February 11, 2022

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY WELFARE DIRECTORS LETTER

The purpose of this letter is to notify All County Welfare Directors and Federally Recognized Tribal Governments in California of funds available for counties and tribes to establish, continue, and expand housing and homelessness assistance through the Bringing Families Home (BFH) program. The Budget Act of 2021 (Senate Bill 129, Chapter 69, Statutes of 2021) appropriated a total of $92.5 million in General Fund for BFH in Fiscal Year 2021-22. This letter announces a noncompetitive allocation for all fifty-eight (58) counties and one continuing tribe and a set aside for tribal governments.

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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February 11, 2022

LETTER TO ALL COUNTY WELFARE DIRECTORS AND FEDERALLY RECOGNIZED TRIBAL GOVERNMENTS IN CALIFORNIA

TO: ALL COUNTY WELFARE DIRECTORS
ALL FEDERALLY RECOGNIZED TRIBAL GOVERNMENTS IN CALIFORNIA

SUBJECT: **NOTICE OF FUNDING FOR THE BRINGING FAMILIES HOME PROGRAM**

REFERENCE: **Assembly Bill (AB) 135 (Chapter 85, Statutes of 2021); Senate Bill (SB) 129 (Chapter 69, Statutes of 2021); AB 1603 (Chapter 25, Statutes of 2016); SB 80 (Chapter 27, Statutes of 2019); AB 74 (Chapter 23, Statutes of 2019); Welfare and Institutions Code (WIC) 16523-16523.1; WIC 16501; WIC 10618.8**

The purpose of this letter is to notify All County Welfare Directors and Federally Recognized Tribal Governments in California of funds available for counties and tribes to establish, continue, and expand housing and homelessness assistance and prevention through the Bringing Families Home (BFH) program. This letter also summarizes recent statutory changes enacted through Assembly Bill (AB) 135 (Chapter 85, Statutes of 2021), outlines continuing BFH requirements and guidance, and provides new guidance as a result of expanded funding and changes to program statute.

The Budget Act of 2021 (Senate Bill (SB) 129 (Chapter 69, Statutes of 2021)) appropriated a total of $92.5 million in General Funds (GF) for BFH for Fiscal Year (FY) 2021-22, available for expenditure July 1, 2021 through June 30, 2024. An additional $92.5 million are expected to be available for BFH in FY 2022-23 as reflected in the proposed FY 2022-23 Budget. This All County Welfare Directors Letter (ACWDL) announces FY 2021-22 noncompetitive allocations for all fifty-eight (58) counties and one continuing tribe. Additional information on the Tribal Government Set-Aside will be issued under separate cover.

PROGRAM BACKGROUND

The BFH program provides housing supports to families receiving child welfare services who are experiencing or at risk of homelessness, thereby increasing family reunification and preventing foster care placement. In 2016, BFH was established by Assembly Bill (AB) 1603 (Chapter 25, Statutes of 2016) with a $10.0 million appropriation available over three years and awarded to twelve grantees. The Budget Act of 2019 (Senate Bill 109 (SB) (Chapter 363, Statutes of 2019)) authorized an additional $25.0 million in one-time funding available for expenditure from July 1, 2019 through June 30, 2022, and was awarded to 22 counties and one tribe.

I. FY 2021-22 BUDGET UPDATES AND USE OF FUNDS

The Budget Act of 2021 (SB 129) appropriated $92.5 million in General Fund (GF) for BFH in FY 2021-22. The California Department of Social Services (CDSS) will utilize five percent of the appropriated funds to administer and implement the program, ensuring that participating counties and tribes are provided technical assistance and support. The remaining $87.875 million in funding, which is match exempt, is available for noncompetitive allocations to all 58 counties and one continuing tribe, as well as a $5.0 million tribal set aside.

Additionally, continuing grantees may also continue to use any unspent funds allocated in FY 2019-20 via CFL 19/20-67 through June 30, 2022. **These funds continue to require a dollar-for-dollar match.**

A. Noncompetitive Allocation

This letter announces the statewide noncompetitive allocation of $82.875 million for all 58 counties and one continuing tribe based on a local need methodology. Refer to Attachment Five for the allocation table. The match requirements for the BFH noncompetitive allocations announced in this letter have been waived.

1. Instructions for Accepting Funds

Grantees wishing to accept all or a portion of the noncompetitive allocation amount listed in Attachment Five shall review, sign, and return the Director's Certification in Attachment Six. Grantees choosing to decline the total noncompetitive allocation must also submit a signed certification. Completed certifications should be sent to housing@dss.ca.gov. Groups of counties and/or tribes wishing to propose a regional BFH should consult the guidelines in Attachment Seven.

The CDSS encourages the review and acceptance of funds as soon as possible. **All grantees must submit a Director's Certification by March 25th, 2022 to receive funds**. If a grantee is declining an allocation, a Director's Certification must still be submitted indicating that funds are being declined.
Funds that are not accepted on or before March 25th, 2022 will be allocated to grantees that indicate they can accept additional funds, as indicated in the Director's Certification in Attachment Six, and consistent with the methodology described below.

2. Noncompetitive Allocation Methodology

The noncompetitive allocation is distributed based on statewide need. The methodology includes the following, in order of weighted importance:

- the percent of the statewide total of families experiencing homelessness living in the county (2020 Homelessness Point in Time Count);
- the percent of the statewide Child Welfare Services caseload (CWS/CMS data);
- the percent of the statewide total of households with severe cost burden living in the county (i.e., household income less than 50 percent of the area median income and paying more than 50 percent of income toward rent or mortgage).

A funding floor equal to $250,000 or the FY 2019-20 allocation for continuing grantees, whichever was greater, was applied to the noncompetitive allocations for all 58 counties. An additional metric of need was applied to the current regional program between Humboldt County and Yurok Tribe: "Humboldt County & Yurok Tribe" in Attachment Five. CDSS will be providing grantees technical assistance to support expanding and establishing new BFH programs. Please see additional information about technical assistance in Attachment Two.

3. Noncompetitive Allocation Claiming and Fiscal Information

A statewide County Fiscal Letter (CFL) for noncompetitive allocations will be released shortly after the deadline for Director's Certifications. Claiming instructions for noncompetitive awards are included in Attachment Four.

Grantees participating in the BFH program as of June 30, 2021, should continue to operate existing programs and will be allowed to claim expenditures back to July 1, 2021, to avoid any break in services.

4. Proposals for Regional Programs

Groups of counties and/or tribes may request to form a new regional BFH. Regional programs rely on a shared administrative structure or program functions, which can create efficiency in many communities. Counties and tribes in rural communities, communities with a multi-county Continuum of Care (CoC), grantees with regional Homeless Housing, Assistance and Prevention (HHAP) awards, or neighboring tribal communities may particularly benefit from a regional BFH.

Considerations and instructions are outlined in Attachment Seven. A consultation meeting with CDSS is required before a regional agreement can be formalized. Regional allocations can include the sum of the noncompetitive allocation amounts for participating counties and tribes, plus an additional $150,000, to the extent funds are available, to incentivize regional collaboration.

B. Tribal Noncompetitive Set-Aside

The CDSS will make $5.0 million available to Federally Recognized Tribal Governments in California interested in establishing a BFH. These funds are exempt from match requirements. CDSS will, upon tribal consultation, release instructions under separate cover for new or continuing Tribal Governments that are interested in establishing or expanding a BFH.

Note: Tribal Governments with an existing BFH are included under "Humboldt County & Yurok Tribe" as described above and listed in Attachment Five.

II. FY 2021-22 STATUTORY CHANGES

The changes summarized below reflect amendments to Welfare and Institutions Code (WIC) Sections 16523-16523.2 and Section 10618.8 pursuant to AB 135 (Chapter 85, Statutes of 2021). Additional support for establishing and scaling BFH programs will also be provided, including technical assistance and training opportunities.

Attachments One and Two provide additional information regarding updated BFH requirements, eligibility, and core components. Counties and tribes interested in establishing a new program are encouraged to review this letter, the related All County Welfare Directors Letters (ACWDLs) available on the CDSS website, and the references linked at the beginning of this letter to understand the full program scope.

A. Expansion of Eligibility

Section 16523(c) and (d) clarified and expanded eligibility for families experiencing or at risk of homelessness.

Section 16523(c) was amended to clarify that eligible families include families where the living situation cannot accommodate the child or multiple children in the home, and that families at risk of homelessness may include families that have not yet received an eviction notice.

Section 16523(d) includes technical re-numbering to the definition of homelessness for BFH to better align with the Department of Housing and Urban Development (HUD) definition of homelessness.

See Attachment One for a more in-depth definition of eligibility and Attachment Three for more details on prevention targeting and prioritization.

B. Other Statutory Changes

Section 16523.1(d) – Waived match requirements

Counties and tribes are exempt from the dollar-for-dollar match requirements for the $87.875 million in one-time General Fund awarded to grantees between July 1, 2021 through June 30, 2024.

Section 16523.2 – Regulations

The CDSS must adopt BFH regulations by July 1, 2024. Until regulations are adopted, All-County Letters and similar instructions will have the same force and effect of regulations. CDSS looks forward to working with grantees and stakeholders to develop and adopt program regulations before this deadline.

Section 10618.8 – Use of funds for data contracts

The CDSS may use a portion of the program expansion funds to support a formal evaluation, data collection, and technical assistance contracts. These activities will be contracted and conducted at the state level and in coordination with the legislature, stakeholders, and client advocates. CDSS must report on these contracts and efforts annually to the Legislature.

Additional information regarding program data and evaluation requirements can be found in Attachment Two.

