



Housing First 201: Practical Implications and Applications

Contra Costa County Continuum of Care

May 24, 2021

Link to Video of Training:

https://drive.google.com/file/d/13m1GtOvp6Hx-OFF3JVT0aT_ydGY3mTQD/view?usp=sharing

Today's Agenda



Core Principles & Key Characteristics of Housing First Programs



Common Housing First Challenges



Implementing Housing First

Challenges & Solutions
Individualized Approaches



Looking Forward

Why Housing First?

- **Evidence-based**
- **Funder/community priority**
- **Core Practice**
- **State law**
- **Helps people**

Housing First at the **System Level**

- **All programs** lower barriers
- Most **vulnerable prioritized**
- **Housing-focused** services and engagement begin **immediately**
- **Client-focused and voluntary**
- **Evidence-based** practices
- Client **choice and voice**
- As you serve higher acuity people, you may need to increase supportive services.

Housing First at the Program Level

- Participants are treated with **dignity and respect**
- Optimize **autonomy and independence**
- Participation is **voluntary and self-initiated**
- **Program entry not is contingent on:**
 - **Sobriety**
 - **Income**
 - **Clean criminal record**
 - **Clear eviction history**
- Staff **are trained on best practices**
- Commitment to **increasing supportive services**

Common Challenges

- Serving clients with SMI, behavioral health challenges and substance use
- Serving clients with low or no income
- Serving registered or convicted sex offenders
- Landlord reluctance
- Shelters

Serving Clients with SMI and Behavioral Health Challenges

- Common Challenge: Engage in behaviors that cause them to lose housing and access to programs.
- Reframing the Challenge: Make all service plans and other agreements **flexible** and based on the **needs of the individual**:
 - Certain times and certain clients require more
 - Ensure leases are uncoupled from service plans
 - Tenants have full rights via leases and access to legal assistance
 - Prevention support
 - Build trust with clients
 - You are not responsible for their recovery

Serving Clients with Low or No Income

- Common Challenge: Providers worry they will not be able to become financially independent.
- Reframing the Challenge: Understand **individual's history** and connect them to the **appropriate services**:
 - Connect with local housing authority regarding vouchers
 - Assess based on prospective income
 - Increase connections to cash and non-cash benefits
 - Shared housing
 - Increase support for housing stability at the system level

Serving Registered or Convicted Sex Offenders

- Common Challenge: Historically challenging population to house.
- Reframing the Challenge: Lower barriers by:
 - Work with clean slate programs and criminal justice partners
 - ID people at risk of homelessness
 - Clean slate work
 - Identify which providers can house sex offenders and under what conditions
 - Establish collaborative team for each client
 - Know participant's specific restrictions and conditions
 - Help clients reframe their stories

Landlords Fears About Housing First

- Common Challenge: Concerned that high-needs tenants may undermine ability to be a good tenant.
- Reframing the Challenge: Support relationship and let landlord know their efforts are supporting the community.
 - Understand and address anxieties by eliminating hassle and mitigating risk
 - Make someone available (other than 9-1-1) for landlord to contact in a crisis
 - Ask for more units
 - Check in regularly with landlord and participant
 - Seek feedback
 - Work with tenants

Shelters

- Common Challenge: Some individuals won't participate in housing search, case management, or other voluntary services
- Reframing the Challenge: Work with the participant to find their strengths and meet their unique needs.
 - You own the engagement, they own their lives
 - Work as a team – participants have both professional AND personal support networks; find creative connections to help them engage
 - Support the client in identifying clear, actionable steps that do not overwhelm
 - Set them up for success in housing - warm handoff to build trust, clear path to stability after housing

Instructions for breakout rooms



Discussion Leader

Assures that each person who wants to speak is heard in the time available



Recorder

Writes output using the speakers' words



Reporter

Delivers the group's report in the time allowed



Time Keeper

Keeps the group aware of time, monitors report-outs

Scenario #1

Challenge – Shared Housing: You run a Rapid Re-Housing program. One month ago you received a referral for Jamie, who has a history of severe behavioral issues and substance use. Since arriving, Jamie has refused to meet with their case manager or cooperate with the process. Based on behavior and appearance, it also appears that Jamie has relapsed and is using alcohol and methamphetamine on a regular basis. Many of the other participants are also in recovery and trying not to use drugs or alcohol, they have complained to you about how Jamie's appearance and behavior impacts them. This weekend Jamie had a meth-induced mental health crisis and burst into a common area where other participants were meeting and disrupted the meeting. What do you do? What if there are other roommates?

