AT HOME

A COMPREHENSIVE PLAN TO ADDRESS HOMELESSNESS

Homelessness is THE humanitarian crisis of our time. Despite significant investments by the state and local governments, California lacks a comprehensive plan to address it effectively and equitably. The current approach to helping those who are unhoused is fragmented and lacks clear lines of responsibility, accountability and sustainability. This must change.

To make meaningful progress in helping those who are unhoused, the California State Association of Counties (CSAC) offers the 'AT HOME' Plan. Counties are determined to work with our federal, state and local partners, and in partnership with the Governor and the Legislature, to implement this comprehensive plan to help those who are unhoused or at risk of becoming unhoused in our communities.

A CCOUNTABILITY

Clear responsibilities aligned to authority, resources, and flexibility for all levels of government

No one level of government is solely responsible for the homelessness crisis. We need to develop a comprehensive and coordinated plan that includes all levels of government. The undertow of massive economic and systemic inequities, as well as a tangled web of decisions made by well-intentioned policies and programs built over decades, continues to stymie efforts to support those who are unhoused or at risk of becoming unhoused.

- Clearly define city and county roles for siting and supporting shelters, siting permanent supportive housing, encampment outreach, and encampment clean-up.
- Commit ongoing funding – one-time funding is neither sustainable nor conducive to maintaining programs.
- Work with the state and cities from start to finish, require the submission of countywide or regional plans with established, clear goals and responsibilities.
- Allocate funding commensurate with the responsibilities each entity has within the plan and provide for maximum local flexibility to be used in accordance with established goals and outcomes.

T RANSPARENCY

Integrate and expand data to improve program effectiveness

Current data systems and data sharing do not support an integrated case management approach to helping those who are unhoused or at risk of becoming unhoused.

- Integrate and expand data systems to enhance transparency and allow for data-driven decision making.
- Enhance existing health, social services and state and local criminal justice data systems to provide more robust data on the immediate and long-term needs of individuals and better manage institutional discharges.

H OUSING

Increase and maintain housing units across the spectrum

There is a significant shortage of housing in California, especially affordable housing to support aged, disabled and very low-income residents.

- Increase resources needed to acquire, build and operate housing solutions across the full housing continuum, especially permanent supportive housing for individuals with complex needs.
- Increase flexibility and streamlining to generate more affordable housing projects.
- Create flexible housing subsidies and modify federal Housing Choice Vouchers to help more individuals utilize rental assistance to maintain housing.

OUTREACH

Develop sustainable outreach systems and increase workforce to support these systems

There is a significant shortage of Health and Human Services (HHS) workers to manage the programs and services that assist with addressing homelessness in California. In addition to identifying ways to support and build this workforce, new classifications that leverage lived experience and support housing navigation are also needed. To further strengthen and stabilize this system, federal funding should be obtained for many of these critical activities.

- Recruit, train and retain a robust HHS workforce and consider new certifications for workers in housing and other fields.
- Leverage additional federal funding for outreach and rapid response.
- Expand training and quality improvement incentives for law enforcement and probation responding to unhoused individuals.

MITIGATION

Strengthen safety net programs

Counties run or administer most health and human services programs on behalf of the state. These programs serve as the safety net in California, and we must strengthen these programs to prevent individuals from becoming homeless.

- Provide adequate funding for county administration of safety net programs to ensure eligible individuals can be enrolled and receive the services they need timely.
- Increase the availability of and access to programs and services that provide screening, treatment, and recovery services for substance use disorder.
- Increase flexibility for county behavioral health funding to maximize federal Medi-Cal funds and expand the reach of county behavioral health investments for the unsheltered population.

ECONOMIC OPPORTUNITY

Create employment and education pathways, as well as supports for basic needs

Specialized education and career programs and services are needed to support the economic opportunity and long-term self-sufficiency of those who are formerly homeless or at risk of experiencing homelessness, including justice-involved individuals, veterans, older Californians, and former foster youth.

- Update local workforce development and investment boards to address employment for unhoused populations and work with California Community Colleges to develop programs that support the formerly unhoused.
- Increase accessible programs for justice-involved individuals to receive training and overcome employment barriers.
- Continue and expand efforts to assist more qualifying aged, blind, and disabled persons to obtain SSI/SSP benefits and expand subsidized housing placements for these populations.

