility documentation to include Verification of Disability (if applicable), Certificate of Homelessness and/or supporting homeless documentation, and/or any other critical documents for housing (i.e., government identification, income documentation, etc.). The receiving service agency is responsible for verifying that the documentation is valid and complete for record keeping purposes. By accepting the referral, the receiving organization assumes all responsibility for providing documentation of eligibility if requested by HUD. If the receiving organization agrees to work with the household, the transfer will not be considered complete until the household is approved and moved into the program, and the changes reflected in HMIS. If the individual or household exits the initial project before the transfer is completed, they will be re-assessed and must meet applicable project eligibility criteria at the time a bed becomes available.

The type of transfers that may be requested and the program types eligible for transfers are detailed below. **All transfers must be facilitated through the CAS process. Housing programs shall not initiate transfers between providers without the involvement and permission from the CAS Admin and approval from the Staffing Workgroup.**

### Transfers between same program type (PSH to PSH or RRH to RRH)

Transfers should be reserved for grievance issues that are not able to be resolved within current program and/or violation of program rules at the current service agency due to program termination for physical or verbal violence against staff. When a transfer from a is deemed necessary and approved by CAS Staffing Workgroup, the transfer request will be prioritized over other households on the Housing Priority List (HPL) upon approval. Transfer requests must be submitted by the current service agency and communicated via Spiceworks or the HPL meetings to the CAS Admin prior to submitting the request to the Staffing Workgroup. Approved transfers will be processed in a timely manner but may be affected by housing availability.

### Transfers from RRH to PSH

Transfers from RRH to PSH programs should be an option of last resort. Service agencies should identify and exhaust all other options outside of CoC Programs prior to requesting a transfer. Service agencies must document in HMIS the attempts and methods for securing alternative resources to support housing stabilization to include providing program extensions (if applicable), alternative housing accommodations (i.e., shared housing or boarding homes), and referral to mainstream and/or natural family supports.



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Transfers from a RRH program to a PSH program are allowable if the household met all requirements for chronic homelessness when entering the RRH program. Households do not accrue time toward chronic homelessness while enrolled in the RRH program.

When a transfer from a RRH program to a PSH program is deemed necessary and approved by CAS Staffing Workgroup, the transfer request will be prioritized over other households on the CAS Housing Priority List (HPL) upon approval. However, the Staffing Workgroup reserves the right to utilize referral ratios for prioritization of transfer referrals vs participants prioritized on the HPL to ensure participants waiting to be referred are not excluded or limiting housing options. Transfer requests must be submitted by the current service agency and communicated via Spiceworks or the HPL meetings to the CAS Admin prior to submitting a request to the Staffing Workgroup. Approved transfers will be processed in a timely manner but may be affected by housing availability.

### Emergency Transfers for Victims of Domestic Violence

In compliance with the Violence Against Women Act (VAWA), the CAS allow emergency transfers for households that are victims of domestic violence, dating violence, sexual assault, or stalking. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. HUD 24 CFR Part 5 states that a household qualifies for a VAWA emergency transfer when the household requests a transfer, reasonably believes there is a threat of imminent harm from further violence if the household remains in the same unit, or a sexual assault occurred on the property within 90 days preceding the emergency transfer request. When an emergency transfer is deemed necessary, the current service agency will communicate via Spiceworks or the HPL meetings to the CAS Admin prior to submitting a request to the Staffing Workgroup. The transfer request will be processed as quickly as possible. In the meantime, the program will evaluate the need for an internal transfer to a new unit based on need and availability.

### **Process:**

#### Communication

The service agency requesting a transfer to another CoC funded program in CAS will complete the Transfer Request Template Form and submit to the Staffing workgroup for consideration for approval. Prior to submitting a Transfer Request Template Form, Housing program staff are required to utilize the weekly HPL meetings to case conference issues and make attempts to resolve without use of a transfer.

#### Transfer Request Protocols

To complete a transfer request, the following must be steps must be completed and information submitted in full prior to a determination being made.



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- 1) Agency staff identifies the need for transfer to another CoC funded program
- 2) Agency staff utilizes weekly HPL meeting to discuss the reason for potential transfer and case conference possible solutions in lieu of program transfer
- 3) If the issue is not resolved, the agency staff request the Transfer Request Template Form from CAS Admin via Spiceworks
- 4) Agency staff collects all relevant eligibility documentation and uploads in the client's profile in HMIS
- 5) Agency staff completes the Transfer Request Template Form and submits to CAS via email
- 6) CAS Admin submits the Transfer Request Template Form to the Staffing Workgroup members for review
- 7) Once the Transfer Request Template Form is submitted to the Staffing Workgroup, members will review the information within 48 hours to make a decision on approval or denial of the request.
  - a. In some circumstances, the Staffing Workgroup may request a follow up meeting with the agency staff to discuss relevant details prior to making a decision.
  - b. The agency submitting the transfer request must be present at the meeting when this is discussed.
- 8) Once a decision is determined, the CAS Admin will update the HPL based on the recommendations made by the Staffing Workgroup.