



HOUSING AND HOMELESS SERVICES DEPARTMENT
808 W. SPOKANE FALLS BLVD.
SPOKANE, WASHINGTON 99201

Housing Assistance Project Transfer Policy

Overview

The purpose of this policy is to establish uniform requirements for the transfer of households between housing assistance projects funded or administered by the City of Spokane Housing and Homeless Services Department (HHS). This policy ensures transfers are participant centered, compliant with applicable program requirements, and subject to some level of oversight.

HHS recognizes that transfers between projects may occasionally be necessary to maintain housing stability, address changing participant needs, or ensure continued eligibility for assistance. However, transfers can't be utilized for administrative convenience, budget management, expenditure maximization, or other purposes that do not directly benefit the household or advance approved system objectives.

Scope

This policy applies to all housing assistance projects funded, administered, or monitored by HHS, including but not limited to the following funded projects:

- Continuum of Care (CoC);
- Consolidated Homeless Grant (CHG);
- Emergency Solutions Grant (ESG);
- Local housing assistance;
- Housing, homelessness, prevention, rapid-rehousing, and supportive housing projects funded through City administered resources.

This policy applies regardless of whether transfer occurs within the same agency or between different agencies.

Policy Statement

Households are enrolled in housing assistance programs to achieve and maintain housing stability. Households are not assigned permanently to a specific funding source, provider, or project.

Transfers between projects may occur when necessary to support the households' housing stability, maintain regulatory compliance, or implement approved system objectives. All transfers must be approved by HHS prior to implementation.



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No household may be transferred from one housing assistance project to another without prior written approval from HHS.

Definition of Transfer

For purposes of this policy, a transfer occurs whenever a household is exited, transferred, or enrolled into a different housing program while continuing to receive housing assistance services.

Transfers include, but are not limited to:

- Movement between different funding sources;
- Movement between projects operated by the same agency;
- Movement between projects operated by different agencies (only allowable for those who are Fleeing DV);
- Movement from one RRH project to another RRH project;
- Movement from one housing subsidy project to another housing subsidy project;
- Movement between housing assistance projects where the household experiences no break in assistance.

Administrative changes that do not result in enrollment in a different project are not considered transfers and will continue to require providers to submit a Help Ticket to HMIS to switch enrollment projects.

Permissible Transfer Circumstances

The anticipated expiration, exhaustion, non-renewal, reduction, or termination of a funding source, alone, is not sufficient justification for a household transfer.

Providers are responsible for managing grant-funded projects in accordance with contract requirements and funding availability. Requests to transfer linked only to funding constraints, grant expiration, budget shortfalls, or expenditure concerns will not be approved absent a separate and document household need that satisfies the requirements of this policy.

Transfers may be approved when one or more of the following circumstances exist:

1. Housing Stability



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The transfer is necessary to maintain or improve the household's housing stability and continued access to housing assistance.

2. Funding Source Eligibility

The household no longer meets the eligibility requirement of the current project but remains eligible for assistance through another project.

3. System Directed Transfer

HHS, the CoC, or any other authorized governing body that directs the transfer to implement an approved system initiative, project restructure, funding reallocation, corrective action plan, or other approved system objective.

Transfer Request Requirements

Prior to any transfer, the provider must submit a written Transfer Request to HHS. At minimum, the request should include:

- HMIS #
- Current provider and project
- Current funding source
- Proposed provider and project, if applicable
- Reason for transfer
- Documentation supporting the transfer request
- Any impact on housing stability
- Confirmation that the household has been informed of the proposed transfer
- Documentation demonstrating household eligibility for the receiving project

HHS Review and Approval

HHS will review all transfer requests to determine whether the transfer is consistent with applicable federal, state and local requirements. Staff will also ensure that the transfer does not circumvent Coordinated Entry policies, project eligibility requirements, or system priorities.

If approved, HHS will email the provider with an authorization. This authorization correspondence will be retained by the requesting provider, the provider receiving transferred clients (if different than the requesting provider) and HHS.

Emergency Transfer Policy



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This policy in no way encroaches or a replacement or supplement to our current CoC Emergency Transfer Policy.

Unauthorized Transfers

Transfers completed without prior written HHS approval will be treated as unauthorized and may result in:

- Monitoring findings
- Corrective action issuance
- Repayment of ineligible costs
- Disallowance of expenditures
- Contractual remedies authorized under the provider agreement;
- Consideration during future funding