




<p><b>Housing First Core Component:</b></p>	<p>WIC 8255 (b)(1)                  Tenant screening and selection practices that promote accepting applicants regardless of their sobriety or use of substances, completion of treatment, or participation in services.</p>			
<p><b>What does this look like:</b></p>	<p>Providers Must Accept Tenants Regardless of Sobriety/Completion of Treatment</p>	<p>Providers May Not Impose a "Housing Readiness" Requirement on Applicants for Housing</p> 	<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> 
<p><b>Rental Housing</b>  <b>Does the Housing First Core Component apply?</b> Conditional. Yes, except participation in services is required.</p> <p><b>Why?</b>                  Under the Community Services and Supports (CSS) component, Rental Housing includes rental assistance or capitalized operating subsidies; Security deposits, utility deposits, or other move-in cost assistance; Utility payments; Moving cost assistance; and Capital funding to build or rehabilitate housing for homeless, mentally ill persons or mentally ill persons who are at risk of being homeless. (5892.5)</p> <p>Project Based Housing generally includes Master Leasing of property/units, or purchasing/renovating/constructing housing owned by the county (including a local government housing entity). (CCR 3630.05)</p> <p>One of the principals of the Adult System of Care is housing that is immediate, transitional, permanent, or all of these. Housing under Project Based Housing and Rental Housing may include one or all of these. Accepting applicants regardless of sobriety or use of substances ensures the county is not excluding an individual that otherwise would benefit from the needed services.</p> <p>The key is services. The county is required to develop an individual service plan with the prospective tenant, complete an assessment of the client's needs and ensure that the client receives the services that are agreed to in the personal services plan. While an individual does not need to accept every treatment option available to them, such as drug/alcohol rehabilitation, there does need to be some form of engagement to enable ongoing assessments, amending service plans, and determining outcomes. In addition, an individual could digress at any point in a recovery stage. The county is entrusted to provide each adult and senior served with the medically necessary mental health services, medications, and supportive services set forth in the treatment plan.</p> <p>Providing housing is an initial step toward recovery. It is a conduit to other services. Ongoing engagement, medication, physical health screening, etc. is easier to provide and easier for the tenant to access once housed. Housing, with services, will ensure "that all funds are</p>				



expended in the most cost effective manner and services are provided in accordance with recommended best practices.” (Mental Health Services Act (MHSA) Purposes and Intent (e)).

**Project Based Housing**


**Does the Housing First Core Component apply?** Conditional. Yes, but participation in services is required.



**Why?** Same as above.

**Recommendations:** DHCS will develop regulations for Rental Housing and amend regulations for Project Based Housing that require counties to implement tenant screening and selection practices that promote accepting applicants regardless of their sobriety or use of substances and completion of treatment.



<p><b>Housing First Core Component:</b></p>	<p>WIC 8255 (b)(2)                  Applicants are not rejected on the basis of poor credit or financial history, poor or lack of rental history, criminal convictions unrelated to tenancy, or behaviors that indicate a lack of “housing readiness.”</p>				
<p><b>What does this look like:</b></p>	<p> Providers Do Not Reject Applicants for Poor Credit/Financial History, Criminal Background</p>	<p> Providers May Not Impose a “Housing Readiness” Requirement on Applicants for Housing</p>			
<p><b>Rental Housing</b>  <b>Does the Housing First Core Component apply? Yes.</b></p> <p><b>Why?</b>                  DHCS is required to establish service standards for the county’s service planning and delivery process that includes housing for clients that is immediate, transitional, permanent, or all of these. If an individual is eligible for a Full Service Partnership (FSP), the rental housing available to them, based on their need, should be immediate. The FSP eligibility criteria includes those who meet WIC 5600.3, are unserved/underserved and are homeless or at-risk of homelessness (as specified in CCR section 3620.05). The FSP is a service-oriented program that provides an eligible individual with a wide range of services (full spectrum). These services include mental health treatment, needs assessment, crisis intervention, food, clothing, housing, etc. The services provided are meant to mitigate credit issues, “housing readiness” issues, etc., from reoccurring or impacting tenancy through a FSP.</p>					
<p><b>Project Based Housing</b>  <b>Does the Housing First Core Component apply? Yes</b></p> <p><b>Why?</b> With Project Based Housing, the county controls the lease and/or unit. Generally, an individual in a Project Based unit will not be an individual enrolled in a FSP. However, as with an individual on a FSP, past issues regarding criminal convictions or poor credit may prevent an individual from obtaining housing. As the county “controls” the Project Based unit, requiring a county to accept individuals regardless of poor credit history, criminal convictions unrelated to tenancy, or behaviors that indicate a lack of “housing readiness” is a practice the county should be implementing already.</p>					

**Recommendations:** DHCS will develop regulations for Rental Housing and amend regulations for Project Based Housing that require counties ensure applicants are not rejected on the basis of poor credit or financial history, poor or lack of rental history, criminal convictions unrelated to tenancy, or behaviors that indicate a lack of “housing readiness.”




