

## Comments:

The Bringing Families Home (BFH) eligible population is families involved with the child welfare system who are experiencing or at risk of homelessness. For BFH, homelessness is defined in the Welfare and Institutions Code 16523. The Bringing Families Home Program is a 3-year pilot program, beginning in July 1, 2016 through June 30, 2019, designed specifically to address homelessness among child welfare involved families, to reduce the number of families in the child welfare system experiencing homelessness, increase family reunification, and prevent foster care placements. Through a competitive application process, twelve counties were selected to participate in BFH. Each county program is required to match, on a dollar-for-dollar basis, any State funding provided under the BFH Program.

Funded by CDSS, BFH is operated at the county-level. CDSS continues to work toward ensuring tenant screening compliance at the county-level.

- Per Welfare and Institutions (W&I) Code Section 16523.1 (d)(2), A county that receives state funds under this program shall have a local continuum of care that participates in a homeless services coordinated entry and assessment system, as required by the United States Department of Housing and Urban Development.
- Per the January 10, 2017 BFH All County Welfare Directors Letter (ACWDL), counties should also have established coordinated entry/access systems to housing and link services to homeless families.
- To receive BFH funding, counties are required to demonstrate how they will incorporate the core components of Housing First in their BFH, including prioritization of most vulnerable families, participation in their homeless Continuum of Care (CoC) and other community-based organizations, as well as integration in their coordinated entry/access system.
- Upon receiving BFH funding, County Welfare Directors were required to certify that they would operate a BFH Program consistent with the Housing First core components specified in Welfare and Institutions (W&I) Code section 8255.
- CDSS hosted learning forums for all counties in receipt of BFH funding in June 2017 and February 2018 which included housing first sessions led by national housing experts. Additionally, counties were provided with the Corporation for Supportive Housing (CSH) Housing First checklist and completed the checklist on behalf of their local BFH as part of a CDSS-guided breakout session. CDSS also hosted "office hours" with the Corporation for Supportive Housing (CSH) at the February 2018 learning forum to provide more individualized technical assistance on the core components of housing first.
- CDSS is hosting a Housing First webinar series in partnership with the National Alliance to End Homelessness (NAEH) for all CDSS-funded housing programs CDSS regularly disseminates related trainings and materials published by our state and federal counterparts (HCD, HUD, USICH, etc.) on housing first best practices.

Recommendations:

- If BFH is extended beyond its sunset date of June 30, 2019, CDSS should include the requirement for counties to operate in a manner consistent with SB 1380 and the core components of Housing First enumerated in W&I Code section 8255 in forthcoming regulations.
- If BFH is extended beyond its sunset date of June 30, 2019, CDSS should include guidance around providing funding incentives to providers that accept referrals from Coordinated Entry Systems (CES), as well as continued guidance on addressing barriers such as prior evictions, poor credit, criminal history, etc.
- CDSS will continue providing individual Housing First TA to counties, informed by monthly data and expenditure reporting.
- CDSS will issue a Housing First All County Letter (ACL) by summer 2019.

Housing- Based Services:	Are Services Tailored to T	Fenant's Needs, Rather T	han to Meet Set Programm	natic Requirements?			
State Programs	Counites/Service 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			
Bringing Families Home Program	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$			
<ul> <li>plan. Family reunification and family maintenance plans have specific requirements which may present barriers to persons experiencing housing instability or homelessness. Many of these requirements are federal or statutory, or court-ordered.</li> <li>While BFH statute mandates that an individual/family must have an open child welfare case to be eligible, once they are deemed eligible, BFH participants receive housing supports regardless of their participation in child welfare services. CDSS emphasizes the flexible nature of BFH and encourages counties to provide BFH case management in coordination with the child welfare case management/case plan to ensure that housing is prioritized and supported within the child welfare plan. Additionally,</li> <li>Per WIC Section 16523 (c), an eligible family is defined as "any individual or family that,voluntarily agrees to participate in the program."</li> <li>Per WIC Section 16523.1 (c)(2), housing-related supports available to participating families shall include, but not be limited to: <ul> <li>An assessment of each family's housing needs, including a plan to assist them in meeting those needs</li> <li>The use of evidence-based models, such as motivational interviewing and trauma-informed care, to build relationships with a parent or guardian</li> <li>Housing stabilization services, including ongoing tenant engagement, case management, public systems assistance, legal services, credit repair assistance, life skills training, and conflict mediation with landlords and neighbors.</li> <li>If the family requires supportive housing, long-term services promoting housing stability.</li> </ul> </li> <li>CDSS hosted learning forums for all counties in receipt of BFH funding in June 2017 and February 2018 which included housing first sessions led by national housing experts.</li> <li>Upon receiving BFH funding, County Welfare Directors were required to certify that they would operate a BFH Program consistent with the Housing First core components specified in We</li></ul>							