III. OTHER RELEVANT BUDGET UPDATES

The FY 2021-22 State Budget also includes investments in programs across the state that may assist BFH participants, including the CalWORKs Housing Support Program (HSP), emergency shelter under Project Roomkey, capital funding under Homekey (Round 2), and several other investments to support people experiencing or at risk of homelessness. Refer to Attachments Two and Three for additional information and resources that should be considered as grantees expand and adapt local BFH programs.

Please contact the CDSS Housing and Homelessness Branch at 916-651-5155 or housing@dss.ca.gov with questions regarding this letter or BFH.

Sincerely,

Original Document Signed By

JULIE MCQUITTY, Acting Branch Chief
Housing and Homelessness Branch

Attachments:

- Attachment One: Program Eligibility
- Attachment Two: Program Requirements and Core Components
- Attachment Three: Prevention Guidance and Resources
- Attachment Four: Fiscal and Budget Considerations
- Attachment Five: FY 2021-22 Noncompetitive Allocation Amounts
- Attachment Six: Director's Certification, Instructions and Funding Conditions
- Attachment Seven: Information on Establishing Regional Programs

ATTACHMENT ONE: PROGRAM ELIGIBILITY

This attachment provides an overview of Bringing Families Home (BFH) participant eligibility.

The BFH eligibility is broadly defined in Welfare Institution Code (WIC) Section 16523(c) as families or individuals who meet all three conditions:

(1) Receive child welfare services at the time eligibility is determined,
(2) Are homeless, at risk of homelessness, or in a living situation that cannot accommodate the child or multiple children in the home, including individuals who have not received an eviction notice; and,
(3) Voluntarily agree to participate in the program.

Details regarding the first and second eligibility requirements are further described below.

Additional information about program screening and prioritization are also further described below and in Attachments Two and Three.

I. PROGRAM ELIGIBILITY RELATED TO CHILD WELFARE SERVICES

In order to be eligible for BFH, an individual or family, including but not limited to biological parents, guardians, or kinship guardians (e.g. applicable grandparents), must receive child welfare services at the time eligibility is determined. The BFH WIC Section 16523(a) defines "child welfare services" for BFH as having the same meaning as defined in WIC Section 16501. The child welfare service component types for BFH eligible families may include but are not limited to Family Reunification, Family Maintenance, Emergency Response services, or families in receipt of voluntary supervision to prevent the need for the child's or children's removal.

II. PROGRAM ELIGIBILITY REQUIREMENTS REGARDING HOUSING STATUS

The BFH eligibility requires that the family is either A) homeless, B) at risk of homelessness, or C) in a situation that cannot accommodate a child or multiple children in the home.

Each of these categories are further defined below.

A. Definition of 'Homeless'

The BFH definition of homelessness broadly includes unsheltered homelessness, families living in shelters or temporary living situations, and those who are imminently homeless due to a residence being lost within 14 days. The AB 135 amended WIC Section 16523(d) to align the definition more closely with the federal Department of Housing and Urban Development (HUD) definition of homelessness.

The updated BFH definition of homelessness as reflected in WIC Section 16523(d) is provided below for reference:

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence.

(2) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including, but not limited to, a car, park, abandoned building, bus station, train station, airport, or camping ground.

(3) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements, including hotels or motels paid for by federal, state, or local government programs for low-income individuals or by charitable organizations, congregate shelters, or transitional housing.

(4) An individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where the individual temporarily resided.

(5) An individual or family who will imminently lose their housing, including, but not limited to, housing they own, rent, or live in without paying rent, are sharing with others, or rooms in hotels or motels not paid for by federal, state, or local government programs for low-income individuals or by charitable organizations, if any of the following criteria are met:

(A) The primary nighttime residence will be lost within 14 days, as evidenced by any of the following:

(i) A court order resulting from an eviction action that notifies the individual or family that they must leave within 14 days.

(ii) The individual or family having a primary nighttime residence that is a room in a hotel or motel and where they lack the resources necessary to reside there for more than 14 days.

(iii) Credible evidence indicating that the owner or renter of the housing will not allow the individual or family to stay for more than 14 days, and any oral statement from an individual or family seeking homeless assistance that is found to be credible shall be considered credible evidence for purposes of this clause.

(B) The individual or family has no subsequent residence identified.

(C) The individual or family lacks the resources or support networks needed to obtain other permanent housing.

(6) Unaccompanied youth and homeless families with children and youth defined as homeless under any other federal statute, as of the effective date of this program, who meet all the following:

(A) Have experienced a long-term period without living independently in permanent housing.

(B) Have experienced persistent instability as measured by frequent moves over that long-term period.

(C) Can be expected to continue in that status for an extended period of time because of chronic disabilities, chronic physical health or mental health

conditions, substance addiction, histories of domestic violence or childhood abuse, the presence of a child or youth with a disability, or multiple barriers to employment.

Note: Domestic Violence and Adequate Nighttime Residence

Families may be considered homeless and lack an adequate nighttime residence pursuant to WIC Section 16523(d)(1) if individuals or families are fleeing or attempting to flee domestic violence, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family if they have no other residence and lack the resources or support to obtain other permanent housing.

B. Definition of At Risk of Homelessness

Changes made pursuant to AB 135 (Chapter 85, Statutes of 2021) now allow grantees to serve eligible families at risk of homelessness including families that have not yet received an eviction notice as well as families where the living situation cannot accommodate a child or multiple children.

For the purposes of BFH, a family is considered "at risk of homelessness" if they meet all three of the following requirements:

(1) are experiencing housing instability, defined as, housing instability that places them at risk of becoming homeless including those who have not yet received an eviction notice;

(2) have no subsequent permanent residence secured; and

(3) lack resources or support networks needed to stabilize their unique housing situation and secure subsequent permanent housing.

This definition of "at risk of homelessness" is inclusive of, but not limited to the HUD definition of "at risk of homelessness" under 24 Code of Federal Regulations section 91.5. This means participants who meet the HUD definition of "at risk of homelessness" shall be deemed "at risk of homelessness" under the definition set out in this section.

This definition is distinct from the definition of homelessness due to a family who will imminently lose their housing.

Please see additional information about common factors that may place a family at risk of homelessness in Attachment Three, Section One.

C. Definition of "Living Situation that Cannot Accommodate a Child"

A living situation cannot accommodate a child or multiple children if it meets all three of the following requirements:

- the parent or guardian's nighttime residence would not be an adequate or appropriate long term housing placement for a child or children due to living situations that jeopardize the physical health, mental health, safety and/or well-

being of the child, as well as situations where a lease, living arrangement, or because tenancy would be terminated for the family if the child or children were to live in the home;

- have no subsequent permanent residence secured, and;
- lack resources or support networks needed to stabilize their unique housing situation and secure subsequent permanent housing.

Case Examples

Example 1: A parent receiving Family Reunification services is housed and is not at imminent risk of losing their housing. Throughout the child welfare case, the live-in-landlord notifies the parent that the family would not be able to remain in the housing after reunification. The parent does not have the necessary resources to identify or secure subsequent housing. The family may be served by BFH.

Example 2: A parent receiving Family Reunification services is stably housed but the court has identified the parent's roommate does not pass the necessary background check and/or the living situation would not be adequate for the children to reside in. The parent does not have the necessary resources to identify or secure subsequent housing. The family may be served by BFH.

Example 3: A parent is receiving Family Maintenance, in-home services. Through program service assessments and Child Family Team meetings, it has been identified the family is housed with a family member further jeopardizing the mental health and well-being of the children as well as progress towards the family's child welfare case plan. It is determined that the living situation can no longer accommodate the child without risking potential Child Welfare Services involvement, and it is determined that the parent does not have the necessary resources to identify or secure subsequent housing. The family may be served by BFH.

D. At-Risk Self-Attestation

Families and individuals shall be allowed to self-attest that they meet the definition of "at risk of homelessness" set out in this section, including that the living situation cannot accommodate a child or children. No additional verification or documentation demonstrating that a family meets the definition of "at risk of homelessness" is needed; grantees shall not require further evidence for the purposes of BFH enrollment. This self-determination assumes that families in receipt of child welfare services are likely already more vulnerable to homelessness than the general population.

Once a family has met the "at risk of homelessness" definition in this section, grantees may assess for other criteria indicative of vulnerability related to risk of homelessness for further prioritization, if needed.

III. SCREENING AND PRIORITIZATION

Programs must utilize equitable and standardized assessment strategies to determine each family's housing and service needs, match appropriate housing services, and further prioritize program services, if needed.

Consistent with homeless assistance best practice, programs should utilize the equitable and structured assessment and screening processes to prioritize services for families with the highest service needs and vulnerabilities, if needed. Every effort should be made to serve all BFH-eligible families experiencing homelessness given expanded program funds.

Note: For the purposes of prioritization or tracking spending on homelessness prevention, anyone who meets the definition of "living situation that cannot accommodate a child" may also be considered at risk of homelessness.

Additional information about program assessments and prioritization is available in Attachment Two. Additional information on common factors that may place a family at risk of homelessness is available in Attachment Three, Section One.

ATTACHMENT TWO: PROGRAM REQUIREMENTS AND CORE COMPONENTS

This attachment provides an overview of BFH and the core service components of the program. Counties and tribes interested in establishing a new program are encouraged to review this information, related All County Letters (ACLs), and guidance linked throughout this attachment to understand the full scope of the program.

Program requirements are outlined in WIC Sections 16523-16523.2. All services must utilize trauma-informed and client-centered practices. Attachment One of this letter provides information specific to the expansion of participant eligibility. Please contact housing@dss.ca.gov with any questions or to request technical assistance.

