



**COVID-19**

## **Homeless System Response: Program Transfer Considerations for Households in ESG-CV Rapid Re-Housing Programs**

While the Emergency Solutions Grant, funded by the Cares Act (ESG-CV), is only available until September 30, 2022, communities are strongly encouraged to continue housing households experiencing homelessness using rapid re-housing, as housing is the most effective way to end homelessness, reduce the risk of COVID-19 infection and transmission, and to maximize the impact of ESG-CV funds.

This document explores how to plan for program transfers in situations where households will need rental assistance and/or supportive services at the end of the ESG-CV expenditure period. In addition to understanding the options for transfers, the reader should understand that a program transfer should not be a transactional experience for program participants. Next steps for the household should integrate client choice to the maximum extent possible, and care and consideration should be given to reduce any potential harm that could result from a program transfer.

Communities that do not have an established policy and process for rapid re-housing transfers should establish one, in partnership with people who have lived experience of homelessness, to ensure that information about the reason for the transfer and any necessary documentation is captured in the household's case file, and that the process is clear and person-centered. [This resource](#) provides guidance and best practices in engaging those with lived experience in your work.

### **Program Transfer Strategies Should Focus on Households Who Will Need Longer-Term Assistance or Who Are Moving into Housing through Rapid Re-Housing Close to The Expenditure Deadline of September 30, 2022**

If it becomes clear, despite the financial assistance and services offered through ESG-CV rapid rehousing, that the household will need more assistance, or if the household is just beginning their participation in the rapid re-housing project near the end of the expenditure period, it may be necessary to transfer that household to another program when the ESG-CV assistance is no longer available.

In many cases, the transfer will require the household to be assigned to a new program and/or case manager. This can be traumatic to individuals or families who have established a rapport with their current service provider. A warm, well-coordinated transfer, and staff training on cultural humility can help address this trauma and ensure tenants are supported during this uncertain time. Refer to [this document](#) for additional considerations to ensure services are trauma-informed. Regardless of what program the household is transferred to, care should be taken to ensure the process honors client choice and minimizes the harm and disruption to the individual or family receiving services.

### **Establish a Thoughtful, Communitywide Plan for Transfers from Rapid Rehousing that Strategically Utilizes Available Resources**

Communities must begin planning as soon as possible to avoid leaving households with gap in rental assistance. While available federal resources provide several sustainable options, pre-planning with relevant partners is essential to a smooth transition from ESG-CV rapid re-housing. In addition, being transparent about the ESG-CV expenditure deadline, and the plan to transfer the household to another form of assistance can help reduce the stress and uncertainty that may occur for the program participant.

### **Special Circumstances and Eligibility Considerations When Planning for Program Transfers from ESG-CV Rapid Re-Housing**

#### ***Program Eligibility***

Households who are receiving rapid re-housing assistance maintain their homelessness status for the purpose of eligibility to other programs that require a household to be literally homeless. See more detail [here](#). However, depending on the program, additional eligibility criteria may apply, and have been outlined below.

## Potential Programs to Consider for Transfers from ESG-CV Rapid Re-Housing

The chart below provides a list of potential transfer options, eligibility considerations and suggestions/questions for community discussion as you explore next steps for households in ESG-CV rapid re-housing who will need assistance after September 30, 2022.