<p><b>Housing First Core Component:</b></p>	<p>WIC 8255 (b)(3) Acceptance of referrals directly from shelters, street outreach, drop-in centers, and other parts of crisis response systems frequented by vulnerable people experiencing homelessness.</p>				
<p><b>What does this look like:</b></p>	 <p>Providers Receive Referrals to Housing from Homeless Response System</p>				
<p><b>Rental Housing</b> <b>Does the Housing First Core Component apply? Yes.</b></p> <p><b>Why?</b> Acceptance of referrals directly from shelters, street outreach, drop-in centers, and other parts of crisis response systems is in-line with the MHSA. The referral may be an initial step toward receiving MHSA services or, for contracted providers, may be part of their contracted duties.</p>					
<p><b>Project Based Housing</b> <b>Does the Housing First Core Component apply? Yes</b></p> <p><b>Why?</b> Same as above</p>					
<p><b>Recommendations:</b> DHCS will develop regulations for Rental Housing and amend regulations for Project Based Housing that require counties to accept referrals directly from shelters, street outreach, drop-in centers, and other parts of crisis response systems frequented by vulnerable people experiencing homelessness.</p>					


<p><b>Housing First Core Component:</b></p>	<p>WIC 8255 (b)(4) Supportive services that emphasize engagement and problem solving over therapeutic goals and service plans that are highly tenant-driven without predetermined goals.</p>			
<p><b>What does this look like:</b></p>	<p>Services Providers are Required to Offer Services Emphasizing Engagement &amp; Problem-Solving, Rather than Meeting Set Therapeutic Goals</p>	 <p>Services Providers Use Evidence-Based Practices for Engagement</p>	 <p>Services Providers Practice Harm Reduction and/or Recognize Drug/Alcohol Use As Part of Tenant's Lives &amp; Recovery</p>	<p>Providers Offer Tenants Education on Avoiding Risky Behaviors and Connect to Evidence-Based Treatment By Choice</p>
<p><b>Rental Housing</b> Does the Housing First Core Component apply? No</p> <p><b>Why?</b> The MHSA requires services be provided to individuals in accordance with an individual service plan that is developed based on the individual's needs. Implementing the plan requires engagement between the tenant and the provider and may require a wide variety of treatment options/practices. If housing is the goal, then the provision of services to maintain housing would seem to be appropriate. Emphasizing one service/treatment over another may be inconsistent with a tenant's needs.</p> <p>WIC 8255(b)(9) will be required (i.e., case managers and service coordinators trained in and employ evidence-based practices for client engagement).</p>				
<p><b>Project Based Housing</b> Does the Housing First Core Component apply? No</p> <p><b>Why?</b> Same as above</p>				


**Recommendations:** This Housing First Core Component is not consistent with MHSA service provisions. DHCS will not add or amend regulations for Rental Housing or Project Based Housing.

<p><b>Housing First Core Component:</b></p>	<p>WIC 8255 (b)(5) Participation in services or program compliance is not a condition of permanent housing tenancy.</p>			
<p><b>What does this look like:</b></p>	 <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>		
<p><b>Rental Housing</b> <b>Does the Housing First Core Component apply? No.</b></p> <p><b>Why?</b> MHSA funds are limited. Funding is provided "...at sufficient levels to ensure that counties can provide each adult and senior served...with the medically necessary mental health services, medications, and supportive services set forth in the applicable treatment plan." (5813.5(a)) Housing is a tool a county uses in its effort to provide appropriate services to an eligible recipient of Community Services and Supports (CSS) services. Housing with no other services is likely to "result in an inability to maintain stable adjustment and independent functioning." While an individual does not need to accept every treatment option available to them, the county and the individual can make these determinations through a service plan. This requires engagement between the county and the individual.</p>				
<p><b>Project Based Housing</b> <b>Does the Housing First Core Component apply? No</b></p> <p><b>Why?</b> Same as above</p>				
<p><b>Recommendations:</b> This Housing First Core Component is not consistent with MHSA service provisions. DHCS will not add or amend regulations for Rental Housing or Project Based Housing.</p>				