I. PROGRAM OVERVIEW

Pursuant to WIC section 16523.1(c), BFH funding must be used to support projects that utilize evidence-based housing interventions across the full continuum of housing service needs to meet the varied needs of families, whether they are experiencing homelessness or are at risk of homelessness. Evidence-based and promising models include, but are not limited to:

- **Rapid Rehousing**: The National Alliance to End Homelessness defines rapid re-housing (RRH) as "an intervention designed to help individuals and families to quickly exit homelessness, return to housing in the community, and not become homeless again in the near term. The core components of a rapid rehousing program are housing identification, move-in and rent assistance, and rapid re-housing case management and services." With BFH-supported RRH services, a family secures a rental unit, often on the private market, and is provided with rental assistance and other evidence-based services including but not limited to trauma-informed case management and housing retention services. Services are provided, as needed, until a family achieves housing stability or is transitioned to other longer-term housing support programming if needed.
- **Supportive Housing:** Supportive housing is a model that combines affordable housing with trauma-informed services to support family stability and well-being. Supportive housing is best matched with families whose heads of households are experiencing homelessness, are at risk of homelessness, or are inappropriately staying in an institutional setting and may be facing multiple barriers to employment and housing stability. Supportive housing often entails providing available housing and services as long as a family may choose to participate. Supportive housing is designed to serve those who would not be able to stay housed without a wide range of supportive services. Supportive housing may include single site housing, integrated housing, scattered site units, or long-term set asides and should include coordinated housing and wrap-around services to meet the ongoing needs of individuals and families. Please see Supportive Housing Outcomes – Casey Family Programs for additional information on Supportive housing.
- **Targeted Prevention Services:** Preventative services and assistance are varied and can include any preventative measure that will save a tenancy, help families regain stability in their current housing, or move and achieve stability in a new housing location. This may include rental or utility arrears, late fee

payments, first and last month's rent and/or security deposits, ongoing rental assistance, landlord mediation, repairs, connection to housing stabilization services, habitability/accessibility improvements, and housing navigation. Evidence-based and promising prevention models should use strategies such as those detailed in Attachment Three.

Note: Additional information about allowable service components across these models, including use of interim housing, are further described below under Core Service Components.

II. REQUIRED SERVICE COMPONENTS

Grantees operating a BFH program must provide housing-related supports directly to program participants, or through a contracted partner, as applicable. Housing-related supports available to participating families shall include, but not be limited to, housing-related case management, housing navigation, housing-related direct financial assistance, and housing stabilization services. While BFH must offer the following service components, the duration, order and types of services received may vary by BFH participant, dependent on an assessment of participant need and choice. Services provided must take into account input from the family, based on the needs of the family, and in coordination with other services being provided by child welfare services, tribes, family resource centers, family courts, and/or other service providers. Coordination should occur at the participant and program level, inclusive of other related efforts such as child welfare case plans. In the event that an individual or family served by BFH should need subsequent housing assistance not available through BFH, a warm handoff to an appropriate alternative source of housing support should be provided before cessation of BFH housing services.

A. Core Service Components

The BFH core service components are detailed below and should be used to support the delivery of evidence-based and promising housing models such as rapid re-housing, supportive housing or homelessness prevention services. The following service types may overlap and may not be considered mutually exclusive.

1. Housing-related Case Management:

The BFH must offer housing-related case management services, consistent with Housing First principles and evidence-based models, to assist with achieving housing stability. As per WIC Section 16523.1(c)(2)(C), grantees should incorporate "motivational interviewing and trauma-informed care to build relationships with a parent or guardian."

Housing-related case management should be person-centered, trauma-informed, and provided in a manner consistent and in coordination with the child welfare service. This plan and may include, but is not limited to, the following activities to assist BFH participants in achieving and maintaining housing stability:

- developing a trusting relationship which utilizes appropriate cultural/linguistic supports and adaptations;
- coordinating all components of a family's housing service plan;
- coordinating with the child welfare case manager and court-ordered service plans;
- working with family and community to identify any and all available supports related to housing stability;
- providing various forms of in-depth problem solving related to housing stability including but not limited to housing-budget development;
- assisting families in applying for other public assistance benefits to support housing stability, including assistance in accessing rent relief programs such as Emergency Rental Assistance Program;
- assisting families in accessing physical and behavioral health services in order to support housing stability; and
- providing connections to benefits advocacy programs, workforce development programs, and/or access to other low-cost resources in order for BFH families to achieve or maintain housing stability.

The BFH housing-related case management should complement and coordinate with, but not replace or supplant, child welfare service plans, including court-ordered case plans. A family or individual's participation in BFH case management is voluntary, and clients should not be penalized or disenrolled from BFH due to failure to attend appointments or meet with a case manager. The BFH case management and support may extend beyond child welfare case management in support of housing retention and family stability. If reunification or maintenance is successful, families may need to continue receiving BFH support to achieve housing stability. If reunification is not successful, it is expected that programs will transition the individual or family off of BFH services and complete a warm handoff for other resources and services in the community.

2. Housing Navigation:

As per WIC Section 16523.1(c)(2)(B), BFH grantees must provide housing navigation services. Housing navigation assists participating individuals and families in finding, applying for, securing, and moving into, interim and permanent housing, as needed. Housing navigation should also employ evidence-based tools, such as person-centered, trauma-informed care.

Examples of housing navigation that should be provided as part of the BFH program include, but are not limited to:

- landlord engagement, including outreach and appreciation events to recruit landlords to work with BFH families;
- searching for housing based on family's housing preferences and needs, as well as ensuring safety and habitability for children;
- building a resource list of available units and referring families to unit availability; according to their preferences for both interim and permanent housing options;

- transportation to housing location activities;
- assistance in completing housing applications and documentation as needed including but not limited to: preparing for the application process; assistance with advocating with landlords on behalf of the households; attending meetings between the landlord and the household to assist; and attending/supporting the lease signing and understanding tenant requirements and rights through the process.
- coordination with the local public housing authority and advocating for availability of affordable housing vouchers for BFH families;
- ensuring quality of housing placements; and
- assistance in making connections to permanent supportive housing.

3. Housing-Related Direct Financial Assistance:

As per WIC Section 16523.1(c)(2)(D), BFH grantees must provide housing-related financial assistance, including rental assistance, security deposit assistance, utility payments, moving cost assistance, and interim housing assistance while housing navigators are actively seeking permanent housing options for the family. Direct financial assistance incudes any cost paid out on behalf of the participant related to securing or maintaining housing. Direct financial assistance in the program budget should be maximized to ensure that families are provided housing or prevented from entering homelessness as quickly as possible. Assistance with interim housing, including but not limited to hotel, motel or bridge housing, should be available until permanent housing is available and should include housing navigation services to ensure participants are able to move into permanent housing as quickly as possible.

Examples of direct financial assistance includes, but is not limited to, any of the following:

- costs associated with rental assistance
- rental backpay and arrearages
- application fees
- landlord incentives
- security and utility deposits
- first and last months' rent
- interim housing, including hotel/motel stays or master-leased units
- emergency shelter
- emergency financial assistance toward a specific crisis threatening housing stability provided pursuant to evidence-based practices in homeless assistance and prevention
- provision of basic housing items and resources to make the home habitable to obtain/maintain housing stability (i.e., furniture and appliances)
- time-limited transportation vouchers necessary to obtain or maintain housing stability
- costs associated with moving or relocating, including storage fees for a reasonable period of time, if needed
- costs associated with supportive housing

4. Housing Stabilization:

As per WIC Section 16523.1(c)(2)(E), BFH grantees must provide housing stabilization including ongoing tenant engagement, case management, public systems assistance, legal services, credit repair assistance, life skills training, and conflict mediation with landlords and neighbors. Housing stabilization services ensure, once housed, a family's housing is safe, sustainable, and supports the safety and well-being of children. It is often delivered in conjunction with direct financial assistance.

Examples of housing stabilization services and assistance may include, but are not limited to, any of the following:

- provision or referral to legal assistance
- eviction prevention
- referral to life skills training
- tenant education and engagement
- public systems assistance
- conflict mediation with landlords and neighbors
- credit repair
- referral to employment services or benefits advocacy
- referrals to cultural and linguistic supports and services

B. Program Design and Staffing Considerations

It is best practice that the Child Welfare Services case worker, BFH case manager, and BFH housing navigator be separate roles within the BFH program, when able, but still maintain close communication and coordination. This cross-role communication and coordination is essential to ensure that the services provided are client-centered and are able to meet client needs effectively. The feasibility of role separation and specifics of these role interactions may vary by program and community, allowing for flexibility and innovation at the local level.

Additionally, programs may hire staff that are specifically responsible for facilitating coordination, whether that be coordination among staff, between programs, or with the local homelessness and child welfare systems of care.

C. Prioritization and Assessment

Pursuant to WIC Section 16523.1(c)(2)(A), grantees must conduct “an assessment of each family’s housing and service needs, including a plan to assist them in meeting those needs, using an assessment tool developed in the local community or an assessment tool used in other jurisdictions.“

Grantees must utilize equitable and standardized assessment strategies to determine each family’s housing and service needs, match appropriate housing services, and further prioritize program services, if needed.

Programs may not allow individual case managers to determine prioritization on a case-by-case basis. It is critical that assessment and prioritization criteria are consistent and not subject to the bias of an individual case manager or staff. Grantees should include their screening and prioritization frameworks in written program policies to ensure consistent application across the program and to assist CDSS in understanding best practices across the state.