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ACCOUNTABILITY

Clear responsibilities aligned to authority, resources, and flexibility for all levels of government

Counties and cities across California are leading and collaborating to provide solutions to homelessness. Many counties and cities have already forged countywide plans that bring together cities, tribal governments, continuums of care, housing authorities, managed care plans, and community based organizations. To effectively address homelessness statewide and increase accountability, partnerships and plans are necessary. This will involve cities and counties coming together with clearly defined roles, responsibilities, and actions needed to address homelessness.

The state can support local governments by aligning fiscal incentives in a way that supports defined responsibilities and collaboration. The Homeless Housing, Assistance and Prevention (HHAP) grants have been an important flexible funding source to support local efforts to address homelessness and recent distributions have encouraged the submission of joint plans for overlapping jurisdictions. More state actions that further local coordination are warranted.

In order to build a comprehensive and accountable system, not only must there be plans with clearly defined roles, responsibilities, and actions, but there also must be ongoing funding from the state. Local governments have made significant investments to address homelessness. However, counties and cities are not able to make long-term commitments to a comprehensive system of care with one-time state funding and will not be able to maintain the level of services temporarily supported by the federal COVID-19 related funding and HHAP funding. Sustained state funding, paired with local flexibility and technical assistance, is necessary to achieve continued and sustained progress on homelessness and to meet measurable goals aligned to investments and authority.

Current state and federal funding streams that support homelessness efforts are fraught with complexity and support a patchwork of programs administered by different governmental entities. This has often resulted in actions by different entities that are not aligned and accountable to measurable goals. The current funding structure has led to fractured decision making and administrative convolution that hinder progress in addressing homelessness.

TO IMPROVE ACCOUNTABILITY, THE FOLLOWING ACTIONS ARE RECOMMENDED:

- Consolidate HHAP grant and reporting countywide or within a multi-county region to support a countywide or regional plan with one fiscal agent. In some instances, such as large counties with big cities, a countywide plan with multiple fiscal agents may be accommodated. Allocations through the fiscal agent will be determined by the agreed upon plan and commensurate with the level of roles and responsibilities that each county and city has within the plan. Continuums of care would also be allocated funding through the fiscal agent consistent with assigned responsibilities under the countywide plan. It is critical that these plans are built and approved by counties and cities that are ultimately responsible and accountable to constituents for the implementation of the plan and have unique authority to site required infrastructure.

- Provide HHAP funding ongoing to support one countywide or regional plan to address homelessness.
- As a condition of receiving HHAP funding, counties and cities must agree to a defined set of roles and responsibilities related to homelessness that shall minimally include, unless otherwise determined:
  - Counties have the responsibility for health and social safety net programs on behalf of the state and administer these services in a manner that reaches individuals at risk of or experiencing homelessness.
  - Counties have the responsibility to provide specialty mental health and substance use disorder services to low-income persons and administer these services in a manner that reaches individuals at risk of or experiencing homelessness.
  - Cities shall be responsible for siting, funding, and supporting shelters for the unsheltered population within their jurisdiction. Counties shall be responsible for siting, funding, and supporting shelters for the unsheltered population within the unincorporated areas of the county. Shelter beds needed shall be determined by the concentration of homelessness in each incorporated and unincorporated jurisdiction.
  - Cities shall be responsible for siting permanent supportive housing within their jurisdiction. Counties shall be responsible for siting permanent supportive housing within the unincorporated areas of the county.
  - Cities shall be responsible for clean-up and sanitation of encampments within their jurisdiction. Counties shall be responsible for clean-up and sanitation of encampments in unincorporated areas of the county. These responsibilities are done with an understanding of state and federal responsibility for clean-up and sanitation of encampments on state-owned properties and federal lands, respectively.
  - Clearly define responsibilities for cities and counties related to encampment outreach.
- Funded entities must submit a local homelessness action plan that includes clear outcome goals on a range of metrics, including how the plan addresses equity. Funded entities can be held accountable to these goals only to the extent that the state provides sufficient funding for the reasonable costs of the interventions identified to achieve those goals.
- Maximize local flexibility for uses of this funding in order that funded entities have the ability to best utilize this funding at the local level to achieve the goals of the homelessness action plan. Improve flexibility and understanding of diverse local conditions in designing requirements for local plans.
- Provide enhanced technical assistance, especially to those jurisdictions with limited resources, staffing, and community partners.
- Provide performance-based funding for countywide plans that meet metrics in reducing homelessness. Funded entities should be rewarded for aggressive goals and achieving success.
- Establish a minimum county amount to ensure that smaller counties can sufficiently support staffing and programs. Relying on Point-in-Time (PIT) counts solely for allocations can negatively impact counties with severe winter weather. Minimum allocations are a consistent feature of many health and human services programs.
- Consider consolidating or redesigning other related programs and funding streams that support homelessness efforts, such as rental assistance and encampment resolution, to further simplify and streamline funding.