<p><b>Housing First Core Component:</b></p>	<p>WIC 8255 (b)(6)                  Tenants have a lease and all the rights and responsibilities of tenancy, as outlined in California’s Civil, Health and Safety, and Government codes.</p>			
<p><b>What does this look like:</b></p>	 <p>Program Requires Housing Providers to Provide Tenants with Leases and Reflects Tenants’ Rights &amp; 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 &amp; Help Tenant Find Permanent, Decent, Safe Housing Upon Exit</p>
<p><b>Rental Housing</b>                  Does the Housing First Core Component apply? Yes</p> <p><b>Why?</b>                  MHSA funds may be used for rental assistance, utility payment, etc. Generally, this assistance is needed to support individuals living in a leased or rented unit.</p>				
<p><b>Project Based Housing</b>                  Does the Housing First Core Component apply? No</p> <p><b>Why?</b>                  Under Project Based Housing the county controls the unit/lease. These units are used at the discretion of the county and may be used as temporary or transitional housing.</p>				
<p><b>Recommendations:</b> DHCS will develop regulations for Rental Housing that require counties to provide tenants with a lease and all the rights and responsibilities of tenancy.</p> <p>DHCS will not amend regulations for Project Based Housing, as the county controls the lease.</p>				

<p><b>Housing First Core Component:</b></p>	<p>WIC 8255 (b)(7) The use of alcohol or drugs in and of itself, without other lease violations, is not a reason for eviction.</p>				
<p><b>What does this look like:</b></p>	 <p>Program Disallows Housing Providers from Evicting Tenants for Use of Drugs/Alcohol w/o Lease Violations</p>				
<p><b>Rental Housing</b> <b>Does the Housing First Core Component apply? Yes</b></p> <p><b>Why?</b> This is consistent with Core Component #1: Tenant screening and selection practices that promote accepting applicants regardless of their sobriety or use of substances. If the use of alcohol or drugs does not preclude an individual from tenancy, the said use, without other lease violations, should not be the cause of eviction.</p>					
<p><b>Project Based Housing</b> <b>Does the Housing First Core Component apply? Yes</b></p> <p><b>Why?</b> Same as above</p>					
<p><b>Recommendations:</b> DHCS will develop regulations for Rental Housing and amend regulations for Project Based Housing to provide that the use of alcohol or drugs in and of itself, without other lease violations, is not a reason for eviction.</p>					

<p><b>Housing First Core Component:</b></p>	<p>WIC 8255 (b)(8)                  In communities with coordinated assessment and entry systems, incentives for funding promote tenant selection plans for supportive housing that prioritize eligible tenants based on criteria other than “first-come-first-serve,” including, but not limited to, the duration or chronicity of homelessness, vulnerability to early mortality, or high utilization of crisis services. Prioritization may include triage tools, developed through local data, to identify high-cost, high-need homeless residents.</p>				
<p><b>What does this look like:</b></p>	 <p>Program Offers Funding Incentives to Providers to Accept Referrals from Coordinated Entry/ Assessment Systems</p>				
<p><b>Rental Housing</b>  <b>Does the Housing First Core Component apply? Yes</b></p> <p><b>Why?</b>                  CSS funds may be used to build or rehabilitate permanent supportive housing (independent of California Housing Finance Agency (CalHFA). For counties with a coordinated assessment and entry system, prioritizing units for eligible tenants based on criteria such as the duration or chronicity of homelessness, vulnerability to early mortality, or high utilization of crisis services, in addition to having a serious mental illness, is consistent with the MHSA.</p>					
<p><b>Project Based Housing</b>  <b>Does the Housing First Core Component apply? No</b></p> <p><b>Why?</b>                  Project Based Housing units are county controlled. These units may be used for temporary or transitional housing. The county decides who is placed in the unit based on the individual needs and availability. DHCS may require counties to prioritize eligible tenants based on criteria other than “first come first serve”. However, DHCS is not able to provide the county financial incentives to implement such a selection process.</p>					

**Recommendations:** DHCS will develop regulations for Rental Housing that require counties, with a coordinated assessment and entry system, to prioritize units for eligible tenants based on criteria such as the duration or chronicity of homelessness, vulnerability to early mortality, or high utilization of crisis services.