Program screening and assessments should complement, be in coordination with, and leverage both the child welfare service assessment tools and techniques, as well as those within the broader local homelessness system including the Continuum of Care. This screening and assessment process should include assessment of housing instability, the health and safety of the child's living situation, and risk of further child welfare service needs, and this process should be implemented consistently across the program. Multi-Disciplinary Teams, Child and Family Team meetings, as well as thoughtful and collaborative conversations with the family should be employed as part of assessing and addressing the adequacy of a living situation and in turn, the family's housing and service needs.

Child welfare agencies and local housing systems should collaborate to identify appropriate points for implementing necessary assessments to ensure equitable access to housing services for families involved in child welfare services. Service assessments of all BFH-referrals should occur as soon as possible in order to provide immediate and urgent housing services whenever needed.

Assessment tools often fulfill a broad range of purposes beyond service matching. Consider these distinct goals when choosing an assessment tool or process. Prioritization or assessment processes should incorporate the following principles, regardless of the tool used:

- Applied consistently across the program and should not rely on the social worker's individual determination of who to serve.
- Incorporate factors that are evidence-based or promising best practices, such as targeting services to those most at risk of homelessness.
- Delivered and framed in an easy-to-understand and trauma-informed manner that centers the client's needs, including the timing of the assessment components or delivering in multiple stages if the client is in crisis and/or hesitant to engage. Grantees are strongly encouraged to use data that may already have been collected to inform the assessment process and to avoid repetitive or traumatic questions.
- Adopt a racial equity lens and framework. The Centre for Social Data Analytics and the Government Alliance for Race and Equity recommends testing the assessment process against questions such as: Is the assessment tool equally predictive and useful for all racial groups? When applying the tools, what will this mean for a person? Who will gain and who will be burdened? What information has already been gathered about how the tool impacts people of color?
- Eliminate barriers to entry and participation, versus being a tool to primarily screen people out. Adapt processes to this end as needed.

- Be used to assist BFH families in obtaining housing that prioritizes client choice taking into account recipient needs and preferences.
- Offers and provides reasonable accommodations for people with disabilities.
- Be in coordination with broader service systems including child welfare and housing systems of care.

To ensure that funding remains prioritized for those with the highest vulnerabilities, CDSS expects that grantees use the majority of funds to support people experiencing homelessness.

D. Housing First

The BFH must operate in accordance with Housing First. WIC Section 8256 requires that all state-funded housing programs operate in accordance with the core components of Housing First as enumerated in WIC Section 8255 and further outlined in ACL 19-114.

Housing First means that individuals should be connected to housing or housing supports immediately without preconditions and unnecessary barriers. While providers must actively engage eligible families to participate in services, participants may choose not to participate, making service participation voluntary, client choice shall be respected, and applicants shall not be rejected on the basis of income, past evictions, substance use, or any other behaviors that some may interpret as a lack of "housing readiness."

The CDSS has developed and previously requested that grantees complete a Housing First Self-Assessment to support grantees in assessing their adherence to and adoption of Housing First and identify areas for development. CDSS reserves the right to request that grantees complete a Housing First Self-Assessment throughout the technical assistance process. This may be requested from grantees establishing new programs or when a Housing First practice requires improvement or refinement. As an example, a Housing First Self-Assessment for the Bringing Families Home Pilot can be found under Attachment Five of ACWDL dated September 5, 2019 and was developed using:

- The Housing First core components in WIC Section 8255
- The United States Interagency Council on Homelessness (USICH) Housing First checklist
- The Department of Housing and Urban Development (HUD) Housing First Assessment Tool
- The Corporation for Supportive Housing (CSH) checklist

E. Collaboration and Integration with the Local Homeless Response System

Partnerships and collaboration are critical to the success of BFH. Grantees operating BFH are required to collaborate and coordinate with the greater homelessness response system, including participation in the local homeless Continuum of Care (CoC) and local Coordinated Entry System (CES), as CES is locally available. Coordination across local homeless service systems as well as the child welfare system is critical to

effectively and holistically serve BFH families as well as blend and maximize community resources. The BFH programs should be actively involved in, accept referrals from, and provide referrals to the local CES and participate in planning or performance processes to improve efficiency across systems and ensure appropriate referrals are occurring. While BFH programs should accept referrals from the local CES, BFH-eligible families should not be "screened out" of BFH based on their CES acuity score unless this is the grantee's chosen prioritization assessment, and all eligible families cannot be served.

Services provided must also be in coordination with other services being provided by child welfare services or tribes, family resource centers, family courts, and other service providers dedicated to the stability and wellbeing of the family. These may include but are not limited to, behavioral health and emergency response systems, educational systems, domestic violence agencies, juvenile dependency courts, legal aid organizations, and other relevant networks to maximize available funding and connect participants to additional resources and supportive services.

Collaboration with local Public Housing Authorities (PHAs) is also highly recommended. BFH programs are encouraged to utilize any available housing vouchers, such as HUD's Family Unification Program vouchers or other housing resources offered by the PHA to provide housing to eligible BFH families. Grantees should also partner with tribal housing authorities and housing and homelessness agencies within incorporated cities.

Information on program collaborations will be requested in future program updates. Grantees may use BFH funds to establish specific positions to support the coordination of these systems.

F. Racial Equity

The CDSS requires grantees to commit to addressing racial disproportionality for people experiencing homelessness and ensuring equitable provision of services for Black and Indigenous individuals and other people of color who are disproportionately impacted by homelessness. Black and Indigenous people experience homelessness at significantly higher rates than whites, largely due to long-standing historical and structural racism. In California, Black people account for seven percent of the general population, but represent more than 31 percent of people experiencing homelessness. The disproportionality in homelessness is a by-product of systemic inequity – the racism continues to perpetuate disparities in critical areas that impact rates of homelessness, including poverty, segregation/rental housing discrimination, incarceration, and access to health care. Additionally, children of color are overrepresented in the child welfare system including Black and Indigenous children despite requirements of the Indian Child Welfare Act.

Additionally, per Government Code Section 8899.50, each county grantee must also operate its BFH in a manner that affirmatively furthers fair housing. This means that BFH must be operated in a way that takes "meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."

Grantees should review demographic data of child welfare and BFH participants and understand how program demographics compare to the racial and ethnic makeup of low income, unhoused families, and/or families in receipt of child welfare services. This information can provide initial insight on racial inequity within programming and should inform strategies for addressing racial equity. Grantees should utilize and track data to inform equitable services for families of marginalized populations including Black and Indigenous children who are overrepresented in the child welfare system. Grantees should review the reports and resources below for examples of how housing and homelessness programs have incorporated racial equity into programming. Grantees are encouraged to seek meaningful input and participation from current and former BFH recipients, including recipients of color, that go beyond identifying disparities to try to identify causes of such disparities from individuals with lived experiences. Additionally, CDSS will provide technical assistance opportunities to help counties address racial equity within BFH programming. The BFH funds can be used to support efforts such as a racial equity analysis or plans for BFH.

Grantees are encouraged to review the following reports and resources related to racial equity:

Reports

- Racial Inequalities in Homelessness, by the Numbers
- Supporting Partnerships for Anti-Racist Communities (SPARC) Phase One Study Findings
- A Brief Timeline of Race and Homelessness in America
  Report and Recommendations of the Ad Hoc Committee on Black People Experiencing Homelessness

Resources

- Equity-Based Decision-Making Framework
- Framework for an Equitable COVID-19 Homelessness Response
- Advancing Racial Equity through Assessments and Prioritization (HUD)
- CA Housing and Community Development's Guidance on Affirmatively Furthering Fair Housing
- CA Business Consumer Services and Housing Agency's data portal
- The Corporation for Supportive Housing (CSH) Race Equity in Housing

III. PROGRAM ACCOUNTABILITY

A. Technical Assistance

Training and technical assistance (TA) will continue to be offered by CDSS for all grantees to help establish, develop, and improve their programs and to facilitate information-sharing across BFH programs. The TA and training opportunities include one-on-one calls, training as part of regional or topic-specific cohorts, state-wide learning sessions, in person or virtual learning forums, strategy meetings, process

mapping, case conferencing, etc. CDSS may designate specific TA or training as mandatory, including for specific staff, such as program leads.

The TA and training topics may include strategies for strengthening outreach, case management, housing navigation, prevention services, as well as local workforce development, streamlining administrative efficiencies, advancing equity on a systems level, data collection, performance monitoring and improving collaboration with the local homelessness response system. The TA and training may be conducted by CDSS or a CDSS designated contractor or partner. Additionally, programs may utilize BFH funds to provide program-specific training in areas identified by the grantee or CDSS to support continuous quality improvement.

Based on feedback from current grantees, CDSS plans to establish cross-program opportunities for TA engagement. For example, CDSS will host joint office hours to address questions across the suite of CDSS funded programs, rather than exclusively program specific meetings. Grantees are encouraged to provide feedback to CDSS on how we can structure meetings that address the needs of grantees and service providers operating the programs. Please send feedback to housing@dss.ca.gov.

B. Data Reporting and Integration

Data collection, progress monitoring, and outcome reporting are essential and mandatory elements of BFH. Data needs should be considered when deciding on staffing, training, and program design. Successful data integration goes beyond completing program data reports and requires building relationships with Homeless Management Information System (HMIS) administrators, service providers, and other entities that are part of the data integration process.

