

November 15, 2024

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 24-88

The purpose of this letter is to establish additional guidelines for implementing the core components of Housing First for counties opting to participate in the California Work Opportunity and Responsibility to Kids Housing Support Program (CalWORKs HSP), Bringing Families Home (BFH) program, Housing and Disability Advocacy Program (HDAP), and Home Safe program.



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November 15, 2024

ALL COUNTY LETTER NO. 24-88

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALWORKS PROGRAM SPECIALISTS
ALL COUNTY WELFARE-TO-WORK COORDINATORS
CALWORKS HOUSING SUPPORT PROGRAM COORDINATORS
ALL COUNTY CHILD WELFARE DIRECTORS
ALL CHILD WELFARE SERVICES PROGRAM MANAGERS
BRINGING FAMILIES HOME PROGRAM COORDINATORS
ALL COUNTY ADULT PROTECTIVE SERVICES
HOUSING AND DISABILITY ADVOCACY PROGRAM
COORDINATORS AND PROGRAM MANAGERS
HOME SAFE COORDINATORS AND PROGRAM MANAGERS

SUBJECT: GUIDELINES FOR INCORPORATING THE CORE
COMPONENTS OF HOUSING FIRST FOR THE CALWORKS
HOUSING SUPPORT PROGRAM, BRINGING FAMILIES HOME
PROGRAM, HOUSING AND DISABILITY ADVOCACY
PROGRAM, AND HOME SAFE PROGRAM

REFERENCE: [SENATE BILL \(SB\) 1380 \(CHAPTER 847, STATUTES OF 2016\);](#)
[WELFARE AND INSTITUTIONS CODE \(WIC\) SECTION 8255;](#)
[WIC SECTION 8256; ALL COUNTY LETTER \(ACL\) NO. ACL 19-](#)
[114, ALL COUNTY WELFARE DIRECTORS LETTER \(ACWDL\)](#)
[DATED SEPTEMBER 13, 2021; ACWDL DATED OCTOBER 15,](#)
[2021; ACWDL DATED DECEMBER 13, 2021; ACWDL DATED](#)
[FEBRUARY 11, 2022; ACWDL DATED JUNE 28, 2024; ACWDL](#)
[DATED OCTOBER 4, 2024](#)

The purpose of this letter is to establish additional guidelines for implementing the core components of Housing First for the CalWORKs Housing Support Program (CalWORKs HSP), Bringing Families Home (BFH) program, Housing and Disability Advocacy Program (HDAP), and Home Safe program (referred to as "Housing and Homelessness programs" throughout this letter), and to direct counties opting to participate in these

programs (and their contractors and subcontractors) to design and implement these programs in accordance with Housing First as outlined in this letter. This letter also provides additional, illustrative examples of practical Housing First implementation that expand upon existing examples and guidance first detailed in [ACL 19-114](#). This letter does not affect otherwise applicable landlord-tenant obligations, rights, or responsibilities. As appropriate, grantees should consult applicable rules and laws regarding the use of non-Housing and Homelessness program funds (such as federal funds) when acting as the landlord and providing housing that does not serve recipients of Housing and Homelessness programs.

BACKGROUND

[Senate Bill \(SB\) 1380 \(Chapter 847, Statutes of 2016\)](#) mandated state agencies and departments to collaborate with the California Interagency Council on Homelessness (Cal ICH) to adopt guidelines and regulations incorporating the core components of Housing First if they fund or administer “state programs” that provide housing or housing-related services to people experiencing or at risk of homelessness. As such, the following programs overseen by the California Department of Social Services (CDSS) are “state programs” that are required to operate in accordance with the core components of Housing First: CalWORKs HSP, BFH, HDAP, and Home Safe.

CDSS implemented SB 1380 by issuing [ACL 19-114](#) on December 13, 2019, which provided information about the core components of Housing First, guidance for how to adopt those core components, and examples to improve understanding and implementation of Housing First by grantees of Housing and Homelessness programs.

Housing First is an [evidence-based](#) approach to addressing homelessness that provides or connects individuals and families experiencing or at risk of homelessness to permanent housing as quickly as possible and offers supportive services as needed and requested on a voluntary basis without making housing contingent on participation in supportive services. Housing First follows the basic principle that everyone is ready for housing, regardless of the complexity or severity of their needs, and that stable housing is the foundation for achieving other goals. Other foundational principles of Housing First include:

- Housing First acknowledges that social services and care coordination are key elements of housing stability and quality of life. Housing First is not “Housing Only.”
- Housing First promotes flexibility, individualized support, client choice, and autonomy. Housing First is not “one size fits all.”
- Housing First applies across the spectrum of housing interventions, as well as other systems where adults, families, and youth experiencing or at-risk of homelessness intersect. Housing First is not limited to only one type of program model, design, or intervention.

- Supportive services are offered throughout the duration of a recipient's time in a Housing and Homelessness program, from entry at intake through discontinuance, ensuring continuous support. Housing First does not require that a recipient move into housing before being offered supportive services.

HOUSING FIRST ADOPTION AND IMPLEMENTATION

The Housing First approach and philosophy must be implemented holistically and incorporated in all aspects of program design, including in written program policies and procedures, and throughout the duration of service delivery, not just at the time of an applicant's enrollment into a program. Applying this approach comprehensively from program enrollment through discontinuance ensures that programs offer client-centered, needs-based support that enables applicants and recipients to reach their housing-related goals.

To ensure effective implementation of Housing First, grantees shall work collaboratively with recipients to develop individualized housing and services plans for all recipients after their enrollment into a Housing and Homelessness program. Housing and services plans and any related program agreements (or similar documents recipients are asked to sign) shall be consistent with Housing First. Housing and services plans shall outline the assistance and supportive services to be provided to a recipient under the Housing and Homelessness program, expectations for a recipient to carry out a minimum level of engagement in basic program functions necessary to achieve housing stability, and any other critical information. To the extent possible, each housing and services plan shall be developed collaboratively with recipients, incorporate recipient choice, and be tailored to the unique needs, goals, and strengths of each recipient, with an overall end goal of achieving stable permanent housing for recipients.

