

March 21, 2024

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

**ALL COUNTY LETTER NO. 24-21**

The purpose of this letter is to inform County Welfare Departments of the statutory changes made by [Assembly Bill \(AB\) 120 \(Chapter 43, Statutes of 2023\)](#) to the Bringing Families Home (BFH) program.



KIM JOHNSON  
DIRECTOR

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**DEPARTMENT OF SOCIAL SERVICES**  
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GAVIN NEWSOM  
GOVERNOR

March 21, 2024

ALL COUNTY LETTER NO. 24-21

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: **NOTICE OF STATUTORY CHANGES FOR BRINGING FAMILIES HOME (BFH) PROGRAM: IMPLEMENTATION OF ASSEMBLY BILL (AB) 120**

REFERENCE: [ASSEMBLY BILL NO. 120](#); [WELFARE AND INSTITUTIONS CODE \(WIC\) SECTIONS 8255 AND 8256](#); [WIC SECTION 16501](#); [WIC 16523-16523.2](#); [ALL COUNTY WELFARE DIRECTORS LETTER \(ACWDL\) DATED FEBRUARY 11, 2022](#)

The purpose of this All County Letter (ACL) is to provide guidance to all County Welfare Departments (CWDs) regarding the implementation of [Assembly Bill \(AB\) 120](#) (Chapter 43, Statutes of 2023). The AB 120 includes several distinct policy changes to the Bringing Families Home (BFH) program which are outlined and summarized below.

The AB 120 amends the definitions of “child welfare services,” “homeless,” and “permanent housing,” extends the waiver of the funding match requirement; and requires the California Department of Social Services (CDSS) adopt regulations for all provisions of the program by July 1, 2024 as defined in [WIC Section 16523.2\(b\)](#).

## **I. PROGRAM BACKGROUND**

The BFH program is state-funded and administered by eligible counties, tribes, or regional partnerships. BFH provides direct financial assistance and housing-related supportive services to families receiving child welfare services, including tribal child welfare services, where the family is experiencing or at risk of homelessness and housing stability will increase family reunification or prevent foster care placement. Housing assistance includes but is not limited to, housing-related financial assistance related to securing or maintaining housing, rental assistance, security deposit assistance, utility payments, moving cost assistance, and interim housing assistance, housing navigation and housing-related case management.

Current and prospective grantees should review [All County Welfare Directors Letter \(ACWDL\) dated February 11, 2022](#), for a complete overview of BFH program eligibility, services, and requirements.

## **II. ASSEMBLY BILL 120 BRINGING FAMILIES HOME PROGRAM SPECIFIC CHANGES**

For the BFH program, [AB 120](#) amends [WIC Sections 16523 - 16523.2](#). The changes outlined in this document are effective as of July 1, 2023, and are enumerated below.

### *1. Expansion of the definition of “child welfare services”*

Prior to AB 120 enactment, “child welfare services” for the purpose of BFH was defined as having the same meaning as set forth in [WIC Section 16501](#) and [WIC Section 16523\(a\)](#). This definition was ambiguous as the statute did not explicitly include child welfare services provided by Tribes or tribal entities despite tribes being eligible to provide BFH program services. AB 120 expands the definition of “child welfare services,” to include child welfare services “provided by a tribe, or tribal entity or agency, in accordance with the tribal law or custom if it provides at least one of the services described in paragraph (1) or (2) of subdivision (a) of [WIC Section 16501](#) and [WIC Section 16523\(a\)](#).” This clarification is necessary to ensure that child welfare services provided by a Tribe, or tribal entity or agency, in accordance with tribal law or custom, qualify as an eligible service that falls within Child Welfare Services (CWS) as defined in [WIC Section 16523\(a\)](#). Additionally, the expanded definition allows Tribes greater access to the BFH Program, thus creating an opportunity for counties and tribes to further their partnerships.

### *2. Expansion of the definition of “homeless”*

The AB 120 expands the definition of homeless to include an individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual, family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; the individual or family has no other residence; and the individual or family lacks the resources or support networks, including, but not limited to, family, friends, or faith-based or other social networks, to obtain other permanent housing ([WIC Section 16523\(d\)\(7\)](#)). This expanded definition is intended to be inclusive of, but not limited to, the elements of the Department of Housing and Urban Development’s (HUD’s) definition of “homelessness.”

This expansion to the definition of homeless allows counties to serve individuals who are homeless or at risk of homelessness as a result of various forms of violence and may increase the number of families that can be served by the BFH program.

### *3. Change to the definition of “permanent housing”*

Prior to AB 120, BFH statute defined permanent housing as “a place to live without a limit on the length of stay in the housing that exceeds the duration of funding for the program”. This limited definition was a source of confusion and did not align with housing and homelessness evidence based best practices. AB 120 clarifies that for a dwelling to be considered permanent housing, there should be no predetermined time limits on the length of stay ([WIC 16523\(f\)](#)). Therefore, counties must ensure they are applying the new definition when determining whether a family has obtained permanent housing.

### *4. Extension of the Match Required Funding Waiver*

Prior to AB 120, the requirement that grantees provide dollar-for-dollar match funds was waived from July 1, 2021, until June 30, 2024. AB 120 extends the exemption period to June 30, 2025 ([WIC 16523.1\(d\)\(1\)\(B\)](#)). A county or tribe that receives state funds for BFH shall not be required to match any funding provided from July 1, 2021, through June 30, 2025.

### *5. Adoption of BFH Regulations*

Prior to AB 120, CDSS was required to only develop regulations on specific statutory changes by July 1, 2024. AB 120 amends this requirement so that CDSS must now adopt regulations for all provisions of the program by July 1, 2024 ([WIC Section 16523.2\(b\)](#)).

## **III. TECHNICAL ASSISTANCE**

Technical Assistance (TA) is available for all grantees needing assistance planning, developing, or implementing a program. Training and TA can aid prospective and new grantees with a wide range of topics. Examples include:

- Understanding specific program eligibility rules
- Developing screening and prioritization processes for a specific program
- Creating a housing navigation and/or landlord engagement program
- Creating an effective homelessness prevention program
- Using data to understand and improve program outcomes
- Training your local workforce in skills needed to operate these programs
- Creating programs that are streamlined and administratively efficient
- Advancing equity on a systems level
- Improving collaboration with the local homeless response network

Please note that this list of potential TA topics is not exhaustive, as TA is available to assist with all aspects of program planning, development, operation, and assessment.

Requests for TA can be sent to [housing@dss.ca.gov](mailto:housing@dss.ca.gov). Grantees are also encouraged to explore available TA through the [Change Well Project](#), which supports the creation and implementation of equitable and interconnected social service programs. The Change Well Project has a team dedicated to providing TA to grantees. Grantees can request tailored 1:1 support through the technical assistance request form on the [Change Well website](#). Other resources include training modules through [a Digital Learning Platform and monthly Learning Labs on a variety of topics](#).

In some instances, grantees may be required to utilize TA to grow and improve their funded programs, including as part of CDSS-identified program improvement needs, at CDSS discretion. Grantees may utilize program funds to provide program-specific training in areas identified by the grantee or by CDSS to support continuous quality improvement.

The CDSS is committed to providing responsive TA and communication with all grantees participating in CDSS housing and homelessness programs with the goal of building trust and making programs accessible and equitable.

#### **IV. CONTACT INFORMATION**

Contact the CDSS Housing and Homelessness Division at [housing@dss.ca.gov](mailto:housing@dss.ca.gov) with any questions regarding this letter.

Sincerely,

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

HANNA AZEMATI  
Deputy Director  
Housing and Homelessness Division