

Arizona
Continuum of Care Program &
Emergency Solutions Grant Program

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

Adopted by the Maricopa Regional Continuum of Care Board January 30, 2023

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These policies were previously integrated into other policies and procedures; however, upon adoption by the Board, they were established as a standalone document.

Overview

Arizona's Continuums of Care (CoCs), Emergency Solutions Grant (ESG) recipients, and housing providers under the CoC and ESG Programs are concerned about the safety of their tenants, including those who are victims of domestic violence, dating violence, sexual assault, or stalking. The Violence Against Women Act (VAWA) provides protection for victims of these acts (herein called "VAWA violence/abuse").¹

Any tenant living in CoC- or ESG-funded housing who is a victim of domestic violence, dating violence, sexual assault, or stalking and whose current housing has become unsafe due to VAWA violence has the right to request an emergency transfer from their current housing to new, safe housing of their choice. This Emergency Transfer Plan (ETP) defines how Arizona's CoC and ESG recipients and subrecipients have implemented this housing protection.

This ETP identifies:

- Tenants who are eligible for an emergency transfer
- The documentation needed to request an emergency transfer
- Confidentiality protections
- The operational steps and timelines associated with an emergency transfer,
- Guidance regarding safety and security

This ETP is based on Federal cross-cutting regulations at [24 CFR Part 5, Subpart L](#), program-specific regulations for the CoC Program at [24 CFR 578.99\(j\)\(8\)](#) and for the ESG Program at [24 CFR 576.409\(d\)](#), and the model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD).

This ETP has been adopted throughout the state of Arizona and applies to all CoCs, ESG recipients, and CoC- and ESG-funded housing projects as defined in Applicability, below.

Definitions

Confidential Information: Includes any details about the survivor's experience, the nature of the violence, or the individual's location, family composition, or contact information.

Covered housing provider: the individual or entity under a covered housing program that has responsibility for the administration and/or oversight of VAWA protections. For the purposes of this ETP, this most commonly refers to the CoC or ESG recipient or subrecipient who is directly responsible for the tenant's housing assistance. It can also apply to landlords/property owners, particularly in relation to participant PII. For more information, refer to [24 CFR 5.2003 "Covered housing provider"](#), to [24 CFR 578.99\(j\)\(2\)](#) for the CoC Program, and to [24 CFR 576.409\(b\)](#) for the ESG Program.

Emergency transfer candidate: a tenant living in CoC- or ESG-funded housing who has requested and been approved to receive an emergency transfer but who has not yet completed that transfer by

¹ Definitions of domestic violence, dating violence, sexual assault, and stalking can be found at [24 CFR 5.2003](#)

moving into new, safe housing.

External transfer: an emergency relocation of a tenant to another unit where the tenant would be categorized as a new tenant, meaning the tenant must undergo a housing application process to reside in the new unit. External transfers include but are not limited to:

- A tenant in a Rapid Re-Housing (RRH) project moving from their current unit to a new unit in a new housing complex while remaining in that RRH project
- A tenant in a RRH project moving from their current unit to a new unit in a new, project-based unit in a Permanent Supportive Housing (PSH) project, which requires a project-to-project transfer
- A tenant in a PSH project moving from their current congregate living housing to a new, tenant-based unit in another PSH project, which requires a project-to-project transfer
- A tenant living in a RRH project moving from their current unit in Arizona to a new unit in another state while remaining in that RRH project
- A tenant living in a PSH project in another state requesting a transfer to a new PSH project in Arizona

Informed, Written, Time-Limited Consent: Written authorization that specifies what information may be shared, with whom, for what purpose, and for what period of time.

Internal transfer: an emergency relocation of a tenant to another unit where the tenant would not be categorized as a new tenant, meaning the tenant does not need to undergo a housing application process to reside in the new unit. Internal transfers include but are not limited to:

- A tenant in a RRH project moving from their current unit to a new unit within the same housing complex which does not require a new application while remaining in that RRH project
- A tenant in a PSH project moving from their current project-based unit to a new project-based unit within the same PSH project
- A tenant in a single-site PSH project moving from their current unit at that site to a new unit at that site while remaining in that PSH project

Personally Identifying Information (PII): Information that can be used to identify an individual, such as name, address, contact information, social security number, date of birth, or other identifying data.