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TRANSPARENCY

Integrate and expand data to improve program effectiveness

An accountable system to address homelessness requires transparency. Current data systems and data sharing are fragmented and do not support case management-type approaches for addressing homelessness. Improved data systems are important to improve effectiveness of countywide systems. Some counties have used temporary federal and state funds to support new data systems to better serve the unhoused population.

In addition, there is currently considerable inefficiency in delivering services to homeless individuals who are in and out of institutional settings. One new opportunity for improvement is the Data Exchange Framework (DxF) under the California Health and Human Service Agency, which requires certain health care entities, and encourages county health, public health, and social services, to participate in better data sharing across health and human services to serve the needs of the whole person.

Without meaningful data systems it will be challenging for the state and local governments to demonstrate transparency about progress and improve outcomes, especially given the myriad of entities that support local efforts to reduce homelessness.

TO IMPROVE TRANSPARENCY, THE FOLLOWING ACTIONS ARE RECOMMENDED:

- Provide funding and technical assistance to support more robust data systems with case management and secure data sharing capabilities, including the infrastructure needed to integrate to the DxF.
- Standardize data collection and planning around institutional discharge.
- Pursue enhancements to existing health, social services, and state and local criminal justice data systems to provide more robust data on the immediate and long-term housing needs of individuals.
- Increase the number of users with Homeless Data Integration System (HDIS) access in each local jurisdiction and support expanded users county-wide that can input into local Homeless Management Information Systems (HMIS).

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HOUSING

Increase and maintain housing units across the spectrum

There is a significant housing shortage across the full housing continuum in California and the supply of permanent, affordable housing continues to be a considerable challenge to addressing homelessness. This is especially true for affordable housing to support Californians who are aged, disabled, justice involved, and/or have significant mental health or substance use disorder needs. Many jurisdictions also lack the infrastructure needed to provide basic shelter or interim housing to the unhoused population. In response to the COVID-19 pandemic, significant temporary federal and state funds were invested to increase capacity and provide housing and income protections to very low-income Californians, but many of those sources have expired or are expiring.

Siting shelters and supportive housing often draws significant resistance from community members, and counties and cities must continue to work to remove these barriers and identify and support the development of infrastructure needed to address homelessness. However, local governments do not have the tools and funding needed to develop these units to scale. Low-income housing projects are most often financed with a combination of tax-exempt bonds, federal and state tax credits, as well as other local funding sources. The state and federal sources of funding are significantly oversubscribed, which is limiting the number of projects that can go forward, especially in areas of the state that do not have large contributions from philanthropy for this purpose. Local governments have all too often seen projects stalled when local communities object to new housing, particularly for the most vulnerable populations.

TO ACCELERATE THE DEVELOPMENT OF HOUSING AND SHELTERS NEEDED TO ADDRESS HOMELESSNESS AND HELP INDIVIDUALS MAINTAIN THEIR HOUSING, THE FOLLOWING ACTIONS ARE RECOMMENDED:

- Advocate for more federal and state support to build and maintain housing for low-income Californians and develop creative financing models to increase the feasibility of more projects.
- Increase the development and operational support of permanent supportive housing and other housing tailored to support individuals with complex/high needs, including individuals with behavioral health needs, or justice involvement, including recovery residences.
- Create and fund flexible housing subsidies to supplement existing rental assistance efforts that could be targeted toward specific populations, such as older adults, individuals with disabilities, and individuals with behavioral health conditions.
- Increase the value, portability, and number of federal Housing Choice Vouchers. This could also include flexibility to serve individuals with unique challenges including behavioral health conditions. This could be achieved through a California or multi-state demonstration project or other action by the federal Department of Housing and Urban Development (HUD) or Congress.
- Provide separate and sufficient funding for housing for CARE Act participants.