1. Bringing Families Home 17 Quarterly Report

Grantees are required to report individual level and aggregate data on a quarterly basis via the BFH 17 report which is to be submitted via the Secure Automated File Exchange website. Additional information about the BFH 17 data requirements are available upon request to housing@dss.ca.gov. Updated instructions for the BFH 17 will be released under separate cover. Grantees may be required to complete and submit additional data as specified by CDSS, and any additional data requirements established by CDSS will be done after consultation with the County Welfare Directors Association of California (CWDA), tribes, and advocates for clients. Applicants may request additional information about BFH data reporting requirements by emailing housing@dss.ca.gov.

2. Homeless Management Information System

Effective July 1, 2020, all grantees operating a BFH are required to ensure participants served by BFH are entered into their local Homeless Management Information System (HMIS). CDSS requires this practice to ensure BFH is aligned with the broader homelessness field and to build for future data collection efficiencies in BFH.

*3. Assembly Bill 977 Data Reporting Requirements **(NEW)***

Assembly Bill 977, Chapter 397, Statutes of 2021 includes additional requirements of utilization of HMIS for BFH. Beginning on January 1, 2023, a county or entity operating BFH, as a condition of receiving state funds, shall enter the Universal Data Elements (Items 3.01-3.917) and the Common Data Elements (Items 4.02-4.20 and Item W5 of the Individual Federal Partner Program Elements) drawn from the United States Department of Housing and Urban Development Homeless Management Information System Data Standards. The BFH grantees should follow HUD guidance on HMIS project set-up for BFH as an HMIS project and collect the appropriate data elements. Grantees should collaborate with their CoC's HMIS lead to ensure proper project setup. Any grantee that does not already collect and enter these data into the local HMIS shall, upon request, receive technical assistance and guidance from staff of the California Interagency Council on Homelessness, and as available, from federal partners, including, but not limited to, the United States Department of Housing and Urban Development. To request technical assistance, grantees may either contact the Council directly at HCFC@BCSH.ca.gov or they may send their request to Housing@dss.ca.gov and CDSS staff will coordinate the facilitation of any necessary technical assistance between the grantee and Council staff. Additional guidance regarding AB 977 requirements and implementation will be provided under separate cover.

4. Formal Statewide Evaluation

Grantees must also participate in activities related to any formal BFH evaluation, such as submitting data and logic models, conducting data reviews and cleaning, or participating in interviews, surveys and focus groups. Grantees are reminded that they may use BFH funds to support these requirements related to and in support of a formal evaluation.

C. Program Planning and Updated Requirements (NEW)

As described in the main body of this ACWDL, CDSS is providing counties and tribes the opportunity to accept noncompetitive allocations. Therefore, as a condition of receiving these funds, grantees will be required to provide regular program updates to demonstrate use of program funds consistent with program guidance and requirements. CDSS will request a program update using a state-provided template to be distributed six months after the FY 2021-22 funds are accepted and annually thereafter.

D. Program Performance and Evaluation

Grantees are expected to regularly measure, monitor, and communicate program impact and performance. Establishing clear targets and collecting data to measure progress is part of this process. Further guidance on program metrics will be provided as needed. The BFH programs are encouraged to consistently track progress on process and outcomes metrics such as, but not limited to:

- Number of families referred and approved for BFH
- Number of families permanently housed who retain housing for 6 and 12 months
- Child welfare service component changes while families are enrolled in BFH
- Number of families with improved service receipt and connection in BFH

- Participant satisfaction metrics
- Equity data, including:
    - race and ethnicity of participants,
    - disability status of participants,
    - sexual orientation and gender identity of participants,
    - primary language of participants, and
    - geographic location/distribution where housing is preserved or obtained

There are other indicators that may be helpful in evaluating program performance and impact, such as length of time between referral and enrollment, between enrollment and placement in interim housing, or number of participants housed and unhoused at program exit. These metrics may be drawn from data reported in the BFH 17 and/or other sources available to the grantee. Client stories and other qualitative information can also communicate impact, though these should be shared with client consent, dignity, and in accordance with all applicable privacy laws. CDSS recommends grantees track and review other relevant metrics related to local program needs and impact and will provide further guidance, including through technical assistance, on how to set and monitor program performance indicators.

The CDSS will conduct ongoing monitoring of program performance using the data, claiming information, and program updates submitted by grantees. Consistent with evidence-based programming, CDSS aims to utilize outcomes data to inform future funding. Therefore, grantees are encouraged to use data to conduct their own program management, oversight, and continuous quality improvement.

E. Program Compliance

Should CDSS become aware that a grantee is not operating the BFH consistent with statutory requirements or formal guidance issued by CDSS, the Department will notify the grantee that they shall amend their program within a specified timeline in order to come into compliance. CDSS will provide technical assistance to support grantees and to ensure that programs are operated consistent with evidence-based practices and may request more regular program updates to reflect program compliance. CDSS, in consultation with CWDA, or in consultation with the Tribe, in the case of a Tribal grantee, reserves the right to reallocate funds if a grantee is unable to comply with program requirements within a reasonable amount of time.

Examples of non-compliance may include, but are not limited to, failing to offer housing support and assistance as described in WIC Section 16523.1, within this ACWDL and ACWDL dated September 5, 2019, or violating housing first requirements as described in WIC Section 8255 and 8256.

The CDSS acknowledges that program goals and targets, including budgeting, may be subject to change given the dynamic nature of homeless assistance. If a grantee is not able to meet the target of families to serve or is not maximizing direct financial assistance, CDSS would offer additional technical assistance to the grantee to help achieve best or promising practices in these areas.

1. Notice of Program Interruption to California Department of Social Services

Grantees must notify CDSS in writing at least 30 days in advance of any temporary or permanent interruption or end to BFH services and operations for any reason, including fully spending their allocation.

IV. ADDITIONAL STATE AND FEDERAL RESOURCES TO SUPPORT BRINGING FAMILIES HOME CLIENTS

The FY 2021-22 California State Budget also includes investments in programs across the state that may assist BFH clients. For more information on funding sources to leverage in support of BFH, please visit the California Interagency Council on Homelessness (Cal-ICH), website and reference the Guide to Strategic Use of Key State and Federal Funds document. Grantees are also encouraged to leverage expanded funding, services, and staff made available to other programs within the local Department of Social Services, such as the CalWORKs Housing Support Program, CalWORKs Homeless Assistance program, and the Housing and Disability Advocacy Program. Additional resources that may support BFH clients are listed below, for reference.

A. CDSS Housing Resources

- **CalWORKs Housing Support Program**

  The Budget Act of 2021 appropriated $285.0 million for the CalWORKs Housing Support Program (HSP), including the annual, ongoing appropriation of $95.0 million, as well as a one-time appropriation of $190.0 million available for encumbrance or expenditure over multiple years, to foster housing stability for families experiencing or at risk of homelessness in the CalWORKs program. Grantees should consider transfers to, or co-enroll with, HSP for eligible BFH families.

- **CalWORKs Homeless Assistance**

  The CalWORKs Homeless Assistance (HA) Program was established to help families in the CalWORKs program meet the costs of securing or maintaining permanent housing or to provide emergency shelter when a family is experiencing homelessness. The HA includes both temporary HA, which helps families pay the costs of temporary shelter, and permanent HA, which provides financial assistance to prevent eviction or help families pay a security deposit for permanent housing. Eligible families may receive either temporary or permanent HA, or both, once in a 12-month period, with certain exceptions. Grantees should consider transfers to HA for their families exiting BFH.

- **AB 429: CalWORKs-Funded Family Reunification Services**

  Assembly Bill (AB) 429, permits continuation of CalWORKs services to parents after removal of their children from the home by the Child Welfare Service Agency (CWSA). These CalWORKs-funded Welfare-To-Work services are part of a Family Reunification (FR) plan established by the county CWSA in conjunction with the Court and may continue for up to 180 consecutive days, during which time the children are considered temporarily absent from the home. The BFH administrators

should collaborate with local CalWORKs administrators to ensure programs are complimentary and coordinated in addressing family needs.

- **Project Roomkey**

  Project Roomkey was established in March 2020 as part of the state response to the COVID-19 pandemic. The purpose of Project Roomkey (PRK) is to provide non-congregate shelter options for people experiencing homelessness, protect human life, and minimize strain on health care system capacity. The PRK can be a resource for BFH families in need of urgent temporary shelter in order to protect against the risk of COVID-19. The BFH administrators should collaborate with local PRK administrators to ensure programs are complimentary and coordinated in addressing family homelessness within the COVID-19 pandemic.

- **Housing and Disability Advocacy Program**

  The Housing and Disability Advocacy Program (HDAP) was established to assist people experiencing or at risk of homelessness who are likely eligible for disability benefits by providing advocacy for disability benefits as well as housing supports. The HDAP offers housing related financial assistance and wrap-around supportive services, including, but not limited to: interim housing, rental assistance, housing navigation, case management, security deposits, utility payments, moving costs, legal services, and credit repair. The HDAP also provides outreach services as well as case management for connections to any additional service needs as applicable. The BFH administrators should collaborate with local HDAP administrators to ensure programs are complimentary and coordinated in addressing family homelessness.

B. Additional Housing and Supportive Services Resources

- **Homekey**

  The Budget includes $2.75 billion for Homekey (Round 2) to further expand the portfolio of housing by supporting the acquisition and conversion of properties into affordable and supportive housing or interim housing. Counties should collaborate with their CoC to identify local Homekey operators and identify potential areas of collaboration, such as unit set asides for BFH participants. Information regarding Homekey Notice of Funding Availability is on the Homekey website.

- **Homeless Housing, Assistance, and Prevention Program Rounds 3 and 4**

  The Budget includes $2.0 billion one-time General Fund to the Homeless Coordinating and Financing Council, newly renamed the California Interagency Council on Homelessness (Cal ICH), to assist counties Continuums of Care, large cities, and federally recognized tribes with addressing homelessness in their communities.