Transfer to	Process Notes	Community Considerations
<p><b>Annual ESG Rapid Re-housing</b></p>	<p><i>Transferring a participant from ESG-CV to ESG would not require a new intake or eligibility assessment and would not trigger the re-evaluation requirement. If the participant has not yet received the maximum amount of rental assistance allowed and is not due for a re-evaluation, the ESG-CV rapid re-housing participant would continue to be eligible for ESG rapid re-housing and could immediately be transferred into an ESG rapid re-housing grant. Please note that the waivers and additional eligible activities for FY20 and earlier ESG funds expire on September 30, 2022.</i></p>	<ul style="list-style-type: none"> <li>• Identify all other ESG rapid re-housing programs</li> <li>• Consider whether ESG rapid re-housing programs have sufficient ESG funding to provide for the volume of participants whose ESG-CV assistance is ending and who need additional rapid re-housing assistance</li> <li>• If the participant needs to complete a re-evaluation soon, determine whether the participant would still meet ESG eligibility</li> <li>• Determine if the participant is close to reaching the maximum of 24 months of ESG rental assistance during any 3-year period, and therefore would not be eligible for further ESG-funded assistance</li> <li>• Confirm that the program/transfer process will be able to provide continuous ESG assistance in moving from ESG-CV to ESG (Consecutive rental assistance is not required)</li> <li>• If the participant already exited from the ESG-CV program the rapid re-housing program would need to conduct a complete ESG eligibility/intake assessment</li> <li>• Based on household status/assessment, explore whether additional rapid re-housing assistance seems like the best resource to ensure housing stability</li> </ul>
<p><b>Permanent Supportive Housing (PSH) through the Continuum of Care (CoC) Program</b></p>	<p><i>The community should have an assessment process to help determine if the household needs a PSH level of services. If such a process does not exist or need to be revised, the community should move forward in a way that centers equity and fully integrates those with lived expertise into the decision-making process.</i></p> <p><i>Eligible ESG-CV rapid re-housing households would need to have a disability that would qualify them for PSH.</i></p> <p><i>If the PSH project is dedicated to households experiencing chronic homelessness, the participant must meet specific criteria. Time spent in the ESG-CV rapid re-housing unit would count as a break in homelessness if it is at least 7 nights, and the time would not count towards the length of time that is required to be considered chronically homeless.</i></p>	<ul style="list-style-type: none"> <li>• CoCs should be aware of their monthly PSH vacancy rate to project the likely amount of PSH availability</li> <li>• If the community does not have a transfer policy in place to move a participant from rapid re-housing to PSH, one should be created</li> <li>• The community should outline what participants will be targeted for this limited resource</li> <li>• The community should consider whether the unit the participant currently resides in will meet HQS, or if the participant needs to move</li> <li>• If the PSH project is dedicated to households experiencing chronic homelessness, confirm that the household would qualify</li> </ul>

Transfer to	Process Notes	Community Considerations
<b>Emergency Housing Vouchers (EHVs)</b>	<i>EHV vouchers that turnover can be leased up through September 30, 2023.</i>	<ul style="list-style-type: none"> <li>• Consider the original number of vouchers awarded and remaining available vouchers</li> <li>• Determine what rapid re-housing participants are part of a CoC prioritized population for EHVs</li> <li>• For eligible participants, consider whether the rapid-rehousing landlord is willing to change to an HCV-compliant lease agreement</li> <li>• Determine if the unit the participant currently resides in meets HQS, or if the participant will need to move</li> <li>• If the participant also needs services to continue, determine if community paired services with EHVs or other community-based services are available to meet the need and if the participant is comfortable transitioning to services with that organization</li> </ul>
<b>Housing Choice Vouchers (HCVs)</b>		<ul style="list-style-type: none"> <li>• Assess whether any public housing agencies in the community have HCVs readily available through a preference or set-aside</li> <li>• Consider whether the rapid-rehousing landlord is willing to change to an HCV-compliant lease agreement</li> <li>• Determine if the unit the participant currently resides in meets HQS, or if the participant will need to move</li> <li>• If the participant also needs services to continue determine if there are community paired services with HCVs or if other community-based services are available to meet the need and if the participant is comfortable transitioning to services with that organization</li> </ul>
<b>Annual HOME Tenant Based Rental Assistance (TBRA)</b>	<i>HOME TBRA can provide security deposit assistance or contracts for monthly rental assistance payments for up to 24 months (contracts are renewable beyond the 24 months).</i>	<ul style="list-style-type: none"> <li>• First, determine whether your community has HOME TBRA program or whether one can be set up. <a href="#"><u>Steps to set one up located here.</u></a> If there is an existing HOME TBRA program, the Participating Jurisdiction (PJ) current program’s rules around preferences, income limits, rent reasonableness, etc. must be followed or the PJ must follow HUD guidance to make changes</li> <li>• Determine the maximum term and maximum subsidy of the rental assistance contract, and whether that is enough assistance for the participant</li> <li>• Determine if the unit the participant currently resides in meets HQS, or if the participant will need to move</li> <li>• If the participant also needs services to continue determine if there are community paired services with TBRA or if there are other community-based services are available to meet the need and if the participant is comfortable transitioning to services with that organization</li> </ul>