Housing and services plans shall be documented in writing and regularly revisited and updated as needed, with updates informed, whenever possible, by conversations with and input from recipients. Grantees shall document updates to the housing and services plan in writing and communicate those updates to recipients.

HOUSING FIRST CORE COMPONENTS

[Welfare and Institutions Code \(WIC\) section 8255](#) outlines the eleven core components of Housing First. These core components are listed below, along with an explanation of how grantees can apply each core component to Housing and Homelessness programs and rules and examples illustrating how each core component should be applied to program activities, services, and written program policies and procedures.

- (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."**

All Housing and Homelessness program grantees shall treat housing as an essential tool to create the stability necessary for addressing recipients' other needs, such as employment support, substance use disorder treatment, and health care access, rather than as a reward for addressing those needs, regardless of whether the recipient is using substances or participating in treatment. Housing and services plans developed for recipients after their enrollment into a Housing and Homelessness program shall not contain provisions mandating sobriety or completion of substance use disorder treatment.

For all Housing and Homelessness program grantees, regardless of whether the grantee is the landlord, neither the use of alcohol or substances nor the failure to complete or participate in substance use disorder treatment shall be the basis for determining whether an individual receives assistance through a Housing and Homelessness program, including but not limited to all of the following:

- Denying enrollment into a Housing and Homelessness program;
- Denying or deprioritizing for any housing assistance that is offered by the Housing and Homelessness program;
- Penalizing a recipient;
- Discontinuing a recipient from a Housing and Homelessness program.

For Housing and Homelessness programs where the grantee is the landlord, this core component means that grantees shall not screen out or deprioritize a recipient's application for a housing placement provided and operated by the grantee due to the recipient's sobriety, use of substances, completion of substance use disorder treatment, or participation in substance use disorder-related services.

➤ **Correct Application Example 1:**

- **Scenario:** A recipient reports to their case manager that they regularly use substances. The case manager has been engaging in housing navigation work on behalf of the recipient and identifies a unit that may be a good fit for the recipient. The case manager talks with the landlord, and the landlord informs the case manager that they only rent to tenants who are "clean and sober." The case manager decides not to recommend the unit to the recipient, continues engaging in housing navigation to find a more suitable unit for the recipient, and utilizes harm reduction techniques to help the recipient address the underlying causes of their substance use while maintaining housing security and promoting overall well-being.
- **Outcome:** This approach correctly applies Housing First because it does not require the recipient to be sober or in a treatment program to receive housing assistance.

➤ **Incorrect Application Example 1:**

- **Scenario:** A grantee "screens out" or denies enrollment of applicants with substance use disorders who have not completed a treatment program in the last

12 months. During an intake call, a grantee discourages someone who asked about a Housing and Homelessness program from applying once the grantee learns that the individual dropped out of a treatment program last month.

- **Outcome:** This approach incorrectly applies Housing First because it discouraged an applicant from pursuing enrollment due to a lack of treatment program completion.

(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’.”

For Housing and Homelessness programs where the grantee is the landlord, this core component means the grantee shall ensure that recipients who are applying for a permanent housing placement provided and operated by the grantee are not rejected for having barriers to housing that might present or be perceived as a lack of “housing readiness,” as described in this core component.

For all Housing and Homelessness program grantees, regardless of whether the grantee is the landlord, grantees shall not deny applicants enrollment into a Housing and Homelessness program or deny housing assistance to recipients solely based on behaviors that the grantee interprets as indicating a lack of “housing readiness,” as described in this core component. Grantees should utilize standardized tools and procedures to screen and assess applicant vulnerabilities and needs and identify housing barriers that could be remediated by the program, regardless of whether the housing barriers existed prior to intake or arose while enrolled in the program. Additionally, applicants and recipients who have one or more housing barriers, such as poor credit or a record of evictions, may warrant higher prioritization by a program because these barriers are indicative of higher vulnerability when compared to applicants and recipients who have no such housing barriers.

➤ **Correct Application Example 1:**

- **Scenario:** An applicant family has struggled to obtain permanent housing due to the parent’s poor credit and old criminal record and is eligible for a Housing and Homelessness program. The grantee enrolls the family and collaborates with the parent to develop a plan to provide them with credit repair services, collects and compiles documents needed to apply for housing, and refers the parent to a legal nonprofit organization offering criminal record expungement services.
- **Outcome:** This approach correctly applies Housing First principles because services to help remove and mitigate the family’s housing barriers are offered but not required, and enrollment is not denied to the applicant family based on any perceived lack of housing readiness or housing barriers.

➤ **Correct Application Example 2:**

- **Scenario:** A grantee provides a recipient at risk of homelessness who owns multiple pets with housing navigation services. Although many identified housing options have no-pet policies, the grantee prioritizes the recipient's need for their pets by diligently searching for pet-friendly housing, inquiring with landlords about their pet policies, negotiating with landlords to allow the pets, offering to pay pet deposits, and exploring other creative options like temporary pet foster care.
- **Outcome:** This approach correctly applies Housing First because the grantee explored various methods and alternatives to ensure the recipient obtains housing that is appropriate for their needs and accommodates their multiple pets. In addition, the grantee took steps to work with and address the recipient's housing barrier rather than perceiving owning multiple pets as a lack of "housing readiness" to justify reducing or discontinuing housing navigation services.

