
















Tenant Screening:	Does the Program Require Providers Who House Tenants to Accept Applicants with the Greatest Needs or Vulnerabilities?				
State Programs	Providers Must Accept Tenants Regardless of Sobriety/Completion of Treatment	 Providers Do Not Reject Applicants for Poor Credit/Financial History, Criminal Background	 Providers May Not Impose a “Housing Readiness” Requirement on Applicants for Housing	 Providers Receive Referrals to Housing from Homeless Response System	 Program Offers Funding Incentives to Providers to Accept Referrals from Coordinated Entry/Assessment Systems
Health Homes Program	✓	✓	✗	✓	✗
<p>Comments: The Health Homes Program (HHP) arranges for and coordinates interventions that address the medical, social, behavioral health, functional impairment, cultural and environmental factors affecting health and health care choices available to HHP members. HHP does not provide direct housing to HHP members; however, it does provide Individual Housing Transition Services to support an individual’s ability to prepare for and transition to housing, and Individual Housing and Tenancy Sustaining Services that support the individual in being a successful tenant in their housing arrangement and thus able to sustain tenancy.</p> <p>In order to be eligible for HHP an individual must meet the identified chronic condition criteria and acuity/complexity criteria. Among those criteria, substance use disorders are included as qualifying conditions for eligibility. The HHP program has eligibility exclusion criteria, but the eligibility and exclusion criteria do not address sobriety, completion of treatment, poor credit, financial history, criminal background or housing readiness.</p> <p>Because HHP does not provide direct housing to HHP members, HHP does not direct housing providers to accept tenants regardless of sobriety/completion of treatment, nor does it require them to accept applicants regardless of poor credit/financial history or a criminal background. HHP does not direct housing providers to not impose a “housing readiness requirement” on applicants for housing.</p> <p>Providers, health plan staff, or other, non-provider community entities/care providers (including shelters, street outreach, drop-in centers, and other parts of the crisis response systems frequented by vulnerable people experiencing homelessness) may refer eligible members to the member’s assigned MCP to confirm if the member meets the eligibility criteria to receive HHP services.</p> <p>Additionally, the HHP Program Guide does not include language that discusses offering funding incentives to providers to accept referrals from these systems. While HHP does not provide funding incentives, HHP does allow the prioritization of proactive outreach and engagement for those members who present the greatest opportunity for improvement in care management and reduction in negative health outcomes and the allocation of additional resources for members who require additional assistance to improve the appropriate management of their care.</p>					
<p>Recommendations: DHCS will update the HHP Program Guide to require that HHP housing services provided to HHP members are consistent with the “Housing First” core components, to the extent that the components can be applied to HHP housing case management services. Specifically, the HHP Program Guide will be modified to state that Managed Care Plans (MCPs) and Community Based Care Management Entities (CB-CMEs) may not restrict engagement or services for individuals based on sobriety, completion of treatment, poor credit, financial history, criminal background, or housing readiness, unless they meet one or more of the DHCS defined exclusionary criteria. DHCS will also revise the HHP Program Guide to encourage HHP Providers to receive referrals from the homeless crisis response system entities. HHP providers will also be encouraged to coordinate with coordinated entry and assessment systems, when appropriate and available, that prioritize housing for eligible tenants based on criteria other than “first-come-first-served,” including, but not limited to, vulnerability of early mortality or high utilization of crisis services.</p>					