- **California Department of Education: Homeless Education**

  The McKinney-Vento Homeless Assistance Act ensures the educational rights and protections of children and youth experiencing homelessness. The McKinney-Vento Act also authorizes the funding for the federal Education for Homeless Children and Youth Program. Children, youth and their families identified by local education agencies (LEAs) may be eligible for BFH. The BFH administrators should outreach to and collaborate with local LEAs to ensure processes and program plans are

aligned and eligible families are identified and offered BFH services and that programs are complimentary and coordinated in addressing family needs.

- **Emergency Rental Assistance Program**

  The Emergency Rental Assistance Program makes funding available to assist households that are unable to pay rent or utilities. Two separate programs have been established under the American Rescue Plan Act of 2021. The funds are provided directly to states, U.S. territories, local governments, and Indian tribes. Counties use the funds to provide assistance to eligible households through existing or newly created rental assistance programs.

- **Emergency Solutions Grants Program**

  The Emergency Solutions Grants (ESG) program assists in helping people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. The ESG funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities.

- **Mental Health Services Act**

  The Mental Health Services Act (MHSA) was passed by California voters in 2004 and is funded by a one percent income tax on personal income in excess of $1 million per year. It is designed to expand and transform California's behavioral health system to better serve individuals with, and at risk of, serious mental health issues, and their families. The MHSA addresses a broad continuum of prevention, early intervention, and service needs and the necessary infrastructure, technology, and training elements that effectively support the public behavioral health system.

- **Behavioral Health Continuum Infrastructure Program**

  The Behavioral Health Continuum Infrastructure Program(BHCIP) provides Department of Health Care Services (DHCS) with funding to award competitive grants to qualified entities to construct, acquire, and rehabilitate real estate assets, or to invest in mobile crisis infrastructure to expand the community continuum of behavioral health treatment resources. A portion of the funding is available for increased infrastructure targeted to children and youth age 25 and younger. For more information, please email BHCIP@dhcs.ca.gov or visit the DHCS website.

ATTACHMENT THREE: PREVENTION GUIDANCE AND RESOURCES

In previous fiscal years, BFH programs primarily served families experiencing literal homelessness. With the FY 2021-22 expansion of eligibility and funding, grantees may now further provide BFH services to include homelessness prevention for those at-risk of homelessness and families in a living situation that cannot accommodate a child or multiple children. Program expectations and requirements for homelessness prevention services are outlined throughout this attachment.

I. EXPANSION TO SERVE FAMILIES AT RISK OF HOMELESSNESS AND PREVENTION SERVICES GUIDELINES

The WIC Section 16523 has been expanded to include families in the child welfare system who are at risk of homelessness and families in a living situation that cannot accommodate a child or multiple children, defined further in Attachment One. This expansion may significantly impact how grantees design and contract the program. Resources on eviction and homelessness prevention are included below.

Grantees should strategize how to expand BFH homelessness prevention services. Grantees are encouraged to review the homelessness prevention resources provided within this letter. Grantees should implement these program changes once familiar with homelessness prevention best practices. **Grantees are encouraged to limit overall spending on homelessness prevention assistance for families at risk of homelessness to no more than 30 percent of the noncompetitive allocation.**

A. Types of Prevention Assistance

Preventative services and assistance are varied and can include any preventative measure that will save a tenancy, help families regain stability in their current housing, or move and achieve stability in a new housing location. This may include but is not limited to rental or utility arrears, late fee payments, first month's rent and/or security deposits, ongoing rental assistance, landlord mediation, repairs, habitability/accessibility improvements, housing navigation, and diversion and problem-solving services as needed.

B. Targeting Prevention Assistance

According to the National Alliance to End Homelessness (NAEH) Prevention Targeting 101, while homelessness prevention refers to a broad category of services, research shows that homelessness prevention is more effective when targeted to the people who are most likely to fall into homelessness in the absence of preventative assistance. Therefore, among families eligible for prevention assistance due to being at risk of homelessness, grantees should prioritize serving families with the greatest risk factors for homelessness, including households with multiple risk factors as listed below. Risk factors of family separation or delays or disruptions of reunification should also be considered within the family's overall vulnerability and need for stable housing.

Also, targeting households who are closer to the anticipated loss of housing increases the chances they will actually need financial assistance from the homeless assistance

system in order to stay out of shelter. The more time a household has until their housing situation ends, the more likely it is they may find a workable solution for their current situation that does not require assistance. For this reason, households that have come seeking emergency shelter but may still be in their own housing situation are often good candidates for receiving prevention assistance.

Often, the Homeless Management Information System (HMIS) or similar data collection system can provide the data the program needs to further identify and target service needs.

Grantees should also consider targeting prevention assistance to households that have risk factors for housing instability and homelessness. Some risk factors to consider include:

- Single parent households
- Households with children under two
- Disabilities in the household
- Criminal records
- Exiting institutions
- History of conduct notices or other lease violations
- Past evictions
- Immigration status
- Pregnancy
- Number of and length of previous homeless episodes
- Immediate crises such as domestic abuse, substance abuse, or mental health crises
- Living situation prior to entering the homeless assistance system (doubled up or not being a leaseholder)
- Employment status
- Household size and membership (presence of children, their ages, etc.)

Without using available shelter data in selecting prevention assistance criteria, communities may run a higher risk of inadvertently serving people who would never have become homeless in the first place, limiting the resources available to households that truly need them. The National Alliance to End Homelessness Prevention Targeting 101 briefing includes factors for consideration for programs without access to shelter data.

C. Eviction Prevention

Eviction prevention is distinct from homelessness prevention in that it is not narrowly targeted to only those households who are at risk of homelessness due to a potential eviction. Homelessness prevention efforts often include strategies to help households build housing stability or avoid loss of housing. This may include but is not limited to short term or one-time financial assistance payments, including payment of back rent, and/or more substantial case management or other supportive services that can help families to stabilize and maintain housing stability.

Eviction prevention strategies for CDSS programs, including BFH, during COVID-19 are outlined in ACWDL dated January 14, 2021, and information on requirements for BFH to leverage federal and state rent relief resources is outlined in the section below.

II. EMERGENCY RENTAL ASSISTANCE /CALIFORNIA COVID-19 RENTAL RELIEF FUNDS

Over $5.2 billion in funding has been made available thus far to California through Emergency Rental Assistance (ERA) funding administered through the U.S. Department of the Treasury. The ERA funds, which were made available to states, tribes, and local governments, can assist households that are unable to pay rent or utilities due to COVID-related circumstances. The ERA funds administered by the State of California are referred to as the CA COVID-19 Rent Relief Program.

For eligible families who are behind on rent or utilities due to COVID-related circumstances, BFH administrators should assist participants with accessing ERA-funded rent relief before using BFH funds to pay arrears. This requirement is not intended to impact *eligibility* for BFH but is rather a requirement to utilize ERA funds for rental assistance **before** BFH funds are used, when available, and help participants in accessing ERA funds. Additionally, it is vital that BFH administrators continue to assist clients with applying for ERA-funded rent relief before using BFH funds to mitigate the risk of eviction, as application for ERA-funded rent relief extends critical eviction prevention protections under AB 832. The BFH administrators can enroll eligible families in BFH for case management and other non-arrears assistance while helping families apply for and access ERA-funded rent relief.

However, if rent relief would not prevent a loss of housing and the family is eligible for BFH, then BFH funds can be utilized to keep the family housed, including by covering arrears to prevent a loss of housing.

Situations in which rent relief would not prevent a loss of housing may include, but are not limited to, instances where:

- the temporary AB 832 protections do not apply in the family's particular situation;
- there is a pending eviction for something other than COVID-related arrears;
- receipt of rent relief will not cover the full amount of the family's arrears; or,
- the family's rent relief application is denied.

Rent relief under ERA covers up to 100 percent of unpaid back rent as well as future rent and expenses that a tenant is unable to pay due to COVID-19 impacts. This might include loss of job or reduction in hours, loss of transportation to and from jobs, loss of childcare preventing regular work, increased healthcare or other costs, and other impacts to daily life that result in reduced or no income or increased costs. Rental relief applications can be submitted by landlords, renters, or both. However, a renter must participate for relief funds to be received.

The BFH participants may also benefit from more in-depth application assistance offered through the Local Partner Network (LPN). These partners can meet with

participants at their home or another site to walk them through the process, assist with documentation and uploads, and add designees to their account to enable a third-party to help them complete the application. **To access an LPN appointment call 833-687-0967.** This phone line is open to the public and can be accessed by participants or case workers. The BFH funds may be used to provide further support to BFH clients in navigating this assistance and it is recommended that case workers help facilitate the process alongside the BFH participant.

Reference the following resources to learn more and begin an application:

- Visit the COVID-19 Rental Relief Program website for more information on the program or to begin an application.
- **Call 833-430-2122** for questions about the program and eligibility.
- **Call 833-687-0967** for assistance in a language besides English, or to receive more in-depth assistance in the application process through an LPN.