➤ **Correct Application Example 3:**

- **Scenario:** An applicant has multiple evictions on their record. The grantee recognizes that the applicant's history of evictions will be a significant housing barrier for the applicant. The recipient is deemed eligible, so the grantee enrolls the applicant in a Housing and Homelessness program. The grantee provides rental assistance while the recipient continues to work toward various goals identified in the housing and services plan they developed collaboratively upon program enrollment. However, after 12 months of enrollment, the recipient continues to struggle with meeting goals to increase their household income. As such, the grantee and recipient agree that a permanent, affordable housing subsidy is needed. The Housing and Homelessness program helps the recipient apply for the local Housing Choice Voucher (HCV) waitlist, supports the recipient with obtaining all required documentation and performing all required actions to remain eligible on the HCV waitlist, and continues to provide rental assistance and other housing-related supportive services. After a year on the waitlist, the recipient is awarded an HCV, but their lease has ended, and the recipient is unable to find a landlord willing to accept the HCV, given their history of evictions. To mitigate this housing barrier, the grantee puts together a tailored housing navigation plan, stays in regular communication with the PHA to ensure the HCV is appropriately utilized, and coordinates with the PHA on all relevant timelines. After a couple of months of this intensive housing navigation support, the recipient is able to find a new unit with their HCV. The Housing and Homelessness program helps coordinate inspections, pays for moving costs, and assists with move-in.
- **Outcome:** This approach correctly applies Housing First because the housing barriers did not lead to a denial of Housing and Homelessness program enrollment at intake or a denial of housing assistance after enrollment despite the housing barriers experienced by the recipient.

➤ **Incorrect Application Example 1:**

- **Scenario:** A grantee assesses an applicant and finds they have a credit score of 400, are unemployed with no stable source of income, and have a criminal record and an eviction judgment on their record. Despite these factors resulting in the applicant scoring highly on a vulnerability assessment at intake and the applicant being otherwise eligible for the program, the grantee rejects the applicant because the grantee, based on its past experiences, determines that these barriers will make it difficult for the grantee to find housing for the applicant.
- **Outcome:** This approach incorrectly applies Housing First because it conditions applicant enrollment on perceived “housing readiness.”

➤ **Incorrect Application Example 2:**

- **Scenario:** Same facts as Correct Application Example 2 except that instead of continuing to search for pet-friendly housing or exploring alternatives to alleviate the recipient’s housing barrier, the grantee informs the recipient that they can choose to remain with their pets or continue participating in the program, but they cannot have both. The grantee informs the recipient that housing navigation services will cease until they give up their pets because having multiple pets significantly limits the permanent housing options available to them, which makes housing navigation difficult.
- **Outcome:** This approach incorrectly applies Housing First because it denies a recipient’s access to housing navigation services due to their perceived lack of “housing readiness” (multiple pets) without consideration of the recipient’s needs and preferences (remaining with their pets). The grantee should instead work with the recipient on addressing their housing barriers while accounting for their needs and preferences.

➤ **Incorrect Application Example 3:**

- **Scenario:** Same facts as Correct Application Example 3, except that when the recipient struggles with finding a landlord willing to accept the HCV given the recipient’s history of evictions, the grantee decides to discontinue the recipient from the Housing and Homelessness program because they think it will be too difficult to continue helping the recipient with such a significant housing barrier.
- **Outcome:** This approach incorrectly applies Housing First because although the housing barrier did not lead to a denial of Housing and Homelessness program enrollment at intake, the housing barrier was later used as the rationale for discontinuance of housing assistance after enrollment.

(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.”

For Housing and Homelessness programs, this core component means that grantees shall create streamlined pathways for referrals to and from other important system partners that impact people experiencing or at risk of homelessness. Grantees can

establish a strong two-way referral network comprised of local programs, community organizations, and service providers serving vulnerable populations at risk of or experiencing homelessness through proactive outreach, engagement, and relationship building. For many grantees, this collaboration may be accomplished through partnership with the local Continuum of Care and Coordinated Entry System.

In this context, a “two-way referral network” refers to a collaborative system where local programs, community organizations, and service providers utilize proactive outreach, engagement, and collaboration to actively refer individuals and families to each other to ensure seamless access to support and resources for vulnerable populations at risk of or experiencing homelessness. Additionally, by taking a “no wrong door” approach to accepting referrals from these networks, grantees can improve their relationships with community partners while ensuring applicants and recipients are connected to needed assistance in a client-centered, low-barrier way.

- **Example:** Important networks and partners that grantees can collaborate with include but are not limited to:
 - Continuums of Care (CoCs) and the Coordinated Entry System (CES);
 - Access centers, shelters, respite centers, and street outreach clinics;
 - Public Housing Authorities (PHAs);
 - Public benefit agencies;
 - Health care systems and providers, hospitals, emergency response providers, and Medi-Cal Managed Care Plans (MCPs);
 - Mental and behavioral health services networks;
 - Criminal legal systems, jails and prisons, legal aid organizations, and court systems;
 - Child welfare systems, family resource centers, transitional age youth and foster youth advocacy networks, education systems, and school liaisons;
 - Adult Protective Services;
 - Community Care Licensed Adult and Senior Care facilities networks and other licensed residential care facilities networks;
 - Disability advocacy and rights networks;
 - Area Agencies on Aging (AAAs), Regional Centers, and Independent Living Centers (ILCs);
 - Domestic Violence (DV) and Intimate Partner Violence (IPV) systems;
 - Employment and workforce development agencies and programs;
 - Substance use disorder treatment and recovery programs;
 - Veteran services organizations and support networks.
- **Correct Application Example 1:**
 - **Scenario:** A grantee operating HDAP dedicates time to program improvement and system development to establish relationships with the local hospital, re-entry organizations, public benefit agencies, licensed adult and senior care facilities, disability advocacy and rights networks, mental and behavioral health

services networks, AAAs, Regional Centers, and ILCs. Through relationship-building at the staff and leadership levels, the grantee institutionalizes a two-way referral process with each of these partner entities. This enables the grantee to accept referrals to HDAP from these partner entities and refer HDAP recipients to other entities for needed supports. These processes are then incorporated into written program policies and procedures.

- **Outcome:** This approach correctly applies Housing First because it includes the policy of accepting referrals from system partners frequented by vulnerable people experiencing and at risk of homelessness.