Safe unit: a unit that the victim of VAWA violence/abuse believes is safe.

Applicability

This ETP has been adopted by the following CoCs and ESG recipients:

Program	Jurisdiction	Contact Organization	Contact Information
Continuum of Care	Maricopa County	Maricopa Association of Governments Community Initiatives Division	hsinfo@azmag.gov

Program	Jurisdiction	Contact Organization	Contact Information
Continuum of Care	Pima County	Tucson Pima Collaboration to end Homelessness	tpch@tucsonaz.gov
Continuum of Care	Arizona Balance of State Continuum of Care	Arizona Department of Housing	david.bridge@azhousing.gov
Emergency Solutions Grant	State of Arizona	Arizona Department of Economic Security	izimmerman@azdes.gov
Emergency Solutions Grant	Glendale	Glendale Community Services Department Human Services Grants Division	tdileo@glendaleaz.com mhess@glendaleaz.com
Emergency Solutions Grant	Mesa	Mesa City Housing and Community Development	michele.payakovich@mesaaz.gov justin.boyd@mesaaz.gov aeaton@mesaaz.gov
Emergency Solutions Grant	Phoenix	City of Phoenix Neighborhood Services Department	rachel.milne@phoenix.gov margaret.adams@phoenix.gov
Emergency Solutions Grant	Tucson	City of Tucson Housing and Community Development Department	noemi.santana@tucsonaz.gov Andrew.parades@tucsonaz.gov Cat.polston@tucsonaz.gov
Emergency Solutions Grant	Maricopa County	Maricopa County Human Services Department	chela.schuster@maricopa.gov tamara.bridwell@maricopa.gov
Emergency Solutions Grant	Pima County	Pima County Homeless Services Division	judith.herrera@pima.gov jenifer.darland@pima.gov daniel.sullivan@pima.gov
Emergency Solutions Grant	Pinal County	Pinal County Government	heather.patel@pinal.gov

All CoC- and ESG-funded covered housing providers within these jurisdictions are responsible for understanding and implementing the requirements of this ETP. This includes:

- Any CoC Program recipient or subrecipient that administers housing via the Rental Assistance, Leasing, and/or Operating Costs Budget Line Items (BLIs); and

- Any ESG recipient or subrecipient that administers housing via short-term or medium-term rental assistance

Eligibility

Tenant Eligibility

Tenants living in CoC- and ESG-funded housing can request an emergency transfer if they or a member of their household is a victim of VAWA violence/abuse.

Tenants are eligible for an emergency transfer if they meet the following criteria:

1. The tenant or their household member is a victim of VAWA violence/abuse (which can be certified at the time of the ETP request); AND
2. The tenant specifically requests the emergency transfer; AND ONE OR BOTH OF THE FOLLOWING:
 - a. The tenant believes there is a threat of imminent harm from further violence or trauma if they or a household member remains in their current housing; and/or
 - b. The tenant or their household member is a victim of sexual assault, and the sexual assault occurred on the premises of their current unit within the 365-calendar-day period preceding the date on which the tenant requests an emergency transfer.

Providers cannot impose any other eligibility criteria. The following is a non-exhaustive list of criteria that cannot be used to limit access to an emergency transfer:

- *Sex, Gender, Sexual Orientation:* ETP protections are not restricted or limited by actual or perceived sexual orientation, gender identity, or sex.
- *Marital status:* ETP protections are not restricted or limited by marital status or lack thereof
- *Other Protected Characteristics:* ETP protections are not restricted or limited on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age.
- *Service Provider, Project Type:* ETP protections are not limited to tenants being served by victim services providers (VSPs) or to tenants in projects dedicated to victims of domestic violence, dating violence, sexual assault, or stalking; they are equally available to tenants being served by non-VSPs and to tenants in projects with different target populations.
- *Documentation:* ETP protections are not limited to tenants who documented to their housing provider that they are a victim of domestic violence, dating violence, sexual assault, or stalking prior to requesting an emergency transfer; they are equally available to tenants who submit documentation with their emergency transfer request, tenants who submit documentation as part of the emergency transfer process, and tenants who are not required by their housing provider to submit documentation.
- *Good standing:* ETP protections are not limited to tenants in good standing and cannot be restricted by factors such as back due rent, non-participation in supportive services, substance use or a history of substance use, perceived unreliability, or criminal activity or a history of criminal activity except as specified by State or local law.