Housing-Based Services:	Are Services Tailored to Tenant's Needs, Rather Than to Meet Set Programmatic Requirements?			
State Programs	Services Providers are Required to Offer Services Emphasizing Engagement & Problem-Solving, Rather than Meeting Set Therapeutic Goals	 Services Providers Use Evidence-Based Practices for Engagement	 Services Providers Practice Harm Reduction and/or Recognize Drug/Alcohol Use As Part of Tenant's Lives & Recovery	Providers Offer Tenants Education on Avoiding Risky Behaviors and Connect to Evidence-Based Treatment By Choice
Health Homes Program	✓	✓	✗	✓
<p>Comments: HHP services are required to be tailored to the individual member and emphasize engagement and problem-solving, rather than a strict adherence to meeting set goals. HHP provides Comprehensive Care Management and Care Coordination services, which focus on the development and implementation of the HHP member's comprehensive, individualized, person-centered care plan, called a Health Action Plan (HAP). The HAP incorporates the member's needs in the areas of physical health, mental health, Substance Use Disorder, community-based LTSS, palliative care, trauma-informed care needs, social supports, and, as appropriate for individuals experiencing homelessness, housing. HHP also provides health promotion services to encourage and support HHP members to make lifestyle choices based on healthy behavior, with the goal of motivating members to successfully monitor and manage their health, including using evidence-based practices, such as motivational interviewing, to engage and help HHP members participate in and manage their care. While there is no explicit mention of "harm reduction" in the HHP Program Guide. As a part of the Individual Housing Transition Services and Housing and Tenancy Sustaining Services the HHP offers, HHP providers may assist members with education on tenancy-sustaining best practices, work with the member to develop an individualized housing support plan, and coordinate with the rest of the multi-disciplinary care team to connect the member to needed treatment(s).</p>				
<p>Recommendations: DHCS will update the HHP Program Guide to require HHP providers to utilize "Harm Reduction" strategies that recognize drug/alcohol use and addiction a part of HHP members lives, when providing housing-based services to members with drug/alcohol or other substance related disorders, where necessary and appropriate (motivational interviewing and trauma-informed care practices are already incorporated).</p>				

Services Are Voluntary:	Does the Program Prohibit Conditioning Housing Tenancy on Tenant Participation in Services or Program Compliance?	
State Programs	 <p>Housing Providers Must Accept Most Vulnerable Californians Eligible for Program, Regardless of Applicant's Willingness to Participate in Services (though program may require services providers to offer services)</p>	 <p>Program Disallows Housing/Services Providers from Conditioning Tenancy on Participation in Services or Program Compliance</p>
Health Homes Program	<p style="text-align: center;">✓</p>	<p style="text-align: center;">✓</p>
<p>Comments: HHP does not provide direct housing. HHP provides housing transition and tenancy sustaining case management services, which are provided as a voluntary package of whole-person care coordination services.</p>		
<p>Recommendations: The Health Homes Program does not provide direct housing. Because these housing first requirements relate to conditions of tenancy, they are not applicable to the voluntary HHP package of case management services.</p>		

Housing Permanency	Does the Program Require Housing Providers to Offer Housing Without Limit on Length of Stay, with a Lease? <i>If the Housing is Time-Limited, Is the Housing Provider Required to Connect Tenants to Permanent, Decent, Safe Housing Upon Exit?</i>			
State Programs	 <p>Program Requires Housing Providers to Provide Tenants with Leases and Reflects Tenants' Rights & Responsibilities Of Tenancy Under CA Law <i>(including eviction protections)</i></p>	 <p>Program Disallows Housing Providers from Evicting Tenants for Use of Drugs/Alcohol w/o Lease Violations</p>	<p>Program Does Not Fund Time-Limited Housing, Unless Housing/ Services Providers Assist Tenants in Relocating to Decent, Safe Permanent Housing Tenant Can Afford Upon Exit</p>	 <p>If Funding Homeless Youth Program, Any Time-Limited Housing Documents Efforts to Avoid Eviction & Help Tenant Find Permanent, Decent, Safe Housing Upon Exit</p>
Health Homes Program				
<p>Comments: HHP does not provide or fund direct housing to HHP members, including time-limited housing. However, it does provide Individual Housing Transition Services to support an individual's ability to prepare for and transition to housing, and Individual Housing and Tenancy Sustaining Services, that support the individual in being a successful tenant in their housing arrangement and thus able to sustain tenancy. HHP Housing navigators are tasked with forming and fostering relationships with housing agencies and permanent housing providers, including supportive housing providers; partnering with housing agencies and providers to offer the HHP member permanent, independent housing options, including supportive housing; and connecting and assisting the HHP member to get available permanent housing.</p> <p>HHP does not provide direct housing. Because these housing first requirements relate to conditions of tenancy, the requirements are not applicable to the voluntary HHP package of case management services.</p>				
<p>Recommendations: DHCS will update the HHP Program Guide to encourage HHP housing navigators to provide HHP housing-based services consistent with the Housing First core components that prioritize connecting HHP members with permanent housing options, when appropriate and available.</p>				