For informational brochures on the COVID-19 Rental Relief Program, please visit the CA COVID-19 Rent Relief Toolkit dropbox**.**

III. ADDITIONAL HOMELESSNESS PREVENTION RESOURCES

For more information on implementing equitable homelessness prevention activities, see:

- Framework for Homelessness Prevention – HUD
    - Overview of types of prevention programs and strategies, target population, and considerations for COVID-19.
- Homeless System Response: Prevention to Promote Equity – HUD
    - Guide to ensuring equitable access and culturally responsive prevention strategies and monitoring outcomes.
- Homeless System Response: Effective and Efficient Prevention Programs – HUD
    - Summary of strategies utilized in innovative homelessness prevention programs and interventions in multiple states
- Homeless System Response: How to Design, Scale, and Fund a Homelessness Prevention Program During COVID-19 – HUD
    - Recommended operational steps for planning, developing, implementing, and administering effective homelessness prevention strategies
- Prevent Homelessness – United States Interagency Council on Homelessness
    - Overview of crisis intervention and mitigation strategies aimed at reducing the risk of homelessness
- A New Direction: A Framework for Homelessness Prevention – Canadian Observatory on Homelessness
    - Overview of where prevention fits into broader housing and homelessness assistance, including how the Canadian housing and homelessness system is designed.
- Homelessness Prevention: A Review of the Literature – Center for Evidence-based Solutions to Homelessness

  - Overview of research on what types of interventions are most effective in preventing homelessness, key factors in predicting homelessness, and overview of existing screening models.
- Preventing Homelessness: Evidence-Based Methods to Screen Adults and Families at Risk of Homelessness in Los Angeles – California Policy Lab
  - Recommendations from the California Policy Lab on prevention targeting tools, including risk factors that may indicate risk of homelessness, modifications to make tools more user-friendly, and modifications that could be made for adults and families.
- How Child Welfare Leaders Can Support Families and Prevent Family Eviction
  - Include reports on the impact of evictions on families and present information on what child welfare and family support leaders and their communities can do now to prevent evictions for families and the importance of immediate and long-term cross-sector prevention strategies.
- Policy Brief: Leveraging the American Rescue Plan's Housing Resources to Help Families
  - A comprehensive policy brief for service providers on how you can leverage the housing resources provided by The American Rescue Plan Act, signed into law by President Biden in March 2021.

ATTACHMENT FOUR: FISCAL AND BUDGET CONSIDERATIONS

I. BUDGET GUIDELINES

The BFH grantees must provide housing-related supports including, but not limited to housing navigation, case management, housing-related direct financial assistance, and housing stabilization services. Grantees must minimize administrative costs while maximizing direct services and housing related financial assistance within the program budget. Grantees must budget the program appropriately in order to ensure every participant has access to housing support and assistance.

The budget categories are defined as follows:

- **Administrative costs** may include, but are not limited to, program administrative staff (including program supervision and data tracking staff), general administration and costs necessary for the proper administration of the program, data tracking including HMIS licenses, overhead, and program development activities.
- **Direct program service costs** include case management staff, housing navigation staff, and other program staff or operational costs not included within administrative costs.
- **Direct financial assistance to support housing** represents all housing related costs paid out on behalf of the participant. This includes costs associated with rental assistance, application fees, security deposits, first and last months' rent, housing rehabilitation and modification costs, interim shelter assistance, move-in costs, landlord incentives, etc.

Grantees will be asked to provide updates on spending for administrative costs, direct program service costs, and direct financial assistance during required program updates. If grantees are not maximizing direct financial assistance or minimizing administrative costs, grantees will be asked to provide an explanation within their program update template, including plans to increase spending on direct financial assistance. CDSS will offer additional technical assistance to the grantee to help achieve best or promising practices in these areas.

II. FLEXIBLE CONTRACTING AND ADMINISTRATIVE EFFICIENCIES

Given that multiple rounds of funding may occur within a fiscal year or the grant period, CDSS strongly encourages grantees to make contracts and Memorandums of Understanding (MOUs) with implementing partners as flexible and easy to amend as possible. Contracts and MOUs may need to be altered to update award amounts, spending timeframes, and eligible activities (such as incorporating prevention services). Prioritizing flexibility will facilitate continued program operations while awaiting staggered funding, especially when transitioning to a new fiscal year and awaiting the finalization of the statewide program budget.

Grantees are strongly encouraged to consider strategic contracting with community partners, such as contracting with one implementing partner to deliver housing navigation across several programs with similar housing navigation needs. For example, grantees may utilize a portion of their BFH allocation in coordination with a

portion of their CalWORKs Housing Support Program (HSP), Project Roomkey, Home Safe, Housing Navigators (funded through HCD), or other local, state, or federally funded program awards to provide housing navigation for multiple programs across the community.

Similarly, grantees should strongly consider developing a flexible housing subsidy pool, in which dedicated funds from various housing programs are centralized for planning purposes into a single source to meet a common administrative purpose amongst the programs. On a client services level, costs would be attributable to the specific client and program of which they are a participant and would be claimed accordingly. Flexible subsidy pools allow for greater economies of scale while reducing cross-program competition for housing within a community.

For more information on flexible housing subsidy pools, reference:

- Flexible Subsidy Housing Pools Fundamentals – U.S. Department of Housing and Urban Development
- History and Takeaways from Los Angeles County's Flexible Housing Subsidy Pools – The Hilton Foundation

III. CLAIMING AND MATCH INSTRUCTIONS

Allowable expenditures, as described in this ACWDL, should continue to be claimed through the County Expense Claim Reporting Information System to Program Code 0496 (BFH). Expenditures exceeding the GF allocation will be shifted to county-only funding via State Use Only (SUO) Code 0484 (SUO – BFH). For additional claiming instructions, grantees should review County Fiscal Letter (CFL) No. 17/18-79 and CFL No. 18/19-25.

Note: Claiming instructions and match guidelines will be updated under separate cover to accommodate both the newer noncompetitive funding (which has no match requirement) and the BFH funding that remains available from CFL 19/20-67 (which maintains its match requirement).

ATTACHMENT FIVE: FISCAL YEAR 2021-22 NONCOMPETITIVE ALLOCATION AMOUNTS

The below table contains the noncompetitive allocation amounts for all 58 counties and one continuing tribe. The table includes "Humboldt County & Yurok Tribe" as a regional partnership. More information on the allocation methodology is contained in the "Fiscal Year (FY) 2021-22 Budget Updates" section of the main letter of this ACWDL. To accept the allocations, grantees must sign and return the Director's Certification in Attachment Six by **March 25th, 2022**. The funding process for Tribal Governments interested in establishing a new BFH will be provided under separate cover.

County	FY 2021-22 Noncompetitive Allocation
Alameda	$ 2,663,334
Alpine	$ 250,000
Amador	$ 250,000
Butte	$ 494,725
Calaveras	$ 250,000
Colusa	$ 250,000
Contra Costa	$ 1,079,500
Del Norte	$ 250,000
El Dorado	$ 279,991
Fresno	$ 1,810,337
Glenn	$ 250,000
Humboldt & Yurok Tribe	$ 1,521,931
Imperial	$ 497,484
Inyo	$ 250,000
Kern	$ 1,103,151
Kings	$ 405,681
Lake	$ 250,000
Lassen	$ 250,000
Los Angeles	$ 30,060,753
Madera	$ 311,882
Marin	$ 337,110
Mariposa	$ 250,000
Mendocino	$ 308,514
Merced	$ 385,260
Modoc	$ 250,000
Mono	$ 250,000
Monterey	$ 806,961
Napa	$ 250,000
Nevada	$ 250,000
Orange	$ 3,609,346

County	FY 2021-22 Noncompetitive Allocation
Placer	$ 425,000
Plumas	$ 250,000
Riverside	$ 2,583,139
Sacramento	$ 2,508,763
San Benito	$ 250,000
San Bernardino	$ 2,940,892
San Diego	$ 3,558,608
San Francisco	$ 4,015,877
San Joaquin	$ 1,091,204
San Luis Obispo	$ 1,587,971
San Mateo	$ 634,714
Santa Barbara	$ 742,442
Santa Clara	$ 3,526,143
Santa Cruz	$ 1,566,553
Shasta	$ 556,152
Sierra	$ 250,000
Siskiyou	$ 250,000
Solano	$ 524,719
Sonoma	$ 1,609,275
Stanislaus	$ 1,000,173
Sutter	$ 339,645
Tehama	$ 250,000
Trinity	$ 250,000
Tulare	$ 757,918
Tuolumne	$ 250,000
Ventura	$ 915,487
Yolo	$ 364,365
Yuba	$ 700,000
TOTAL	**$ 82,875,000**

ATTACHMENT SIX: DIRECTOR'S CERTIFICATION, INSTRUCTIONS AND FUNDING CONDITIONS

County Welfare Directors and Tribal Administrators wishing to accept the funds made available to their county and/or tribe as listed in Attachment Five shall complete and return this Director's Certification to housing@dss.ca.gov by **March 25th, 2002**. Counties and tribes interested in establishing new regional programs should refer to Attachment Seven for additional information.

Grantees accepting all or a portion of funds made available to their county/tribe as listed in Attachment Five shall complete Section One through Three below. Grantees declining all funding for FY 2021-22, shall complete Section One and Four below.

By accepting these funds and signing the certification below, the County Welfare Director and/or Tribal Administrator agrees to the funding terms and conditions outlined within this letter.

I. SECTION ONE: CONTACT INFORMATION

a) Name of County/Tribe: _____

b) Name of Contact Person and Title:

_____

c) Contact Information (Phone and Email):

_____

II. SECTION TWO: FUNDING AMOUNT AND PROGRAM TARGETS

NONCOMPETITIVE ALLOCATION: A county/tribe may accept the full amount identified within Attachment Five or a portion of these funds. For continuing grantees, **Attachment Five allocations are NOT inclusive of continued funding from CFL 19/20-67.**

Complete the information below to confirm acknowledgment of Attachment Five allocation amounts and select one of the following acceptance options

The Grantee hereby acknowledges the total noncompetitive allocation in Attachment Five is $_____.