Emergency shelter residents are not eligible for emergency transfer as emergency shelter is a crisis intervention not a permanent housing intervention.

Destination Eligibility

This ETP does not limit whether a new, safe unit is eligible to receive an emergency transfer candidate:

- **Emergency transfer candidates currently living in Arizona** can request an emergency transfer to a unit in Arizona, outside Arizona, or both concurrently.
- **Emergency transfer candidates currently living outside Arizona in projects operated by non-Arizona providers** can request an emergency transfer to a unit in Arizona.
- **Emergency transfer candidates currently living outside Arizona in projects operated by Arizona providers** can request an emergency transfer to a unit in Arizona, outside Arizona, or both concurrently. *This situation should only apply to participants who have used voucher portability or a previous emergency transfer to enroll in an Arizona project, then move out of state.*

When an emergency transfer candidate requests to move into/out of Arizona, the covered housing provider and the applicable CoC or ESG recipient within Arizona will make all reasonable efforts to facilitate the interstate transfer. If the candidate is transferring from a non-Arizona project, the CoC/ESG recipient will expect the candidate's project of origin to make all reasonable efforts to facilitate the transfer and to bear all associated costs.

Unit eligibility can depend on the destination unit/project; for example, an emergency transfer candidate aged 24 may be ineligible to transfer into a unit whose occupancy is restricted to people aged 65+. Unit eligibility can also depend on State or local law; for example, an emergency transfer candidate who is listed on a sex offender registry may be ineligible to transfer into a unit with certain geographic characteristics as specified by law.

The CoC and ESG Program interim rules detail what will happen to the non-transferring household member(s) if a household receiving tenant-based rental assistance separates to affect an emergency transfer:

- **CoC Program:** When a safe unit is not immediately available for an internal emergency transfer, the individual or family retains their original homeless or chronically homeless status for the purposes of the transfer; additionally, they shall have priority as defined by the Prioritization section.
- **ESG Program:** When a safe unit is not immediately available for an internal emergency transfer, the program participant shall have priority over all other applicants for tenant-based rental assistance, utility assistance, and units for which project-based rental assistance is provided.

Prioritization

Emergency transfer candidates shall be prioritized in relation to other applicants for assistance as defined in this section. The impacts of this section should be integrated into the coordinated entry policies and procedures of each CoC that has adopted this policy.

Note: tenants retain their original homelessness status, including their chronic homelessness status, both during and after completing an emergency transfer.

Internal Transfers

Internal transfers refer to unit transfers occurring within a project (site-based and project-based). Emergency transfer candidates shall be prioritized over all other applicants for housing within the project.

Emergency transfer candidates shall be prioritized in relation to each other in accordance with the project's policies and procedures or, if the project has no policies and procedures for internal transfer prioritization, they shall be prioritized in order that their emergency transfer requests are approved.

External Transfers

Emergency transfer candidates shall be prioritized over all other applicants for housing referrals via coordinated entry. Emergency transfer candidates currently living inside Arizona shall receive the same priority as emergency transfer candidates currently living outside Arizona.

External transfer candidates:

- Shall be prioritized over all other coordinated entry applicants on all housing waitlists and for all housing for which they qualify; AND
- Shall be prioritized in relation to each other in accordance with the CoC's coordinated entry policies and procedures or, if the CoC has no policies and procedures for external transfer prioritization, they shall be prioritized in the order their emergency transfer requests were approved; AND
- Shall not be requested or required to complete a quantitative assessment such as the VI-SPDAT

Emergency Transfer Implementation

Emergency transfers shall be implemented as follows, including timing and operational flow. Neither housing providers nor CoC/ESG recipients may specify how long it will take for an emergency transfer to complete. While neither CoCs nor ESG recipients can guarantee the completion of an emergency transfer in a specific timeframe, housing providers must act as quickly as possible to assist each emergency transfer candidate.