Scenario #2

Challenge – Serving Registered Sex Offenders: You are a Rapid Re-Housing provider and have just been forwarded Phil’s case from coordinated entry. During your background check you see an arrest for child pornography from several years ago and suspect that Phil is a registered sex offender. Your program generally cannot house registered sex offenders. What do you do?

Scenario #3

Challenge – Low or No Income: Paige and her two children are participants in your housing program. Paige is an eager and willing participant, but you know that based on her children's needs and her own employment history, Paige will never be able to afford rent in the area on her own. What do you do?

Scenario #4

Challenge – Emergency Shelters: A participant refuses to engage in housing search and placement, and refuses to engage in general. What do you do?

What if the participant *is* engaging in housing search and placement, but *does not* want to engage in case management or other services? What do you do?

Questions Following Report Out

Scenario #1 – Shared Housing:

- Have you contacted CE to figure out who referred this person and their contacts in the community?
- Do all your case managers have trauma informed care and harm reduction training? If not, do you know where they can go to get it?
- Have you made sure that you have sufficient staff to work with this person?
- Do you know who to contact for additional support related to behavior v. addiction/mental health issues?

Questions Following Report Out

Scenario #2 – Serving Registered Sex Offenders:

- Have you examined exact terms of that person's registration? What are they prohibited from?
- Can your program serve them?
- If the answer to the above is “No, we are a single-site program near a school with children,” what other resources in the community can serve this person?
- This person might need extra support because of conditions of their registration. Where can we find that?
- Where can staff go to receive training to figure out their terms, and next steps for serving this person?

Questions Following Report Out

Scenario #3 – Low or No Income:

- Have you made sure Paige is signed up on all voucher lists? And for all affordable housing opportunities?
- Have you made sure she is signed up for all available supportive services available in your community?
 - Identify who in the community provides which services
- Have you investigated whether she'd be interested in shared housing?
 - Process should be client-driven

Questions Following Report Out

Scenario #4 – Emergency Shelters:

- Does the participant know who they're supposed to be engaging with?
- Is there a clear housing plan?
- Is there a staff member/peer that they have better rapport with?
- Are staff approaching engagement with a harm-reduction/trauma-informed lens
- Are staff employing motivational interviewing skills when conversing with the participant? Are they displaying other best practice skills in case management?
 - Remember – it is alright to set deadlines. The person might have to leave shelter if they haven't engaged in specific steps. However they should be free to return at any time and engage at a later date!

Activity: Resolving Crises

Think

Think of a particularly challenging, tenancy-threatening situation you encountered & successfully resolved with a client.

Identify

Identify the communication strategies and resources/supports you used to work with the client through the situation and help them resolve the crises.

Brainstorm

Brainstorm what other strategies, resources, partners or support would have been helpful to resolve the issue.

Record

Record your answers.

Report

Report ideas for the future to the group.

Debrief Questions

- What local programs or resources did you identify that can help?
- What resources does your program or agency have that helps reframe challenges?
- What successful housing outcomes have you seen in your program and how have you done that?

Questions?

Contact us at:

contracostaTA@homebaseccc.org

HOUSING FIRST PROJECT CHECKLIST

For your homeless response system to work most efficiently and effectively, individual projects must embrace a Housing First approach. This checklist can help you assess the extent to which your projects are implementing Housing First. You can use this tool for trainings or planning sessions, during a site visit or program audit, as a guide when reviewing funding applications, or for many other uses.

- Access to the project is not contingent on sobriety, minimum income requirements, lack of a criminal record, completion of treatment, participation in services, or any other unnecessary condition not imposed by the terms of the funding itself.
- The project does everything possible not to reject an individual or family based on poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that are interpreted as indicating a lack of “housing readiness.”
- People with disabilities are offered clear opportunities to request reasonable accommodations within applications and screening processes and during tenancy, and building and apartment units include special physical features that accommodate disabilities.
- If that project cannot serve someone, it works through the coordinated entry process to ensure that those individuals or families have access to housing and services elsewhere.
- Housing and service goals and plans are highly tenant-driven.
- Supportive services emphasize engagement and problem-solving over therapeutic goals.
- Participation in services or compliance with service plans are not conditions of tenancy, but are reviewed with tenants and regularly offered as a resource to tenants.
- Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants’ lives. Tenants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.
- Substance use in and of itself, without other lease violations, is not considered a reason for eviction.
- Tenants in supportive housing are given reasonable flexibility in paying their share of rent on time and offered special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.
- Every effort is made to provide a tenant the opportunity to transfer from one housing situation, program, or project to another if tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

Housing First: Best Practices for Serving Domestic Violence Survivors

The Domestic Violence Housing First Model

The Domestic Violence Housing First model is an approach that focuses on, “helping survivors obtain and/or maintain safe and stable housing as quickly as possible through the use of flexible financial assistance, survivor-driven advocacy, and community engagement. This model aims to meet survivors’ individual and unique needs to attain housing stability and safety.”¹

Flexible Financial Assistance

Flexible assistance is a core component of the DV Housing First model because survivors often require assistance with a number of issues related to housing that may not fit into the requirements for direct subsidy programs. For example, move-in costs, utility assistance, debt assistance, food assistance, child-care, legal services, relocation services, and transportation costs. Having flexible funds available for survivors is crucial to assisting participants locate and remain stably and permanently housed.