- Provide alternate funding mechanisms to reduce local development and construction fees, such as the state's Infill Infrastructure Grant Program.
- Address significant barriers of well-intentioned tools and processes being used to block projects or create local challenges to growth.
- Categorically exempt all permanent supportive housing, shelters, and transitional housing that meet specified criteria from CEQA review.
- Combine and streamline the variety of existing state housing programs to focus these resources on creating permanent affordable housing. For example, the Department of Housing and Community Development has approximately 20 active state housing-related grant programs in 12 categories. Consolidating existing programs and adjusting statutory eligibility requirements can help focus these streams of funding to address the most critical aspects needed to construct permanent housing to address and prevent homelessness.
- Streamline a variety of existing development and construction-related statutes and codes to reduce the complexity of planning, permitting, and constructing affordable housing. This should focus on ensuring statutory requirements in Government, Public Resources, Health and Safety Codes as well as the Building Standards Code regulations work coherently to incentivize and streamline the delivery of affordable, equitable and safe housing.
- Pursue policies that allow additional temporary safe parking, gathering sites, and other non-traditional, innovative housing options.
- Remove additional state requirements for non-entitlement jurisdictions for HOME Investments Partnerships Program (HOME) and the Community Development Block Grant (CDBG) program funding.
- Advocate for flexibility in county social safety net programs to support housing stability and prevent homelessness.
- Advocate for several policy changes at the federal level:
  - Restore the 12.5 percent federal Low-Income Housing Tax Credits that expired at the end of 2021.
  - Lower the 50 percent test to 25 percent to decrease the amount of private activity bonds needed to access the housing tax credit.
  - Increase the statutory cap of Project-Based Vouchers (PBVs) from 20 percent to 50 percent.
  - Replace Fair Market Rental formulas with reasonable rate rental formulas.

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OUTREACH

Develop sustainable outreach systems and increase workforce to support these systems

Addressing homeless encampments shifted considerably after the *Martin v. City of Boise* decision and during the COVID-19 pandemic with public health guidance issued by both the federal and state governments. Working to connect individuals living in homeless encampments with services and housing requires considerable efforts by counties, cities, and other partners. However, outreach and casework around encampments are not covered activities under any of the state and federal entitlement programs, including Medi-Cal. Many successful local efforts have been implemented using one-time state and federal funding to coordinate the outreach and casework needed to transition persons living in encampments into housing, and continuing those efforts is critical.

County governments and other levels of government are currently facing the most difficult labor market in decades. There are significant and well documented challenges to recruiting, training, and retaining qualified staff especially in behavioral health and social worker classifications. These types of workers, as well as leveraging lived experience and creating new trained classifications, are necessary to expand the service and provider network sufficiently to support comprehensive homelessness services, especially to support housing navigation.

THE FOLLOWING ARE RECOMMENDED ACTIONS TO IMPROVE OUTREACH AND RESOLUTION TO HOMELESS ENCAMPMENTS:

- Develop statewide street outreach through a new pre-approved Medi-Cal Administrative Activities Plan and structure to maximize federal reimbursement for these activities, as well as pursue other avenues for federal funding for outreach, rapid response, follow up, and individual retention activities.
- Expand training incentives for law enforcement and probation related to responding to individuals experiencing homelessness.
- Identify the specific skills that are needed for a homeless response system workforce and develop training, coaching, and support programs. This includes leveraging lived experience and developing skills that are needed to help individuals navigate the housing landscape.
- Consider creation of certification for workers in the housing field and homelessness navigator field. Professionalizing work on housing and homelessness would help highlight the specialized knowledge required to be effective practitioners helping individuals with housing issues. This could be achieved through a state, community college, local government, and health plan partnership.
- Support the integration of the new community health worker benefit through the managed care plans with the homelessness outreach system and county behavioral health.
- Provide support for regional hubs for training and workforce resources statewide.