➤ **Incorrect Application Example 1:**

- **Scenario:** A grantee establishes a policy that they will only enroll applicants who request Housing and Homelessness program assistance in-person at the local human services office and will not accept referrals from external partners, including the Coordinated Entry System. An applicant family who appears eligible for a Housing and Homelessness program is referred by the local child welfare agency, but the grantee refuses to screen or conduct an intake for the family because the referral did not follow the policy.
- **Outcome:** This approach incorrectly applies Housing First by closing off the Housing and Homelessness program from referrals of any kind.

(4) “Supportive services that emphasize engagement and problem-solving over therapeutic goals and service plans that are highly tenant-driven without predetermined goals.”

For Housing and Homelessness programs, this generally means that grantees shall ensure there are opportunities for flexibility and adaptability in the program through continuously reevaluating and updating recipients’ housing and services plans with the recipient to align with the recipients’ current housing goals and preferences and account for any evolving needs and circumstances, where possible. This should also entail having adaptable and flexible tools in place to adjust housing and services plans, assistance levels, and support to meet the individualized needs of recipients throughout their enrollment. Case management should be informed by the housing goals articulated by the recipient and tailored to meet the recipient “where they are” throughout program enrollment, emphasizing collaborative problem-solving and evidence-based engagement strategies to address challenges and empower recipients to exercise autonomy, choice, and decision-making in shaping their path to stable housing.

➤ **Correct Application Example 1:**

- **Scenario:** In their first case management meeting since enrollment, a new recipient and grantee work together to develop a housing and services plan that incorporates the recipient’s preferences and goals related to housing. The grantee also considers and documents timelines and available resources for the

recipient in the housing and services plan while ensuring it remains flexible for the recipient in case adjustments are necessary. The housing and services plan includes weekly case management meetings with the recipient at the case manager's office, which was suggested by the recipient because it was convenient and easy to travel to. After a few of these meetings, the recipient expresses that the meetings are causing stress due to travel being more difficult than anticipated and feeling embarrassed about a perceived lack of progress towards permanent housing stability. The case manager and recipient work on a new plan that entails biweekly phone calls instead of weekly in-person meetings, and the case manager travels to meet the recipient at a mutually agreed upon time and location when in-person meetings are more appropriate.

- **Outcome:** This approach correctly applies Housing First because the grantee took a flexible approach to solve the identified issue and better meet the recipient's needs while maintaining client-centered engagement.

➤ **Incorrect Application Example 1:**

- **Scenario:** A grantee establishes that all enrolled recipients will have a requirement embedded in their housing and services plans requiring them to contact landlords about three available apartments every week, with the goal of becoming permanently housed within six months. Despite their best efforts, one recipient struggles to meet the apartment contact requirement and remains in interim housing at the six-month mark. The grantee reduces the amount of assistance provided to the recipient because they are deemed not to have satisfied their housing and services plan requirements.
- **Outcome:** This approach incorrectly applies Housing First because it is based on a rigid housing and services plan that did not adapt when the recipient faced initial challenges with meeting the apartment contact requirement. In addition, the housing and services plan was not individualized to each recipient and was based on predetermined, one-size-fits-all goals. Likewise, the rigid and inflexible apartment contact requirement incorrectly applies Housing First because it is not driven by recipient needs and preferences and is an unchangeable part of the predetermined housing and services plan for all recipients.

(5) "Participation in services or program compliance is not a condition of permanent housing tenancy."

For Housing and Homelessness programs where the grantee is the landlord, this core component means that a recipient's lack of participation in any of the voluntary supportive services offered by the program or not complying with program expectations and responsibilities shall not, in and of itself, result in eviction from a permanent housing placement provided and operated by a grantee as part of a Housing and Homelessness program.

For all Housing and Homelessness program grantees, regardless of whether the grantee is the landlord, this core component means that program enrollment and

continued receipt of housing assistance shall not be conditioned on a recipient's participation in supportive services, which are voluntary for all Housing and Homelessness programs. When recipients opt not to participate in supportive services, grantees should instead utilize evidence-based engagement strategies to build trusting relationships with recipients, ensure recipients understand the service options available to them and the benefits of different options, identify and support the removal of barriers to participation in supportive services, and otherwise help facilitate and support voluntary participation in supportive services.

However, while supportive services are voluntary, achieving housing stability does require a minimum level of engagement from program recipients. The steps involved in achieving housing stability cannot move forward without such engagement, so grantees may establish reasonable minimum expectations and responsibilities for applicants and recipients to complete basic program functions. Basic program functions include, but are not limited to, requiring applicants and recipients to contact, engage with, and provide information to the grantee to confirm eligibility, gauge interest in housing assistance, and collect information to make prioritization and service delivery decisions. These expectations and responsibilities must be necessary to enable recipients to achieve housing stability, necessary for the grantee to complete basic program functions, flexible to accommodate the varying needs of recipients, and not create unnecessary barriers to program access. Grantees shall embed these expectations and responsibilities in written program policies and procedures and housing and services plans and discuss them with applicants and recipients during intake and throughout enrollment.

Grantees shall not automatically deny, reduce, or discontinue a recipient's housing assistance for not fulfilling a program expectation or responsibility established by the grantee. When operating Housing and Homelessness programs, grantees should expect recipients will have life events or other external circumstances that create barriers and interfere with their ability to fulfill established expectations and responsibilities. As such, grantees should set and communicate the expectation that the goal of Housing and Homelessness programs is to achieve housing stability, rather than perfect adherence to program expectations or responsibilities. Grantees should problem-solve to find ways to help recipients engage in established expectations and responsibilities. This includes providing the tailored, trauma-informed, whole-person support needed to meet recipients where they are at, build trust with them, and help remove barriers to engagement through ongoing case management strategies that leverage effective case management practices and evidence-based engagement strategies, including but not limited to [progressive engagement](#) using a [trauma-informed](#) and [harm-reduction](#) approach, as well as [motivational interviewing](#) techniques. These approaches and techniques shall also be comprehensively embedded in written program policies and procedures.

