**St. Louis County Continuum of Care (CoC)**

**VAWA Update to SLC Written Standards for Prioritizing Assistance 2023**

**DOMESTIC VIOLENCE/PRIVACY POLICIES**

Per HUD and Violence Against Women Act (VAWA) guidelines, policies around the specific needs of those fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking are maintained.

In addition to access to services, including shelter and hotline support, designed specifically for survivors of domestic violence and trafficking, the CoC maintains an emergency transfer policy as outlined in the Written Standards.

**KEEPING SURVIVORS IN THEIR HOMES**

SLC CoC prioritizes keeping survivors in their homes whenever possible and desired by the survivor. This means connecting survivors to legal resources, advocates, and any other resources needed for survivors to be able to stay in their homes and have those perpetrating abuse leave the home. If this is not desired by the survivor or possible for the survivor, SLC CoC will then follow the following policies and procedures to support survivors of violence, abuse, exploitation, and stalking in moving through homelessness quickly and safely.

**EMERGENCY TRANSFERS**

An Emergency Transfer Plan provides for emergency transfers for survivors of domestic violence receiving rental assistance or residing in units subsidized under a covered housing program (including CoC- and ESG- funded programs).

**A. Emergency Transfer Plan**

A CoC or ESG program participant qualifies for an emergency transfer if:

1. The program participant is a survivor of domestic violence, dating violence, sexual assault or stalking;

2. The program participant expressly requests the transfer; and

3. Either:

a. The program participant reasonably believes there is a threat of imminent harm from further violence if the program participant remains in the same dwelling unit; or

b. If the program participant is a survivor of sexual assault, the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for transfer.

**B. Emergency Transfer Process**

A CoC or ESG program participant may submit an emergency transfer request directly to program staff. The program must communicate with the Coordinated Entry System Manager to inform them that an emergency transfer request has been made and whether the request is for an internal transfer (a transfer where the program participant would not be categorized as a new applicant), external transfer, or both. A program participant may seek an internal and external emergency transfer at the same time if a safe unit is not immediately available. The program will take reasonable steps to support them in securing a new safe unit as soon as possible and a transfer may not be necessary.

Programs will ensure strict confidentiality measures are in place to prevent disclosure of the location of the program participant’s new unit to a person who committed or threatened to commit an act of domestic violence, dating violence, sexual assault, or stalking against the program participant.

Where a family separates as part of the emergency transfer, the family member(s) receiving the emergency transfer will retain the rental assistance when possible. The program will work with the CoC and the household to support an effective transfer in situations where the program is not a good fit for the family member(s) receiving the emergency transfer.

**C. Internal Transfer**

Where a program participant requests an internal emergency transfer, the program should take steps to immediately transfer the program participant to a safe unit if a unit is available. Requests for internal emergency transfers should receive at least the same priority as the program provides to other types of transfer requests.

If a safe unit is not immediately available, program staff will inform the program participant that a unit is not immediately available and explain the options to:

1. Wait for a safe unit to become available for an internal transfer,

2. Request an external emergency transfer, and/or

3. Pursue both an internal and external transfer at the same time in order to transfer to the next available safe unit in the CoC.

**D. External Transfer**

If a program participant requests an external emergency transfer, this person has priority over all other applicants for CoC-funded housing assistance, provided the household meets all eligibility criteria required by HUD and the program. After the agency communicates the program participant’s emergency transfer request to the Coordinated Entry System Manager, they will facilitate referral of the participant to the next available appropriate unit through the Coordinated Entry System. The household retains their original homeless status for the purposes of the transfer.

**E. Documentation and Record Keeping**

To request an emergency transfer, the program participant should submit a written request to program staff, certifying that they meet the emergency transfer qualification requirements. The program may – but is not required to – request additional documentation of the occurrence for which the program participant is requesting an emergency transfer. No other documentation is required.

Programs must retain records of all emergency transfer requests and their outcomes for a period of 5 years following the grant year of the program in which the household was a participant and report them to HUD annually.