



MEMO

To: Continuum of Care (CoC) Recipients
From: Brandi Ross, Director, Continuum of Care
Subject: Updated VAWA Information
Date: August 11, 2025

As part of our shared commitment to ensuring the safety and rights of all program participants, especially survivors of domestic violence, dating violence, sexual assault, or stalking, the Midlands Area Consortium for the Homeless (MACH) has updated our Emergency Transfer Plan in accordance with HUD's guidance under the Violence Against Women Act (VAWA).

This update includes new expectations around documentation, tracking, and survivor protections. Specifically:

- All clients must receive HUD Form 5380 (Notice of Occupancy Rights under VAWA) at intake and lease renewal.
- If a client requests an emergency transfer, you must provide them with HUD Forms 5382 (VAWA Certification) 5383 (Emergency Transfer Request Form). These are optional for the client to complete, and other documentation can be accepted.
- All providers must submit a bi-annual Emergency Transfer Plan (similar to HUD Form 5384), even if reporting zero activity. This helps us monitor compliance and identify system level barriers. Link to Cognito form →

<https://www.cognitoforms.com/UnitedWayOfTheMidlands1/VAWAEmergencyTransferReporting>

We understand that this introduces additional documentation and tracking responsibilities. MACH is committed to supporting your efforts and will offer training and technical assistance as needed or upon request.

Please begin using the updated forms and following the revised plan immediately. Compliance with these requirements will be reviewed during your next scheduled monitoring.

As always, thank you for all you do to help your community!

Midlands Area Consortium for the Homeless (MACH)
**Emergency Transfer Plan for Victims of Domestic Violence,
Dating Violence, Sexual Assault, or Stalking**

Continuum of Care – SC-502

Contact: Brandi Ross, Director | BRoss@UWay.org

I. Introduction. The Midlands Area Consortium for the Homeless (MACH), as the Continuum of Care (CoC) for SC 502, is committed to supporting the safety and stability of program participants receiving assistance through CoC funded projects. In compliance with the Violence Against Women Act (VAWA), this Emergency Transfer Plan outlines the procedures and policies that allow victims of domestic violence, dating violence, sexual assault, or stalking to request and receive emergency housing transfers.

This plan is based on HUD's model Emergency Transfer Plan (Form HUD-5384) and fulfills the requirements of 24 CFR part 5, subpart L.

All clients must receive HUD Form 5380 (Notice of Occupancy Rights Under VAWA) at intake and at each lease renewal. If an emergency transfer is requested, providers must also offer HUD Forms 5382 (VAWA Certification) and 5383 (Emergency Transfer Request).

II. Eligibility for Emergency Transfer. A participant in a CoC funded project is eligible for an emergency transfer if: the participant is a victim of domestic violence, dating violence, sexual assault, or stalking; **and** the participant reasonably believes that there is a threat of imminent harm from further violence if they remain in their current unit; **or** the participant is a victim of sexual assault, and the sexual assault occurred on the premises within the 90 calendar day period prior to the request for a transfer.

Participants may be eligible for emergency transfer regardless of whether they are in good standing under the terms of their lease or occupancy agreement.

III. Emergency Transfer Request Process. To request an emergency transfer, a participant should submit a written request to their project case manager or housing provider. The written request must include:

- A statement that the participant believes they are at risk of imminent harm if they remain in the unit; **or**
- A statement that the participant is a victim of sexual assault that occurred on the premises within the previous 90 calendar days.
- The participant may, but is not required to, submit supporting documentation, such as a police report, court order, or a statement from a victim services provider.

Providers must notify MACH at the time of an emergency transfer request to ensure the CoC is aware and can assist with coordination and tracking. Notifications should be sent to Brandi Ross at BRoss@UWay.org.

Additionally, providers must complete and submit the Emergency Transfer Plan form (HUD 5384) on a bi-annual basis (January – June; July – December), even if no transfers have occurred, indicating "zero" activity when applicable. If a transfer has occurred, MACH may follow up to gather data on the timing, safety concerns, and services provided to the participant.

IV. Confidentiality. All information related to the emergency transfer request, including the location of any new unit, will be kept strictly confidential unless:

- The participant gives written consent for limited disclosure;
- Disclosure is required by law; or
- Disclosure is necessary for use in an eviction proceeding or to enforce lease obligations.

Information related to the request should not be entered or shared through HMIS unless necessary and only with restricted access. Participants may be transitioned to a comparable database when appropriate to safeguard confidentiality.

V. Emergency Transfer Timing and Availability. MACH and its partner agencies will strive to process emergency transfer requests and locate alternative housing as quickly as possible. However, the availability of safe and appropriate units may impact the timeline.

If a participant reasonably believes a unit is not safe, even if it is available, providers must honor that determination and explore other options.

If a safe unit is not immediately available, MACH will:

- Coordinate with other CoC partners to identify safe alternatives;
- Provide referrals to other housing programs (within or outside the CoC);
- Support participants with housing search, relocation costs, and safety planning as needed.

VI. Safety and Supportive Services. Pending transfer, participants are encouraged to engage in supportive services related to domestic violence, dating violence, sexual assault, or stalking. Services can be accessed through project staff or by contacting MACH directly.

VII. Prioritization. If multiple survivors qualify for transfers and units are limited, prioritization will be based on the following order: imminent risk of harm, recency of violence, availability of comparable housing alternatives, survivor input on safety needs.

VIII. Recordkeeping and Monitoring. Each agency must retain a copy of this emergency transfer plan and any transfer requests submitted. MACH will monitor adherence to this plan during program reviews and will provide technical assistance as needed to ensure compliance with VAWA.

IX. Collaboration with Victim Service Providers. MACH encourages coordination with local victim service providers to assist survivors with transfer planning, ensure trauma informed and culturally appropriate services, and to provide supportive services during and after the transfer.

Local Referral Resources:

- Sistercare – Crisis Line: 803-765-9428 (www.sistercare.org)
- Safe Passage –Crisis Line: 803-329-2800 (www.safepassagesc.org)

X. Survivor Rights. Survivors have the right to:

- Confidentiality;
- Request and receive an emergency transfer, where feasible;
- Remain in housing without being penalized for being a survivor of domestic violence, dating violence, sexual assault, or stalking;
- Receive written notification of VAWA rights at move-in, lease renewal, and at termination.

XI. Contact Information. For questions or assistance with an emergency transfer request, please contact:

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