Recipients who do not fulfill established expectations and responsibilities shall be provided the opportunity to come into alignment with applicable expectations and

responsibilities, and grantees shall provide support to the extent possible to enable recipients to meet established expectations and responsibilities. However, if a recipient continually refuses to fulfill established expectations and responsibilities despite a grantee's reasonable and documented attempts to support the recipient in understanding and complying with these expectations and responsibilities through ongoing case management and evidence-based engagement strategies, it may be appropriate for the grantee to discontinue the recipient from the program. If the grantee determines a program discontinuance is appropriate, they shall identify other programs or housing relocation options for the recipient, if available, and make a warm hand-off accordingly.

Grantees may re-enroll former recipients at any time, in line with existing enrollment policies and eligibility rules, should the former recipient decide that they want to re-enroll in a program. Grantees shall not institute policies that exclude former recipients from program enrollment due to lack of engagement or similar factors during prior enrollment in the program. Grantees shall apply the same assessment, prioritization, and enrollment processes towards former recipients that are applied to all other program applicants.

Please note:

- This letter does not impact tenant responsibilities under landlord-tenant laws or the program requirements of other funding streams that are braided with Housing and Homelessness programs to serve recipients. To the extent feasible, grantees should make recipients aware of applicable rules tied to other funding streams and programs that are also serving the recipient.
- The rule above preventing grantees from automatically denying, reducing, or discontinuing a recipient's housing assistance for not fulfilling a program expectation or responsibility established by the grantee does not prevent grantees from discontinuing recipients that threaten or inflict violence or harm toward grantee staff or fellow recipients.

➤ **Correct Application Example 1:**

- **Scenario:** A recipient works with the grantee to establish a rental assistance schedule outlining the duration and depth of rental assistance to be provided under the program to help the recipient stabilize in permanent housing. The recipient agrees to the rental assistance schedule but declines meetings with the case manager and does not discuss possible supportive services or their progress towards housing goals with the grantee. The grantee uses evidence-based engagement strategies, including engaging peer navigators and flexible meeting options, to build trust. The recipient eventually agrees to participate in supportive services, but they are still mistrustful of government, so they continue to reject engaging in case management meetings. The grantee continues providing rental assistance and supportive services while continuing to encourage but not require case management participation.

- **Outcome:** This approach correctly applies Housing First because although participation in services was encouraged, it was not required or made a prerequisite for housing assistance.

➤ **Correct Application Example 2:**

- **Scenario:** A recently enrolled family is receiving rental assistance through a Housing and Homelessness program, but the parents have rejected the grantee's efforts to establish regular case management meetings with them. Rather than end the rental assistance or discontinue the family from the program, the grantee takes an individualized, client-centered approach to building trust with the parents through evidence-based engagement strategies. Over time, the parents agree to establish case management meetings, allowing the grantee to further engage with the family and offer additional supportive services tailored to their goals and needs.
- **Outcome:** This approach correctly applies Housing First because the housing assistance is not conditioned on participation in supportive services. Rather, the grantee used evidence-based engagement strategies to encourage and enable (but not require) participation in supportive services.

➤ **Correct Application Example 3:**

- **Scenario:** A grantee has a contact policy requiring recipients to be responsive to check-in requests at regular intervals, with the form and cadence of check-ins determined by recipient preferences. These check-ins are used to share important updates and information, reassess housing assistance or supportive service needs, and gauge continued interest in the program. One recipient has not made contact after several attempts by the grantee via the recipient's preferred communication methods, including phone calls, texts, and at-home visits. After an extended period of time with no contact despite many efforts, the grantee discontinues the recipient from the program. The grantee's policy allows the recipient to re-apply for the program if they reestablish contact with the grantee and remain eligible for the program.
- **Outcome:** This approach correctly applies Housing First because the program discontinuance was based on the recipient being completely unresponsive to many contact attempts over an extended period of time. In addition, the grantee's policy for re-enrollment ensures that former recipients do not have prior non-responsiveness issues held against them if they reestablish contact in the future.

➤ **Incorrect Application Example 1:**

- **Scenario:** A grantee enrolls a recipient at risk of homelessness into a Housing and Homelessness program, and the recipient agrees to participate in housing-related case management meetings and housing navigation services aimed at securing permanent housing. However, the recipient refuses to participate in tenancy skills education classes as part of their case management. The grantee

believes the recipient will not succeed in permanent housing without taking these tenancy skills education classes, so they end housing navigation services for the recipient.

- **Outcome:** This approach incorrectly applies Housing First because it conditions housing assistance (housing navigation) on participation in supportive services (tenancy skills education classes), which are voluntary under Housing First.

➤ **Incorrect Application Example 2:**

- **Scenario:** A grantee's written Housing and Homelessness program policies and procedures require recipients to call their case manager once every seven days and attend in-person case management meetings once a month, without exception or flexibility. A recipient receiving housing-related direct financial assistance maintains contact with the grantee, as required, for their first few months in the program. However, one month, the recipient calls their case manager eight days late. As a result of this violation of the contact policy, the grantee automatically discontinues the recipient's housing-related direct financial assistance without first contacting the recipient to understand the reasons for the delayed contact, without offering reasonable supports needed to maintain contact, and without offering the recipient an opportunity to remain enrolled in the program.
- **Outcome:** This decision incorrectly applies Housing First because it conditions housing assistance (housing-related direct financial assistance) on program compliance (strict adherence to the contact policy) through automatic discontinuance without the opportunity to understand and work through potential barriers to contacting the grantee within the requested seven-day period. In addition, the contact policy is an incorrect application of Housing First because it is rigid, one-size-fits-all, and not clearly required to maintain basic program functions. The policy fails to be client-centered because it does not incorporate the recipient's needs and preferences nor provide reasonable flexibility for instances where recipients have a good reason for not making contact, such as medical emergencies.