The emergency transfer process is not time limited and shall continue until either:

- The tenant is placed in new, safe housing; OR
- The tenant withdraws their emergency transfer request; OR
- The tenant exits the project

There is no limit to the number of times a tenant can request or receive an emergency transfer. Tenants shall not be penalized for requesting multiple emergency transfers or for withdrawing and subsequently resubmitting an emergency transfer request.

If the housing provider identifies an available unit (via internal or external transfer) and the emergency transfer candidate believes that unit is not safe, the tenant can decline that unit without penalty, and the housing provider shall continue to attempt to work with the candidate to identify another available unit.

Initial Request

To request an emergency transfer, the tenant shall notify any of the following:

- Any person employed by their housing provider who is providing that tenant with case management or supportive services; OR
- The housing provider's management office; OR
- Another entity as defined in the housing provider's policies and procedures

The transfer request may be submitted verbally or in writing (tenant's choice). If the tenant chooses to submit a written request, the tenant may use but is not required to use [Form HUD-5383](#). The covered housing provider shall not give different priority to written and verbal requests. The covered housing provider shall not limit access to emergency transfers based on the applicant's choice of words or choice of language if the request otherwise establishes that the tenant meets the eligibility requirements under [Tenant Eligibility](#).

Qualification and Eligibility

No more than two (2) business days after receiving the emergency transfer request, the housing provider shall:

- Determine whether the tenant qualifies for an emergency transfer in accordance with the criteria in [Tenant Eligibility](#); AND
- Notify the tenant whether they qualify or do not qualify; this ETP does not define the notification process or format but encourages the housing provider to prioritize notifying the tenant quickly without compromising the tenant's safety

To be approved, the request must establish that the tenant meets the eligibility requirements listed under [Tenant Eligibility](#). If the housing provider does not already have documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking, the housing provider may request it in accordance with [24 CFR 5.2007](#). Unless the housing provider receives documentation that contains conflicting information as described in [24 CFR 5.2007\(b\)\(2\)](#), the housing provider cannot require third-party documentation to determine the tenant's eligibility for an emergency transfer. The housing provider cannot otherwise require third-party documentation to determine the tenant's eligibility for an emergency transfer.

If the tenant qualifies and after the tenant has been notified, the housing provider shall move onto the [Internal Transfer Process](#).

Internal Transfer Process

No more than five (5) business days after receiving the emergency transfer request, the housing provider shall:

- Determine whether one or more units are available via internal transfer; AND
- Offer those unit(s) to the emergency transfer candidate

The emergency transfer candidate shall be prioritized as specified in [Internal Transfers](#). If the emergency transfer candidate accepts an internal transfer to an available unit, the housing provider shall complete

that transfer using the process in [Transfer Completion Process](#).

If an internal transfer is not immediately available OR the emergency transfer candidate refuses all available internal transfer units, the housing provider shall assist the candidate in identifying other housing providers who may have safe and available units to which the candidate could move via the [External Transfer Process](#). At the candidate's request, the housing provider will also assist the candidate in contacting local VSPs as listed in [Safety and Security](#).

External Transfer Process

No more than five (5) business days after determining that an immediate internal transfer is not possible, the housing provider shall:

- Register the emergency transfer candidate for all applicable CoC and ESG housing waitlists, including via the local coordinated entry system, wherein the emergency transfer candidate will be prioritized as specified in [External Transfers](#)

During the External Transfer Process, the housing provider shall:

- Continue to attempt to identify internal transfer units until and unless the emergency transfer candidate refuses internal transfers as a whole; AND
- Assist the emergency transfer candidate in registering for other affordable housing opportunities or programs such as Public Housing Authority (PHA) waitlists, the Projects for Assistance in the Transition from Homelessness (PATH) Program, the Supportive Services for Veteran Families (SSVF) Program, Runaway and Homeless Youth Transitional Living Program (RHY-TLP) housing, etc.