Transfer to	Process Notes	Community Considerations
<b>HOME-American Rescue Plan (ARP) Tenant Based Rental Assistance (TBRA)</b>	<p><i>HOME-ARP TBRA can provide security deposit assistance or contracts for monthly rental assistance payments for up to 24 months (contracts are renewable beyond the 24 months). <a href="#">HOME ARP allocations can be found here.</a></i></p> <p><i>Previously homeless households housed with temporary assistance such as rapid re-housing are identified as a qualifying population for HOME-ARP.</i></p>	<ul style="list-style-type: none"> <li>• Determine whether the Participating Jurisdiction (PJ) has established a population preference for HOME-ARP, and if the participant fits into that preference</li> <li>• Review the PJs allocation plan to see if they have decided to fund TBRA with HOME-ARP funds</li> <li>• Determine the maximum term and maximum subsidy of the rental assistance contract, and whether that is enough assistance for the participant</li> <li>• Determine if the unit the participant currently resides in meets HQS, or if the participant will need to move</li> <li>• If the participant also needs services to continue, determine if there are community paired services with TBRA or if there are other community-based services available to meet the need and if the participant is comfortable transitioning to services with that organization</li> </ul>
<b>Community Development Block Grant (CDBG) or Community Development Block Grant CARES Act (CDBG-CV)</b>	<p><i>CDBG allows for an additional 6 months of rental assistance, often referred to as emergency grant payments or subsistence payments. CDBG-CV funds are available for 6 years after signing the grant agreement. More information <a href="#">here.</a></i></p>	<ul style="list-style-type: none"> <li>• Determine whether rental assistance is identified as a CDBG or CDBG-CV activity and if a program is currently operational</li> <li>• If the participant will need services to continue, determine what community-paired services with CDBG or other community-based services are available to meet the need(s) and if the participant is comfortable transitioning to services with that organization</li> </ul>
<b>Dept of Treasury Emergency Rental Assistance (ERA) 2</b>	<p><i>Rental assistance up to a monthly maximum of 100% of FMR or Small Area FMR may only be provided for three months at a time up to a maximum of 18 months of assistance. ERA2 funds expire on September 30, 2025. <a href="#">ERA2 allocations can be found here.</a></i></p>	<ul style="list-style-type: none"> <li>• Confirm the participant meets the eligibility criteria for ERA2</li> <li>• If you believe the participant need more than 18 months of additional assistance, this might not be the right fit</li> <li>• If the participant needs ongoing services, you should locate services, if provided through ERA, or other community services available to meet the need and if the participant is comfortable transitioning to services with that organization</li> </ul>
<b>Dept of Treasury American Rescue Plan Act (ARPA) Coronavirus State &amp; Local Fiscal Recovery Funds (CSFRF/CLFRF)</b>	<p><i>Eligible activities include rental assistance and housing stability services that enable eligible households to maintain or obtain housing. These funds must be expended by December 31, 2026. State allocations can be found <a href="#">here</a>, Territory allocations can be found <a href="#">here</a>, County allocations can be found <a href="#">here</a>, and Metropolitan cities allocations can be found <a href="#">here</a>.</i></p>	<ul style="list-style-type: none"> <li>• First, determine whether your community has decided to use its ARPA CSFRF/CLFRF funds for rental assistance and housing stability services, if funds are available, and whether the participant would meet the program criteria</li> <li>• If ongoing services will be required to support the participant, those services should be identified, either through ARPA CSFRF/CLFRF, or an alternative source/provider, and a warm handoff to those services should be ensured</li> </ul>

## ESG-CV Waivers and Flexibilities

[Notice CPD-21-05](#), issued on April 14, 2021, provided waivers and alternative requirements that are relevant to consider as communities begin resource planning for the ESG-CV expenditure deadline. If your local ESG recipient amended their consolidated plan to expand the scope of rapid re-housing beneficiaries for ESG to include individuals and families who were experiencing homelessness and receiving assistance from other sources, those households would also maintain their homelessness status for the purpose of a program transfer, so long as the ESG recipient followed all the guidance provided in CPD-21-05. Any questions regarding eligibility should be directed to the [HUD Ask a Question Desk](#).

## Accurately Capturing Transfers in the Homeless Management Information System (HMIS) System

Different methods for transferring participants from project to project are identified in the [Grant Consolidation and Closing Projects: How to handle client data in HMIS](#) document. Communities should note that when exiting a participant, their destination is about where they are staying, not necessarily about *why* they are staying there. The destination will depend on the specifics of the situation, but it is important to select a destination response category that reflects the true nature of the situation. Similarly, when enrolling a participant into the project they are transferring into, the participant's *Prior Living Situation* as recorded in data element 3.917 would also reflect the true nature of the situation.

**Housing Move-In Date** should be recorded once per enrollment. The purpose of this data element is to accurately differentiate between participants in permanent housing projects who are homeless from those who are housed at any given point in time. In the instance of a permanent housing transfer, the housing move-in date would *stay intact as recorded* for the first project enrollment and would *match the project start date* for the subsequent project enrollment.

When participants transfer from one permanent housing project to another HMIS data collection requirements may not perfectly align.

Data entry in HMIS should comport with the instructions provided in the [HMIS Data Standards Manual](#). In instances such as these, please use the notes sections of various required reports to explain the situation and maintain appropriate documentation in the participant file to explain the apparent discrepancy should a need arise to explain it.