➤ **Incorrect Application Example 3:**

- **Scenario:** A grantee enrolls a recipient who is at risk of homelessness into a Housing and Homelessness program to provide them with rental assistance to maintain their tenancy and housing stability. Before the grantee will issue rental assistance, the grantee requires the recipient to sign a housing and services plan that includes a clause requiring participation in job training and substance use disorder treatment. The grantee refuses to issue the rental assistance and discontinues the recipient from the program after the recipient does not participate in the job training and substance use disorder treatment.
- **Outcome:** This decision incorrectly applies Housing First because it conditions housing assistance (rental assistance) on participation in voluntary supportive services (the job training and substance use disorder treatment). Furthermore,

the grantee in this example did not build rapport with the recipient or utilize effective evidence-based engagement strategies to learn more about the recipient's specific needs and preferences to better tailor the supportive services and the housing and services plan. In addition, housing and services plans cannot contain supportive services participation requirements that contradict Housing First.

(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.”

For Housing and Homelessness programs where the grantee is the landlord, this core component means that grantees shall ensure that leases for permanent housing placements provided and operated by the grantee contain the same rights and responsibilities as standard private market leases under all applicable laws.

For Housing and Homelessness programs where the grantee is not the landlord, grantees shall not encourage or require recipients to sign leases or other housing agreements that do not contain the same rights and responsibilities as standard private market leases under all applicable laws. Instead, grantees should help recipients navigate to permanent housing options with leases that are not more restrictive than comparable private market leases. Grantees should also help recipients negotiate with landlords on lease terms, where possible, to remove or modify any problematic lease language.

All Housing and Homelessness program grantees, regardless of whether the grantee is the landlord, should work with county counsel to ensure that lease agreements comply with all applicable laws. Grantees can also help recipients understand their rights as leaseholders by offering tenant skills education and prevent and remedy landlord-tenant and neighbor conflicts through mediation and conflict resolution skills training. When habitability, discrimination, or landlord-tenant issues arise, grantees should support the recipient through landlord engagement or refer the recipient to legal services and fair housing organizations.

➤ **Correct Application Example 1:**

- **Scenario:** After locating a permanent housing unit through housing navigation, a grantee and a recipient review the lease and find numerous behavior and activity restrictions that are far stricter than the average private market lease. The recipient and grantee try to negotiate these terms with the landlord but are ultimately unsuccessful. Worried that this foreshadows a challenging and potentially unsustainable tenancy, the grantee and recipient agree to continue the housing search elsewhere, with the grantee continuing to provide housing navigation services and other assistance as needed.

Outcome: This approach correctly applies Housing First because the grantee is supporting the recipient in exercising autonomy about whether to accept a

housing placement and in continuing their housing search rather than accepting a lease with unusually strict behavior and activity restrictions. In doing so, the grantee is helping to ensure that the recipient will have a lease that reflects the standard rights and responsibilities typical of a private rental market tenant.

➤ **Incorrect Application Example 1:**

- **Scenario:** A grantee acquires and begins operating a housing complex through [Homekey](#), with half of the units reserved for [Homeless Housing, Assistance, and Prevention Program \(HHAP\)](#) recipients, who in this instance need lighter-touch stabilization assistance, and the other half of the units reserved for HDAP recipients, who need more intensive wraparound supports and services. The grantee, determining that the HHAP recipients are closer to housing stability and that the HDAP recipients need additional support, gives the HDAP recipients leases with significantly stricter terms than the HHAP recipient leases, which mirror standard private market leases.
- **Outcome:** This approach incorrectly applies Housing First (in the context of HDAP) because a Housing and Homelessness program grantee is requiring recipients to sign leases that are significantly stricter and do not provide them the same rights and responsibilities as standard private market leases.

(7) “The use of alcohol or drugs in and of itself, without other lease violations, is not a reason for eviction.”

For Housing and Homelessness programs where the grantee is the landlord, grantees shall not evict recipients from permanent housing placements provided and operated by the grantee solely for the use of alcohol or drugs without other lease violations.

Additionally, for Housing and Homelessness programs where the grantee is not the landlord, grantees should help recipients navigate to permanent housing options with leases that are not more restrictive than comparable private market leases regarding alcohol and drugs. The grantee’s housing navigation resources and tools should support individualized housing searches. In the event that the recipient violates the lease for reasons arising from alcohol or drug use, grantees should utilize harm reduction techniques and try to work with the landlord to prevent action from being taken against the recipient due to their use of alcohol or drugs, including through landlord incentives.

➤ **Correct Application Example 1:**

- **Scenario:** After a recipient moves into a new housing unit with the help of housing navigation, the landlord believes they observe the recipient using illegal substances in a common area, which is a violation of the lease. The landlord then contacts the recipient’s case manager to explain the situation and warn that the recurrence of the illegal substance use will result in an eviction for the recipient. The case manager contacts the recipient to better understand the situation and utilizes harm reduction techniques to minimize the risk of eviction.

The case manager creates a proactive plan for next steps in case illegal substance use occurs and an eviction is filed, including pursuing landlord mediation, offering landlord incentives, and establishing a tailored housing navigation plan to help the recipient quickly move out of the unit to avoid an eviction judgment.

- **Outcome:** This approach correctly applies Housing First because the grantee was ready to provide landlord mediation to diffuse the situation, quickly employed harm reduction techniques to reduce the risk of eviction, and proactively planned actions to mitigate the impact of a potential future lease violation on the recipient.

➤ **Incorrect Application Example 1:**

- **Scenario:** A recipient who was recently released from prison is enrolled into a Housing and Homelessness program. One of their parole conditions requires them to abstain from drug and alcohol use. During a routine check-in, the grantee becomes aware that the recipient has violated their parole by using drugs recently and decides to discontinue their housing assistance, and the recipient is subsequently evicted. The program discontinuance was based on the assumption that the parole violation makes the recipient ineligible for the Housing and Homelessness program.
- **Outcome:** This approach incorrectly applies Housing First because the recipient's use of substances, in and of itself, led the grantee to end the rental assistance being provided through a Housing and Homelessness program, resulting in the recipient's eviction. The recipient's parole violation should not have impacted their receipt of Housing and Homelessness program assistance. Instead, the grantee should have engaged harm reduction techniques to reduce the negative impacts the parole violation could have had on the recipient's housing stability.

(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.”