Housing providers shall support emergency transfer candidates in concurrently pursuing internal transfers, external transfers, and other housing opportunities or programs without penalty and at the emergency transfer candidate's discretion. If the emergency transfer candidate accepts an external transfer to an available unit via coordinated entry, the housing provider shall complete that transfer using the process in [Transfer Completion Process](#).

Transfer Completion Process

No more than five (5) business days after the emergency transfer candidate accepts an internal transfer or an external transfer to a CoC- or ESG-funded housing unit, the housing provider shall:

- Complete the transfer, unless the transfer is delayed by factors outside the housing provider's control such as the tenant's unavailability or unit turnover activities conducted by the housing owner

If the transfer completion process takes more than five (5) business days, the housing provider shall assist the emergency transfer candidate in continuing the current transfer, attempting to identify another unit, or both, at the candidate's discretion.

Confidentiality

All HMIS and CE confidentiality policies for each CoC apply to this ETP policy. While the ETP process requires CE coordination, coordination between housing providers and other CoC partners, information must be kept confidential.

If a tenant inquires about or requests any VAWA protections or represents that they or a household member are a victim of VAWA violence/abuse and are entitled to VAWA protections, the housing provider must keep any information they provide concerning the VAWA violence/abuse, their request for an emergency transfer, and their or their household member's status as a victim strictly confidential. All information provided by or on behalf of the tenant to support an emergency transfer request including information collected on [Form HUD-5382](#) (Certification Form) and [Form HUD-5383](#) (Emergency Transfer Request Form), referred to collectively as "Confidential Information"), can only be accessed by the housing provider's employees or contractors if explicitly authorized by the housing provider for reasons that specifically call for those individuals to have access to that information under applicable Federal, State, or local law.

Safety and Security

When a housing provider receives any inquiry or request regarding an emergency transfer, the housing provider will encourage the enquirer to take all reasonable precautions to be safe, including seeking guidance and assistance from a victim services provider (VSP). Note, however, that tenants are not required to request or receive guidance or assistance from a VSP.

In the interest of putting safety first, the Maricopa Regional CoC has adopted an Emergency Response Protocol that urges service providers to begin safety planning as the first step before initiating or requesting an Emergency Transfer. Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

For additional information on VAWA and to find localized assistance, tenants may visit <https://www.hud.gov/vawa>.

Tenants who are or have been victims of domestic violence should be encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233 or a local domestic violence shelter for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants seeking resources in Arizona can call or text (602) 279-2980 or (800) 782-6400, or access online resources at <https://arizonasurvivors.org/>.

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.nsvrc.org/organizations/stalking-resource-center/>.

Paying for Emergency Transfer Costs

Tenants remain responsible for rent and other costs as specified by their lease and local landlord/tenant law. This includes back due rent and costs associated with breaking the lease. However, CoC Program and ESG recipients and subrecipients are strongly encouraged to pay for these costs using the options listed below.

ESG recipients and subrecipients can use grant funds to pay the costs of effecting an emergency transfer as follows:

- If a program participant receiving short- or medium-term rental assistance under section 576.106 meets the conditions for an emergency transfer, ESG funds may be used to pay amounts owed for breaking a lease to affect an emergency transfer. These costs are not subject to the 24-month limit on rental assistance under section 576.106. ([24 CFR 576.105\(a\)\(7\)](#))

CoC Program recipients and subrecipients can use grant funds to pay the costs of effecting an emergency transfer as follows:

- Tenant-based rental assistance projects can use Rental Assistance BLI funds to pay amounts owed for breaking a lease to effect an emergency transfer. ([24 CFR 578.51\(m\)](#))
- New and renewal projects funded by the CoC Program have access to the VAWA BLI, which can pay costs associated with assessing, coordinating, approving, denying, and implementing emergency transfer requests. For more information about eligible costs and sample activities under the VAWA BLI, refer to [Implementing VAWA 2022 Eligible Costs Under the CoC Program](#) on the HUD Exchange

CoC Program and ESG recipients and subrecipients are encouraged to identify alternative resources to support emergency transfer costs that cannot be paid for using grant funds. Note, however, that ineligible costs under a given CoC/ESG grant that are paid for using alternative resources cannot be recognized as a match for that grant.