The Grantee hereby:

☐ Accepts the **total** allocation amount as listed in Attachment Five

☐ Accepts the total allocation amount as listed in Attachment Five **AND** accepts additional funds, if available, beyond current allocation level **with no limit**

☐ Accepts the total allocation amount as listed in Attachment Five **AND** accepts additional funds, if available, beyond current allocation level **up to a limit**

- Specify the total FY 2021-22 allocation the grantee is able to accept: $_____

☐ Accepts **only a portion** of the allocation amount as listed in Attachment Five.

- Specify the total FY 2021-22 allocation the grantee is able to accept: $_____

Expected Clients to Serve: Grantees should assess community need, program capacity, and available resources to estimate the total unduplicated number of new and continuing BFH participants expected to be served between July 1, 2021 and June 30, 2024, with the funds accepted through the noncompetitive allocation above. Grantees should estimate the expected number of clients served to the best of their ability. However, these projections are for the purposes of initial program scoping and CDSS expects that grantees will refine these numbers at a later date.

Complete all the following:

i. Estimated number of families **experiencing homelessness** to receive permanent housing through BFH: _____
ii. Estimated number of families **at risk of homelessness** to receive BFH homelessness prevention services: _____
iii. Estimated **TOTAL** number of families to serve in BFH (i+ii): _____

III. SECTION THREE: COLLABORATION AND DIRECTOR'S CERTIFICATION OF FUNDING TERMS

Collaboration: BFH grantees must inform the local housing, homelessness, health, and social service networks of the following information:

- Total allocation available to the Grantee
- Total allocation accepted by the Grantee
- BFH program benefits and eligibility (e.g., Attachment One and Two)
- BFH program requirements as it relates to collaboration with the CoC, CES, and HMIS (e.g., Attachment Two)

Examples of partner outreach and communications include but are not limited to sharing the information with partners via an email, sharing at advisory or collaborative meetings, and providing roadshows or presentations to partners.

Relevant agencies and organizations may include the Continuum of Care (CoC), Public Housing Authorities (PHA), housing agencies of incorporated cities, family resource centers, family courts, behavioral health systems, educational systems, domestic violence agencies, juvenile dependency courts, legal aid organizations, and other relevant networks or partners critical to local outreach and collaboration.

☐ **A copy of the letter(s) sent to relevant partner agencies within the community and list of recipients is attached**. The county or tribe understands that this is a requirement to accept the noncompetitive allocation.

CONDITIONS OF FUNDING

I, County Welfare Director and/or Tribal Agency Director of [insert name of county and/or tribe], certify that I will:

1) Operate a BFH consistent with relevant laws, regulations, program guidance, and evidence-based practices, including but not limited to:
    a) Welfare and Institutions Code (WIC) Sections 16523 and 16523.1;
    b) All County Letters or similar instruction, including this ACWDL and ACWDL dated September 5, 2019;
    c) Housing First requirements as enumerated in WIC Section 8255 and further outlined in ACL 19-114;
    d) Evidence-based and promising practices in homeless assistance and homeless prevention.
2) Actively collaborate with local, state, and federal housing, homelessness and health and social service systems in order to make best use of available funding and link clients to necessary services. I understand that information on these collaborations will be requested within program updates. These collaborating entities may include but are not limited to:
    a) Child welfare service systems
    b) Continuums of Care and Coordinated Entry Systems
    c) Behavioral health systems
    d) Medical institutions and emergency response systems
    e) Housing authorities
    f) Public benefit agencies
    g) Legal aid and benefit advocacy providers
    h) Family resource centers
3) Collect, track, report and measure relevant program outcomes and engage in continuous data quality improvement, such as:
    a) Enter clients into HMIS.
    b) Submit BFH related program reports, including but not limited to the BFH 17, as specified by CDSS through an ACL or similar instruction.
    c) Participate in formal evaluation efforts which may include executing data sharing agreements with the HMIS administrator.
    d) Set program targets and milestones and report to CDSS on progress at least annually or upon request from CDSS.
4) Engage in training, technical assistance, and continuous quality improvement, including but not limited to:
    a) Program leads attend meetings and trainings required by CDSS.
    b) Respond to requests for program amendments in order to comply consistently with applicable laws and guidance, as determined by CDSS.

   c) Actively engage with technical assistance providers, including those contracted by CDSS, to support program growth, expansion, and improvement by attending meetings and trainings and contributing to technical assistance efforts, such as process mapping, program design, and case conferencing exercises.

5) Respond to requests for program progress reports, updates, expenditure information, including amount spent on prevention services, administrative costs, direct services and financial assistance, or program assessments as requested by CDSS, including but not limited to:
   a) For new grantees, implementation updates related to program ramp up at least every six months and then annually, after program implementation and until awarded amount is fully spent.
   b) For existing grantees, annual implementation updates in accordance with a schedule as determined by CDSS.
   c) For new and existing grantees, submit more frequent program updates if determined necessary by CDSS due to program performance.
6) Maximize spending on direct financial assistance and minimize administrative costs in order to ensure that all BFH participants are provided housing assistance and benefits advocacy.
7) Utilize Emergency Rental Assistance Program/California COVID-19 Rent Relief before BFH to pay for rental backpay, when applicable.
8) Notify CDSS in writing at least 30 days in advance of any temporary or permanent interruption or end to BFH services and operations for any reason, including fully spending the given allocation.
9) The CDSS reserves the right to reallocate BFH funds should a grantee be out of compliance with applicable laws or guidance issued by CDSS, and if CDSS determines it is appropriate or necessary to maximize program impact throughout the state.

I _____ certify that _____ will administer the BFH pursuant to the terms outlined above and understand this is a condition of receiving BFH funds. The information completed within the form and attached are true and correct.

_____ _____

County Welfare Director Signature/ Tribal Administrator Signature

Date

IV. SECTION FOUR: DECLINING FUNDS

DECLINING FUNDS – Only complete if the county or tribe DOES NOT wish to accept the Noncompetitive Allocation outlined in Attachment Five.

Counties and tribes that do not wish to accept the noncompetitive allocation outlined in Attachment Five are asked to notify CDSS by completing and signing the section immediately below and returning it to housing@dss.ca.gov as soon as possible but no later than **March 25th,2022.** The CDSS will consider the funds declined if no response is provided to CDSS by the county or tribe by **March 25th,2022.** *Note: counties and tribes accepting funds should not complete this section.*

To decline the funds, check the box below and complete the name and signature of the County Welfare Director/Tribal Administrator.

☐ Decline the entire amount of BFH Noncompetitive Allocation available to county/tribe.

_____ _____

County Welfare Director Signature/ Tribal Administrator Signature

Date

ATTACHMENT SEVEN: INFORMATION ON ESTABLISHING REGIONAL PROGRAMS

Grantees have the option to establish a regional BFH program. Counties and tribes in rural communities, communities with a regional Continuum of Care, grantees with regional Homeless Housing, Assistance and Prevention awards, or neighboring tribal communities may benefit from a regional BFH. CDSS especially encourages partnerships between counties and tribes, or neighboring tribal grantees.

Regional programs rely on a shared administrative structure or program functions which can create more staffing and resource efficiency in communities with smaller caseloads that may not warrant a full-time program case manager, or in areas where hiring is challenging.

I. REGIONAL FUNDING AVAILABILITY

The amount available for regional programs is equal to the sum of the allocation of each participating county or tribe (as specified in Attachment Five). In addition to the noncompetitive allocations, CDSS will provide an additional $150,000, to the extent it is available, to support and encourage regional programming.

II. REGIONAL PROGRAM AGREEMENT, ACCEPTANCE OF FUNDS AND REGIONAL DIRECTOR'S CERTIFICATION

Groups of counties and/or tribes interested in forming a **regional** BFH should contact CDSS at housing@dss.ca.gov as soon as possible. CDSS will set up an initial conversation to discuss and work through potential program design models and ensure that the participating counties/tribes are in agreement with the requirements of BFH and the regional partnership. Once an agreement has been made, CDSS will provide the participating counties and/or tribes a Regional Director's Certification, in which participating counties and tribes can certify acknowledgement of program funding terms and requirements. Regional Director's Certifications, signed by all participating counties and tribes, **must be submitted by March 25th, 2022.**

III. CONSIDERATIONS

When discussing a potential regional structure, counties and tribes should consider the following questions:

- What is the combined estimate of BFH-eligible families in these communities? How many will require preventative services and homelessness assistance?
- Will the regional BFH have a lead grantee?
- What functions, services and assistance will be centralized across the program? Which functions, if any, will remain within each grantee? (e.g.: programs have one housing navigator but retain independent outreach mechanisms)

- How will regional programs ensure that participants from each community have equal access to BFH services?
- What methods of communication will be established to ensure that coordination across grantees is streamlined, and that no participants fall through the cracks?
- How can a regional program leverage collaborative partnerships for critical services provided by other county departments or community-based providers, especially for roles with specific professional expertise? Examples include health care, behavioral health care or disability benefits advocacy, or legal representation for disability appeals.

IV. POSTPONED REGIONAL PROGRAM FORMATION

If counties and tribes are unable to come to agreement prior to the deadline to accept the noncompetitive allocation but still wish to establish a BFH (with a possibility of a future regional program) they must submit the Director's Certification (Attachment Six) no later than **March 25th, 2022.** If a regional structure is desired later after the Director's Certification deadline, CDSS will work with counties and tribes to explore possible options. However, if the county or tribe does not submit the Director's Certification by **March 25th, 2022** to accept the noncompetitive allocation, CDSS cannot guarantee funding will be available during FY 2021-22.