“First-come-first-serve” and “most likely to succeed” are inappropriate methods for prioritizing applicants or recipients. Rather, grantees shall generally aim to prioritize serving the most vulnerable and high-needs individuals and families as determined through data-informed, uniform assessments and other standardized tools across program delivery, such as vulnerability assessments, service matching, and budget development tools, while keeping in mind the resources available to them when determining the appropriate caseload for their Housing and Homelessness program. Grantees should regularly review and update these assessments and tools to ensure

they are achieving their goal of identifying the most vulnerable and high-needs individuals and families.

Data-informed triage assessment tools and methods can be developed and implemented in collaboration with local Continuums of Care and Coordinated Entry Systems and should include assessment of vulnerability and need to help match recipients to the most appropriate housing programs and supportive services. Results of data-informed triage assessment tools allow for programs to prioritize recipients for assistance and triage recipients who have lower needs and can be referred instead to other community resources.

➤ **Correct Application Example 1:**

- **Scenario:** A grantee works with the Coordinated Entry System to standardize and align Housing and Homelessness program vulnerability and service matching assessments with those utilized in other programs across the community, streamlining the referral process and making prioritization and program matching easier. The grantee even works with the Coordinated Entry System to recognize the unique needs of older adults, people with disabilities, and families, and is able to assess these areas within the coordinated assessment tool used across the system.
- **Outcome:** This approach correctly applies Housing First because it emphasizes Coordinated Entry System collaboration and assessments based on need and vulnerability, which lend themselves to effective prioritization and service matching.

➤ **Incorrect Application Example 1:**

- **Scenario:** A grantee in a community without a robust Coordinated Entry System believes that all applicants experiencing homelessness in their community are similarly situated and, therefore, feels the fairest enrollment approach is to enroll applicants on a first-come-first-serve basis.
- **Outcome:** This approach incorrectly applies Housing First because the lack of a strong Coordinated Entry System is not justification for a first-come-first-serve enrollment approach – instead, the grantee should utilize a needs- and vulnerabilities-based assessment tool for prioritizing and matching applicants to services.

(9) “Case managers and service coordinators who are trained in and actively employ evidence-based practices for recipient engagement, including, but not limited to, motivational interviewing and recipient-centered counseling.”

Housing and Homelessness program grantees shall utilize various recipient-centered and effective case management methods and evidence-based engagement strategies such as progressive engagement, motivational interviewing, and client-centered counseling during the course of case management. These

methods shall be complemented by a broader use of trauma-informed and [harm reduction](#) strategies to meet the recipient's needs and circumstances, which will build recipient trust and investment in the program.

Grantees should develop and implement staff training curriculum and written program policies and procedures that embed evidence-based strategies for engagement and counseling. Grantees should ensure all new and existing staff are trained on these evidence-based practices. By offering comprehensive training across all staff, grantees can foster a more knowledgeable, cohesive, and responsive workforce, ultimately improving outcomes for the community and enhancing recipients' trust in programs.

➤ **Correct Application Example 1:**

- **Scenario:** A case manager trained in effective case management practices holds a meeting with a recipient to address possible challenges underlying the recipient's recent absence from previously established case management appointments. During this meeting, the grantee asks open-ended questions to better understand the recipient's challenges and talks through collaborative ways to alleviate any barriers. Additionally, the case manager assists the recipient in identifying their goals based on their unique strengths and suggests small, manageable steps, like brief phone check-ins in place of in-office appointments, so that the recipient can continue to engage.
- **Outcome:** This approach correctly applies Housing First because the grantee utilized effective case management techniques by asking open-ended questions, addressing barriers by offering client-centered solutions, and devising a flexible approach to case management in alignment with the recipient's preferences and needs.

➤ **Incorrect Application Example1:**

- **Scenario:** In an effort to improve internal cohesion and efficiency, a grantee establishes a policy that all case management must be delivered according to certain set criteria for every recipient, without exception. One of the criteria requires that recipients always meet in person with their case manager, with no exceptions allowed. Case managers are dissuaded from deviating from the policy to maintain consistency in the delivery of case management services.
- **Outcome:** This approach incorrectly applies Housing First because it does not allow for any of the flexibility or tailoring entailed in evidence-based strategies for recipient engagement.

(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.”

By fostering an environment of trust, acceptance, and support utilizing a [harm reduction](#) philosophy, grantees can empower recipients to make informed decisions about their health and well-being, ultimately promoting stability and wellness within the context of housing. Recipients shall receive support that acknowledges their substance use as a part of their lives while promoting safety, well-being, and access to appropriate treatment options if desired.

Grantees can provide or refer recipients to community-based harm reduction services aimed at improving housing stability, including education on risk reduction like overdose prevention and safer substance use practices, access to harm reduction supplies like substance test kits, peer support programs, and holistic supportive services that could address underlying factors contributing to substance use, such as mental health. Utilizing harm reduction strategies can better address the underlying causes of substance use while maintaining individuals' housing security and promoting overall well-being.

➤ **Correct Application Example 1:**

- **Scenario:** A grantee conducts a home visit for a case management meeting with a recipient. The case manager observes empty alcohol containers throughout the recipient's home as well as on the balcony shared with their neighbor. The case manager empathetically listens to the recipient to understand why they are using substances, discusses safer strategies for substance use, and provides referrals for voluntary evidence-based supportive services for substance use treatment. Additionally, the grantee advises the recipient on modeling good tenant and neighbor practices, including respectfully maintaining shared spaces and keeping potentially disruptive or unwanted behavior to a minimum.
- **Outcome:** This approach aligns with Housing First because it entails nonjudgmental conversations around substance use and substance use mitigation, including strategies for reducing the impact of substance use on neighbors while encouraging, but not requiring, evidence-based treatment, in alignment with the harm reduction philosophy.

