



CDSS

WILL LIGHTBOURNE  
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**

744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



EDMUND G. BROWN JR.  
GOVERNOR

May 31, 2018

ALL COUNTY LETTER (ACL) NO. 18-55

TO: ALL COUNTY WELFARE DIRECTORS  
ALL CALWORKS PROGRAM SPECIALISTS  
ALL CALFRESH PROGRAM SPECIALISTS  
ALL COUNTY CHILD WELFARE DIRECTORS  
ALL CHILD WELFARE SERVICES PROGRAM MANAGERS  
ALL COUNTY ADULT PROTECTIVE SERVICES PROGRAM MANAGERS

SUBJECT: IMPLEMENTATION OF ASSEMBLY BILL (AB) 210: HOMELESS  
MULTIDISCIPLINARY PERSONNEL TEAMS

REFERENCE: [AB 210 \(CHAPTER 544, STATUTES OF 2017\)](#); Welfare and Institutions  
Code Sections [827](#), [832](#), [10850](#), and [18999.8](#)

The purpose of this letter is to inform County Welfare Departments (CWDs) of a new California law that authorizes counties to establish a homeless adult and family multidisciplinary personnel team. The goal of these teams is to facilitate the expedited identification, assessment, and linkage of homeless individuals to housing and supportive services within that county. Prior to the passage of this bill, state law did not authorize county departments and homeless service providers to share data on people experiencing homelessness, resulting in a fragmented and duplicative provision of services.

### **Background**

AB 210 (Chapter 544, Statutes of 2017) was signed by the Governor on October 7, 2017, and became effective on January 1, 2018. This bill added section 18999.8 to the Welfare and Institutions Code (WIC), which authorizes counties to create homeless adult and family multidisciplinary personnel teams. Homeless adult and family multidisciplinary personnel teams are any team of two or more persons trained in identifying and treating homeless adults and families, and who are qualified to provide a broad range of services related to homelessness. Members of these teams are allowed to share confidential information for the purpose of coordinating housing and supportive services to ensure continuity of care for the families and individual adults that they

serve. These teams may include, but are not limited to: mental health and substance abuse services personnel; police officers or other law enforcement agents; legal counsel for the adult or family representing them in a criminal matter; medical personnel; social services workers; domestic violence victim service organizations; or housing or homeless services provider agencies and designated personnel. (A more detailed list of possible team members is set forth in WIC section 18999.8.) This bill does not change the current provisions regarding the disclosure, inspection, or sharing of child welfare records pursuant to WIC sections 827, 832, and 10850.

### **County Protocols and Confidentiality**

Counties that choose to create these homeless adult and family multidisciplinary personnel teams must develop protocols for sharing the information permitted by this law. These protocols must describe how and what information may be shared by the team members to ensure that confidential information is not disclosed in violation of state or federal law. The California Department of Social Services (CDSS) recommends that counties draft these protocols in consultation with their county counsel. These protocols must be distributed to each member of the team, posted on the county's homeless services or social services website homepage, and a copy provided to CDSS within 30 days of adoption. The CDSS will maintain a copy of each county's protocols, but is under no obligation to review or approve these documents.

The county protocols shall include, but not be limited to:

1. The items of information or data elements that will be shared;
2. The participating agencies;
3. A description of how the information shared will be used by the homeless adult and family multidisciplinary personnel team only for the purpose of coordinating housing and supportive services;
4. The information retention schedule that participating agencies shall follow;
5. A requirement that no confidential information or writings be disclosed to persons who are not members of the homeless adult and family multidisciplinary personnel team, except to the extent required or permitted under applicable law;
6. A requirement that participating agencies develop uniform written policies and procedures that include security and privacy awareness training for employees who will have access to information pursuant to this protocol;
7. A requirement that all persons who have access to information shared by participating agencies sign a confidentiality statement that includes, at a minimum, general use, security safeguards, acceptable use, and enforcement policies;
8. A requirement that participating agencies employ security controls that meet applicable federal and state standards, including reasonable administrative, technical, and physical safeguards to ensure data confidentiality, integrity, and availability and to prevent unauthorized or inappropriate access, use, or disclosure; and

9. A requirement that participating agencies take reasonable steps to ensure information is complete, accurate, and up to date to the extent necessary for the agency's intended purposes and that the information has not been altered or destroyed in an unauthorized manner.

All information shared must be treated as private and confidential and shall be protected from disclosure under applicable law. Representatives of domestic violence victim service organizations must obtain an individual's informed consent before disclosing confidential information about that individual to other team members. Other members of the homeless multidisciplinary personnel teams may share information between team members without informed consent from the individuals or families; however, counties may choose to include policies regarding formal noticing, informed consent, or opt-out provisions in their county protocols. Existing civil and criminal penalties shall apply to the inappropriate disclosure of information held by team members.

### **Contacts**

If you have any questions related to this letter, please contact the Housing and Homelessness Bureau by phone at (916) 651-5155 or email at [Housing@dss.ca.gov](mailto:Housing@dss.ca.gov). County protocols may be sent to [Housing@dss.ca.gov](mailto:Housing@dss.ca.gov) or mailed to 744 P Street, Mail Stop 8-16-70, Sacramento, CA 95814, Attn: Housing and Homelessness Bureau. The CDSS looks forward to continued partnership with CWDs to assist and support individuals and families experiencing homelessness in California.

Sincerely,

### ***Original Document Signed By***

TODD R. BLAND  
Deputy Director  
Family Engagement and Empowerment Division