DHCS will amend regulations for Project Based Housing that require counties to promote tenant selection plans for supportive housing that prioritize eligible tenants based on criteria other than “first-come-first-serve”.

<p><b>Housing First Core Component:</b></p>	<p>WIC 8255 (b)(9) Case managers and service coordinators who are trained in and actively employ evidence-based practices for client engagement, including, but not limited to, motivational interviewing and client-centered counseling.</p>				
<p><b>What does this look like:</b></p>	<p>Services Providers are Required to Offer Services Emphasizing Engagement &amp; Problem-Solving, Rather than Meeting Set Therapeutic Goals</p>	 <p>Services Providers Use Evidence-Based Practices for Engagement</p>			
<p><b>Rental Housing</b> Does the Housing First Core Component apply? Yes</p> <p><b>Why?</b> This core component is consistent with CSS service provisions. WIC 5806. The State Department of Health Care Services shall establish service standards that ensure that members of the target population are identified, and services provided to assist them to live independently, work, and reach their potential as productive citizens.</p>					
<p><b>Project Based Housing</b> Does the Housing First Core Component apply? Yes</p> <p><b>Why?</b> Same as above</p>					
<p><b>Recommendations:</b> DHCS will develop regulations for Rental Housing and amend regulations for Project Based Housing that require counties to ensure case managers and service coordinators are trained in and actively employ evidence-based practices for client engagement, including, but not limited to, motivational interviewing and client-centered counseling.</p>					

<p><b>Housing First Core Component:</b></p>	<p>WIC 8255 (b)(10)                  Services are informed by a harm-reduction philosophy that recognizes drug and alcohol use and addiction as a part of tenants' lives, where tenants are engaged in nonjudgmental communication regarding drug and alcohol use, and where tenants are offered education regarding how to avoid risky behaviors and engage in safer practices, as well as connected to evidence-based treatment if the tenant so chooses.</p>		
<p><b>What does this look like:</b></p>	<p>Services Providers Practice Harm Reduction and/or Recognize Drug/Alcohol Use As Part of Tenant's Lives &amp; Recovery</p>	<p>Providers Offer Tenants Education on Avoiding Risky Behaviors and Connect to Evidence-Based Treatment By Choice</p>	
<p><b>Rental Housing</b>  <b>Does the Housing First Core Component apply? Yes</b></p> <p><b>Why?</b>                  This core component is consistent with CSS service provisions. While a prospective tenant cannot be denied tenancy based on their sobriety or use of substances, the county/provider would continue to engage "in nonjudgmental communication regarding drug and alcohol use" and "offered education regarding how to avoid risky behaviors and engage in safer practices."</p>			
<p><b>Project Based Housing</b>  <b>Does the Housing First Core Component apply? Yes</b></p> <p><b>Why?</b>                  Same as above</p>			
<p><b>Recommendations:</b> DHCS will develop regulations for Rental Housing and amend regulations for Project Based Housing that require counties to provide services that are informed by a harm-reduction philosophy that recognizes drug and alcohol use and addiction as a part of tenants' lives and where tenants are offered education regarding how to avoid risky behaviors and engage in safer practices, as well as connected to evidence-based treatment if the tenant so chooses.</p>			

<p><b>Housing First Core Component:</b></p>	<p>WIC 8255 (b)(11) The project and specific apartment may include special physical features that accommodate disabilities, reduce harm, and promote health and community and independence among tenants.</p>				
<p><b>What does this look like:</b></p>					
<p><b>Rental Housing</b> <b>Does the Housing First Core Component apply? Yes</b></p> <p><b>Why?</b> This core component is consistent with CSS service provisions.</p> <p>WIC 5813.5(a) Funding shall be provided at sufficient levels to ensure that counties can provide each adult and senior served pursuant to this part with the medically necessary mental health services, medications, and supportive services set forth in the applicable treatment plan.</p> <p>5806(a)(3) Provision for services to meet the needs of target population clients who are physically disabled.</p> <p>5806(a)(4) Provision for services to meet the special needs of older adults.</p>					
<p><b>Project Based Housing</b> <b>Does the Housing First Core Component apply? Yes</b></p> <p><b>Why?</b> Same as above</p>					

**Recommendations:** DHCS will develop regulations for Rental Housing and amend regulations for Project Based Housing that recommends counties include special physical features that accommodate disabilities, reduce harm, and promote health and community and independence among tenants.