➤ **Incorrect Application Example 1:**

- **Scenario:** A recipient has a history of substance use disorder and occasionally uses alcohol and other drugs in their unit. During a requested home visit, the case manager notices open alcohol bottles and other drug paraphernalia, hands the recipient a flyer on safer drug and alcohol use practices and treatment options and does not offer any further support or discussion on the topic. Instead, the case manager chastises the recipient and tells them that they may end up being evicted if they do not cease using alcohol and drugs. Moreover, the case manager does not offer resources or education (beyond the flyer) on safer alcohol or drug use practices or treatment options.

- **Outcome:** This approach incorrectly applies Housing First because the case manager did not employ a harm reduction approach during the visit and instead used judgmental language that did not accept alcohol and drug use as part of the recipient's life. Furthermore, simply handing over a flyer without a supportive conversation reinforces punitive messaging rather than fostering a safe and non-judgmental environment, as required under harm reduction strategies.

(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.”

For Housing and Homelessness programs where the grantee is the landlord, grantees, in consultation with county counsel, shall abide by all applicable state and federal civil rights law related to disability and requirements to provide reasonable accommodations and allow reasonable modifications in housing. On a case-by-case basis as appropriate, grantees may use program funds for reasonable costs necessary to make housing units they operate for recipients habitable and accessible. Additionally, grantees should assist recipients with disabilities with locating housing units that meet their specific disability-based needs and preferences.

Additionally, for Housing and Homelessness programs where the grantee is not the landlord, grantees should have appropriate processes in place to incorporate recipient accessibility needs into housing navigation services and communicate and ensure that landlords and recipients with disabilities are made aware of the rights and responsibilities of housing providers to accommodate recipients with disabilities. On a case-by-case basis and as appropriate, grantees may use program funds for reasonable costs necessary to make housing units for recipients habitable and accessible. Written program policies and procedures shall include process guidance on how to evaluate case-by-case options and available assistance to accommodate recipients' individual needs and preferences due to their disability.

➤ **Correct Application Example 1:**

- **Scenario:** A newly enrolled recipient with mobility issues requires physical modifications in their housing to live independently and safely and discusses this with their case manager. The recipient asks their landlord to install grab bars in their bathroom, as without the grab bars, the home would not be suitable in the long term for the recipient. After repeated requests to the landlord, the landlord suggests the recipient “work with” their existing setup. The case manager contacts the landlord and works with the landlord to facilitate approval of the modification (installation of the grab bars), and the grantee agrees to pay for the cost of installation.
- **Outcome:** This approach correctly applies Housing First because the grantee worked with the landlord to ensure the home was equipped to meet the recipient's specific mobility needs.

➤ **Incorrect Application Example 1:**

- **Scenario:** A recipient with disabilities moves from interim housing to a Rapid Re-housing-supported unit that is identified by the grantee. The permanent housing unit does not have any of the features needed to accommodate the recipient's disabilities. The recipient had shared information with the grantee about their housing preferences and accessibility needs, but the grantee had informed the recipient that the unit was the only option, and they had to take it or leave it.
- **Outcome:** This approach incorrectly applies Housing First because the placement was made despite the recipient's expressed accessibility needs.

TECHNICAL ASSISTANCE AND RESOURCES

Technical assistance (TA) is available to assist with all aspects of program planning, development, operation, and evaluation, including implementation of Housing First. CDSS and its contracted TA provider, [Change Well Project](#), will continue supporting grantees in implementing Housing First and embedding its core components in Housing and Homelessness programs through additional Housing First-specific trainings, resources, and TA opportunities. CDSS expects counties to utilize all available TA, trainings, resources, and materials to ensure programs are delivered in a manner consistent with state guidance.

Grantees interested in requesting TA on Housing First should contact the CDSS by email at housing@dss.ca.gov or complete the [TA request form](#) to request support from Change Well Project. Please visit the [Change Well Project](#) website to subscribe to [newsletter updates](#) and learn more about upcoming trainings, events, and other TA opportunities. Grantees can also visit the [Change Well Project Digital Learning Platform](#) and [Advancing Housing First: Policies, Programs, and Practices](#) webpages for additional resources.

CONTACT

If you have any questions or need additional guidance regarding the information in this letter, please contact the CDSS Housing and Homelessness Division at housing@dss.ca.gov.

Sincerely,

Original Document Signed By

HANNA AZEMATI
Deputy Director
Housing and Homelessness Division

Attachment

ATTACHMENT ONE: HOUSING FIRST RESOURCES

I. HOUSING AND HOMELESSNESS DIVISION LETTERS

For more information about program requirements, eligibility, and best practices, please review the following letters:

- **Home Safe:**
 - [ACWDL dated October 15, 2021](#)
- **BFH:**
 - [ACWDL dated February 11, 2022](#)
- **HSP:**
 - [ACWDL dated December 13, 2021](#) and [ACWDL dated June 28, 2024](#)
- **HDAP:**
 - [ACWDL dated September 13, 2021](#) and [ACWDL dated October 4, 2024](#)

II. OTHER HOUSING FIRST RESOURCES

For more information about Housing First, please review the following resources and materials:

- U.S. Department of Housing and Urban Development
 - [Housing First in Permanent Supportive Housing](#)
 - [Housing First Works Spring/Summer 2023 Periodical](#)
 - [Housing First Implementation Resources](#)
- U.S. Interagency Council on Homelessness (USICH)
 - [Housing First Training: Putting Plans into Practice in California](#)
 - [Housing First Checklist: Assessing Projects and Systems for a Housing First Orientation](#)
- California Interagency Council on Homelessness (Cal ICH)
 - [Cal ICH Guide to California's Housing First Law](#)
 - [Housing First: An Overview of Core Components and Practices Webinar](#)
- National Low Income Housing Coalition (NLIHC)
 - [Housing First: Q&A](#)
 - [The Case for Housing First](#)
- The Corporation for Supportive Housing (CSH)
 - [Housing First and Access to Housing](#)
 - [Housing First: What It Is and How It Is Implemented in California](#)

- Pathways to Housing – Housing First University
 - [Housing First Model vs. Traditional Housing models](#)
 - [The Five Key Principles of Housing First](#)
 - [Basics of Housing First](#)
 - [Housing First Myths](#)