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MITIGATION

Strengthen safety net programs

Counties run or administer eligibility for most health and human services programs on behalf of the state and federal governments. The major programs include CalWORKs, Medi-Cal, mental health and substance use disorder services, In-Home Supportive Services, Child Welfare Services, Adult Protective Services, and CalFresh. Counties also are responsible for administering a General Assistance program for indigent individuals who are not eligible for the state CalWORKs program. Successful implementation of these core health and social services programs are the front lines of preventing homelessness. This is the safety net in California.

State supports and initiatives are essential for effective health and human services programs. However, funding is often prescriptive and not aligned to the cost of service delivery through a skilled and trained workforce or reflective of actual county costs. Furthermore, the infrastructure grants and other state grant opportunities are often complex and challenging for counties to maximize, especially smaller counties. The state should make efforts to maximize federal resources through Medi-Cal that can be deployed to support serving individuals experiencing homelessness. The state should also consider streamlining reporting and providing additional flexibility when allocating funding to counties to allow for additional local efforts that will focus on preventing homelessness across the programs administered by the counties. Ensuring counties have sufficient resources to administer these key programs will help individuals maintain their health, self-sufficiency, and housing.

THE FOLLOWING ARE RECOMMENDED ACTIONS TO IMPROVE MITIGATION EFFORTS FOR INDIVIDUALS EXPERIENCING HOMELESSNESS AND TO PREVENT INDIVIDUALS FROM BECOMING HOMELESS:

- Increase flexibility for county behavioral health funding to maximize federal Medi-Cal funds and expand the reach of county behavioral health investments for the unsheltered population.
- Ensure adequate funding and resources for county administration of key safety net programs to ensure eligible individuals can be enrolled and receive the services they need timely.
- Pursue opportunities to obtain matching federal funds including Medi-Cal Administrative Activities and claiming for social services, health, and behavioral health activities to help stretch investments.
- Continue support and partnership on the California Behavioral Health Community-Based Continuum Demonstration federal waiver request (Institutions for Mental Disease or IMD) to increase reimbursement for short-term inpatient costs.
- Leverage funding and coordination opportunities with the recent approval of the federal Medicaid 1115 demonstration waiver that will establish a coordinated community reentry process and provide for a targeted set of Medi-Cal services to youth and adults in state prisons, county jails, and youth correctional facilities for up to 90 days prior to release.

- Provide state funding for county conservatorship activities, which are currently underfunded. There is a growing demand for these services and resources must also be provided for any expanded duties or increased populations served.
- Increase opportunities for counties to participate in California Advancing and Innovating Medi-Cal (CalAIM) for homelessness supports.
- Seek federal approval to make housing support services a guaranteed Medi-Cal benefit that managed care plans must offer within CalAIM.
- Increase the payment levels for individuals with a mental health condition residing in board and care facilities and other applicable facilities.
- Increase state funding to expand availability of and access to programs and residential treatment that provide recovery services for substance use disorder.

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ECONOMIC OPPORTUNITY

Create employment and education pathways, as well as supports for basic needs

To address homelessness over the long-term, there must be a goal and focus on employment, self-sufficiency, and the ability to cover basic needs for formerly homeless individuals. Specialized education and career supports are needed for formerly homeless, including justice-involved individuals, veterans, and former foster youth, to help support economic stability and opportunity.

Counties need additional support to build these programs. These efforts should be in collaboration with the key entities that provide services to and employ individuals. Finally, programs must recognize the unique challenges individuals face and provide supports for their needs and help them maintain employment.

TO DEVELOP AND SCALE THESE PROGRAMS, THE FOLLOWING RECOMMENDATIONS SHOULD BE CONSIDERED:

- Require local workforce development/investment boards to update plans to address this population in coordination with counties and cities.
- Work with California Community Colleges to develop programs that support those who are currently or formerly unsheltered.
- Support accessible programs for formerly homeless justice-involved individuals to receive training and overcome employment barriers.
- Provide resources for supported education and employment model programs.
- Encourage investment in statewide peer support services and certification to employ individuals who are formerly homeless to assist in outreach, recovery, treatment, and case management.
- Support efforts that strive to create economic opportunities for all populations, including urban, suburban, rural, and disadvantaged communities.
- Continue and expand efforts to assist more qualifying aged, blind, and disabled persons obtain SSI/SSP benefits and expand subsidized housing placements for these populations.

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