Marketing

This section outlines required outreach and communication strategies to ensure that all eligible individuals, housing providers, and community partners are aware of the Emergency Transfer Plan (ETP). These strategies are aligned with CoC and ESG Program requirements regarding affirmative marketing, nondiscrimination, and trauma-informed service delivery.

Marketing to Survivors

Housing providers shall inform tenants and prospective tenants of their rights under the ETP through a combination of written materials and direct communication.

Written Materials

- Tenants must receive written information about the ETP at program intake, annually, and at program exit.
- ETP materials must be displayed in common areas and staff offices of CoC- and ESG-funded project-based housing programs.
- Providers are encouraged to include a brief overview of the ETP in program orientation materials or welcome packets for new residents.

Direct Communication

- For tenants who are/are suspected to be survivors of domestic violence, dating violence, sexual assault, or stalking: staff should offer a more detailed, one-on-one explanation of ETP protections and procedures.
- If staff become aware of incidents or emergency service calls that may indicate safety concerns, they are encouraged to review ETP options with affected tenants.

Marketing to Housing Provider Staff

To ensure effective implementation of the ETP, housing providers must:

- Display ETP informational materials in staff-only areas
- Incorporate ETP education into new staff onboarding
- Offer annual refresher training for all relevant staff

Marketing to Housing Providers and Community Partners

To strengthen system-wide awareness and implementation, CoCs and ESG recipients:

- Must post the ETP on their websites.
- Should share ETP materials to provider listservs.
- Should share ETP information at community trainings, roundtables, and relevant community events.
- Must offer live and on-demand training to CoC- and ESG-funded project staff, including case managers, intake workers, and administrative staff; *nature, frequency, format, etc. are defined by the CoC/ESG recipient.*
- Should ensure Coordinated Entry housing match staff are informed and provide brief overviews of the ETP to tenants at the point of referral.

Marketing Material Guidance

All ETP outreach materials must follow the following guidelines:

- Materials intended for tenants should be discreet to avoid escalating safety risks.
- Staff must uphold tenant confidentiality by ensuring venue appropriateness and privacy for conversations.
- All communication should be inclusive, trauma-informed, and accessible to the greatest extent possible.
- Materials must be compliant with federal nondiscrimination and accessibility standards.
- Written materials should be made available in multiple languages and in formats that accommodate individuals with disabilities.

Documenting and Reporting Outcomes

Housing providers must document all requests for emergency transfers, including the outcome of the requests, and report this information. All records related to emergency transfer requests must be retained for five (5) years in accordance with [24 CFR 5.2005\(e\)](#).

Record Keeping Requirements

All covered housing providers must maintain comprehensive records for each emergency transfer request, including:

- Date of initial request
- Eligibility determination and timeline
- Outcome (transfer completed, request withdrawn, or participant exited program)
- Timeline documentation for each phase of the process

Records must be maintained in a manner that protects tenant confidentiality, as outlined in the [Confidentiality](#) section of this ETP.

Immediate Reporting to Oversight Groups

All emergency transfer requests must be reported to the designated oversight group within five (5) business days of the initial request. The oversight group will conduct regular reviews to identify system improvements and ensure compliance.

Emergency transfer requests should be reported to the following contacts:

- **Maricopa Regional CoC:** Coordinated Entry Leads
 - **Single Adults:** Keys to Change Single Adults Coordinated Entry (SACE), SACE@keystochangeaz.org
 - **Families:** UMOM Family Housing Hub (FHH), Agama@UMOM.org
- **Tucson-Pima CoC:** Coordinated Entry Lead Agencies, tpch@tucsonaz.gov
- **Arizona Balance of State CoC:** Arizona Department of Housing, david.bridge@azhousing.gov

The reports should include the following and must not include de-identified data:

- Request date and general outcome status
- Timeline milestones (decision, communication, unit identification)
- Transfer type (internal vs. external)

Internal Transfers

For transfers within the same housing program or project:

- The housing provider (where the ETP request originated) maintains all records.
- The housing provider reports de-identified data to the appropriate Coordinated Entry Lead or designated oversight group within five (5) business days.