Are Voluntary:	Does the Program Prohibit Conditioning Housing Tenancy on Tenant Participation in Services or Program Compliance?					
State Programs	Counties/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)	Program Disallows Housing/Services Providers from Conditioning Tenancy on Participation in Services or Program Compliance				
Bringing Families Home Program	$\checkmark$	BFH conditions participation on having an open child welfare case.				
<ul> <li>homelessness, increase family reunification, and prevent foster care placements. In order to be eligible for BFH, a family must have an open family reunification and/or family maintenance plan. Family reunification and family maintenance plans have specific requirements which may present barriers to persons experiencing housing instability or homelessness. Many of these requirements are federal or statutory.</li> <li>Counties are required to participate in their local Coordinated Entry System, and to prioritize their most vulnerable child welfare families. While BFH statute mandates that an individual/family must have an open child welfare case to be eligible, once they are deemed eligible, BFH participants receive housing supports regardless of their participation in child welfare services. CDSS emphasizes the flexible nature of BFH and encourages counties to provide BFH case management in coordination with the child welfare case management/case plan to ensure that housing is prioritized and supported within the child welfare plan.</li> <li>Additionally:         <ul> <li>Per WIC 16523 (c), an eligible family is defined as "any individual or family thatreceives child welfare services at the time eligibility is determined." CDSS acknowledges that that can be viewed as a pre-requisite to receiving housing assistance. However, per WIC Section 16523 (c), an eligible family is also defined as "any individual or family</li> </ul> </li> </ul>						
<ul> <li>Per the Bringing Families Home (BFH) Application Program General Overview and Best Practices, due to the limited resources available for this program and in order for BFH to have the greatest impact, families must be prioritized and those with the greatest need should be served first. This population includes, in order of program priority: <ul> <li>Literally homeless child welfare-involved families with a Family Reunification (FR) case;</li> <li>Literally homeless child welfare-involved families with a Family Maintenance (FM) case OR housing unstable child welfare-involved families with an FR case;</li> <li>Housing unstable child-welfare involved families with an FM case.</li> </ul> </li> <li>Upon receiving BFH funding, County Welfare Directors were required to certify that they would operate a BFH Program consistent with the Housing First core components specified in Welfare and Institutions (W&amp;I) Code section 8255.</li> <li>CDSS hosted learning forums for all counties in receipt of BFH funding in June 2017 and February 2018 which included sessions led by national housing experts on outreach, prioritization and participating in local coordinated entry systems.</li> </ul>						

## Bringing Families Home (BFH) Housing First Checklist | WIC | ACWDL

- If BFH is extended beyond June 30, 2019, CDSS should include the requirement for counties to operate in a manner consistent with SB 1380 and the core components of Housing
  First enumerated in W&I Code section 8255 in forthcoming regulations.
- CDSS will continue providing individual Housing First TA to counties, informed by monthly data and expenditure reporting.
- CDSS will issue a Housing First All County Letter (ACL) by summer 2019.

Housing Permanency	Does the Program Require Housing Providers to Offer Housing Without Limit on Length of Stay, with a Lease? If the Housing is Time-Limited, Is the Housing Provider Required to Connect Tenants to Permanent, Decent, Safe Housing Upon Exit?						
State Programs	Program Requires Housing Providers to Provide Tenants with Leases and Reflects Tenants' Rights & Responsibilities of Tenancy Under CA Law (including eviction protections)	Program Disallows Housing Providers from Evicting Tenants for Use of Drugs/Alcohol w/o Lease Violations	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	If Funding Homeless Youth Program, Any Time-Limited Housing Documents Efforts to Avoid Eviction & Help Tenant Find Permanent, Decent, Safe Housing Upon Exit			
Bringing Families Home Program	$\checkmark$	$\checkmark$	$\checkmark$	n/a			
<ul> <li>Comments: <ul> <li>Funded by CDSS, BFH is operated at the county-level. BFH does not provide direct housing, BFH provides financial assistance and wrap-around supportive services, including, but not limited to: rental assistance, security deposits, utility payments, moving costs, hotel and motel vouchers, landlord recruitment, case management, housing outreach and placement, legal services, and credit repair.</li> <li>CDSS has provided guidance on eviction prevention, risk mitigation and evidence-based housing interventions and progressive engagement to counites through technical assistance efforts and mandates that counites work with their Coordinated Entry System and CoC to ensure coordination of and connection to appropriate services.</li> <li>Additionally, it is strongly recommended that for any cases that exit due to the termination of child welfare services, the case be connected to the Coordinated Entry, CoC, and any other community organizations or partners.</li> <li>BFH is not a youth serving program.</li> </ul> </li> <li>Recommendations: <ul> <li>If BFH is extended beyond June 30, 2019, CDSS HDAP should include the requirement for counties to operate in a manner consistent with SB 1380 and the core components of Housing First enumerated in W&amp;I Code section 8255 in forthcoming regulations.</li> <li>CDSS should provide additional guidance on lease agreements, risk mitigation, landlord incentives and housing navigation in the forthcoming guidance and technical assistance efforts.</li> <li>CDSS will continue providing individual Housing First TA to counties, informed by their monthly data and expenditure reporting.</li> <li>CDSS will issue a Housing First All County Letter (ACL) by summer 2019.</li> <li>CDSS will issue a Housing First All County Letter (ACL) by summer 2019.</li> <li>CDSS plans to host a Tenants Rights webinar in 2019.</li> </ul> </li> </ul>							