External Transfers

For transfers between different programs, projects, or regions:

- Coordinated Entry Leads track and maintain records for external transfers, including timelines and outcomes.
- De-identified data is reported to the designated oversight group.

Annual HUD Reporting

Housing providers must prepare to compile and submit annual reports to HUD that include:

- Total number of emergency transfer requests received
- Number of requests approved vs. denied
- Average time from request to resolution
- Types of transfers completed (internal vs. external)
- Any systemic barriers or challenges identified

All reporting must comply with HUD's data collection requirements and any future standardized reporting forms as they become available.

Feedback and Continuous Improvement Plan

Arizona's CoCs will conduct an annual review of the ETP to evaluate the policy, gather feedback, and identify opportunities for improvement. The goal is to ensure the ETP remains effective, survivor-centered, and aligned with current best practices.

Review Oversight

The annual review will be conducted by a designated reviewing entity, which may include Collaborative Applicant staff, Coordinated Entry oversight groups, or other appropriate entities. Reviews may be conducted at either the statewide or CoC level, as determined necessary.

Review Areas and Considerations

The review should assess:

1. The experience of ETP participants,
2. The experience of ETP program providers, and
3. A programmatic and operational review of the policy.

The following topics are recommended for consideration, informed by documented ETP requests, participant feedback, and input from invested parties.

Area	Considerations
Applicability	All necessary agencies have adopted the ETP policy.

Area	Considerations
Eligibility	Tenants are not limited in use of the policy by criteria that cannot lawfully be used to limit access. Transfer candidates have adequate choice in identifying a safe destination. Transfer candidates with disabilities are reasonably accommodated in their requests.
Emergency Transfer Request Submission and Documentation	Documentation requirements remain low burden. Forms and documentation are clear and accessible in all necessary ways.
Prioritization	External transfer requests are prioritized appropriately. CE staff are trained in prioritization processes. Transfer candidates are neither requested nor required to complete CE assessments.
Emergency Transfer Implementation	Transfer candidates are not restricted or penalized for submitting multiple requests or withdrawing a request. Candidates may decline offered units until an appropriate unit is accepted, and no time limits are imposed on transfer requests. Housing providers notify candidates within 5 business days if an internal transfer is not possible. Candidates are registered with all applicable CoC and ESG housing waitlists. Transfers are completed within 5 business days of approval.
Confidentiality	Housing providers keep information about requests strictly confidential. Confidential information is not entered into shared databases such as HMIS or shared with other entities unless permitted by the tenant or required by law. Tenants are informed of their rights to confidentiality.
Safety and Security	Tenants are encouraged to engage VSPs for assistance. Providers share resources with tenants upon initiation of the transfer request. Safety planning begins immediately after a transfer request is initiated.

Area	Considerations
Paying for Emergency Transfer Costs	Providers understand how to cover emergency transfer costs. Gaps in funding are identified, such as needs for bridge funding, flexible funds for uncovered costs, or administrative funds.
Marketing	Tenants are informed of their right to an emergency transfer through written communication, posted materials, and verbal communication during program orientation or communication with provider staff. Marketing materials are clear and accessible in all necessary ways. Housing provider staff are trained in the ETP process and have posted relevant information. Coordinated Entry staff and system partners are aware of the ETP and related training opportunities. Training is available to all applicable parties.

Feedback Mechanisms

The review may use a combination of the following suggested methods, as appropriate for each area:

- **Policy Review:** Evaluate the ETP for clarity, compliance, and survivor-centeredness.
- **Invested Party Feedback:** Gather input from providers, contracted agencies, provider staff, partner agencies, and adopting agencies through review of written communication collected during policy implementation, open forum sessions, and feedback forms.
- **Participant Feedback:** Gather input from survivors and participants through review of actual uses of the policy, anonymous surveys, and confidential and secure methods of feedback collection.

Implementation

Annual review findings should be made available and implemented through the following steps:

- Findings should be made available to the community through attachment to the ETP policy and/or made available on CoCs' webpages.
- The reviewing entity will present results to the appropriate CoC Boards. Recommended action steps will be identified, assigned, and tracked for follow-up.
- Policy revisions, training updates, and procedural changes will be implemented as needed.