Survivor-Driven Advocacy

In a survivor-driven advocacy model, the survivors guide the process and providers will meet survivors where they are at emotionally *and* physically (e.g. safest and most convenient location for survivors). Providers in this model focus on strengths as opposed to barriers and constantly promote safety and choice through a trauma-informed care lens.

Community Engagement

Providers should continually engage community members, resources, institutions and services that can support survivor safety and housing stability. This can help build up a support network for survivors and open doors to much need housing opportunities and services.

Key Skills for Homeless Service Providers Working with DV Survivors

¹ Evaluation of DV Housing First in California pg. iv.

To create a safe, low-barrier environment where decisions are driven by client choice for survivors experiencing homelessness or at risk of homelessness, homeless service providers should leverage case management tools and all available community resources. Developing relationships with a wide range of community partners is essential to creating safe environments and obtaining sustainable housing options to DV survivors. Tools and resources to build on when working with survivors include:

Case Management Tools	Community Knowledge/Resource-Based Tools
<p><u>Trauma-Informed Communication²</u></p> <ul style="list-style-type: none"> • Stay calm • Acknowledge feelings and validate • Do not make promises • Suspend your judgment • Identify the survivor's strengths and resources • Demystify the process • Give the survivor space to lead the conversation 	<p><u>Confidentiality</u></p> <ul style="list-style-type: none"> • When a survivor leaves is the most lethal time in the relationship • There are federal confidentiality statutes protecting survivor information in certain circumstances • These statutes protect survivors • Be mindful what details you share, where you share them, and who you share them with • Staff should be trained on best practices and legal obligations regarding confidentiality • Ask the survivor what is and is not safe to share. <ul style="list-style-type: none"> • Let them know what things you HAVE TO share
<p><u>Active Listening</u></p> <ul style="list-style-type: none"> • Pay attention <ul style="list-style-type: none"> • Eye contact • Ignore other things happening • Put your thoughts on hold • Show you are listening • Provide feedback on what was said • Do not interrupt <ul style="list-style-type: none"> • Embrace the silence 	<p><u>Legal Safety Planning</u></p> <ul style="list-style-type: none"> • Perpetrators may use the legal system as a means of on-going power and control • Understand that the legal system is often abusive • Communicate to the client that information is power

² Information in table is derived from work developed by La Mer Kyle-Griffiths Dir. of Training & Litigation from Still She Rises (Tulsa) and Chelsea Foreman, MSW Assistant Shelter Director Domestic Violence Intervention Service.

Empathetic Listening

- Perspective taking
- Staying out of judgment
- Recognizing emotion
- Communicating that emotion
- Being a good listener does not mean you have all the answers. It means you are a safe vessel for that person to connect with.

Connect Household with Resources

- Identify all legal, financial, and emotional support resources that can serve survivors in your community
- Often survivors will need to be connected to flexible financial assistance so make sure that staff are aware of any flex funds available in the community
- Offer trainings and resources to the homeless system of care so that other homeless service providers can begin to incorporate these best practices

Additional Resources

- [Evaluation of DV Housing First in California](#)
- [Executive Summary of Evaluation of DV Housing First in California](#)
- **Webinar Series:** [What Does it Take to Become a Domestic Violence Housing First Agency \(Washington State Coalition Against Domestic Violence\)](#)
- [Domestic Violence Housing First Checklist \(Washington State Coalition Against Domestic Violence\)](#)
- [Domestic Violence and Housing First Landlord Outreach and Education Toolkit Washington State Coalition Against Domestic Violence](#)
- [How Flexible Financial Assistance Can Assist Survivors \(Washington State Coalition Against Domestic Violence\)](#)

Strategies for Housing People on the Sex Offender Registry

California Penal Code 290 – also known as the “Sex Offender Registration Act” – requires people convicted of any one of over 100 crimes¹ to periodically register their whereabouts with local law enforcement. People who are unsheltered must register at least every 30 days or face severe penalties.

The California Department of Justice Megan’s Law website publicly posts the name, address, conviction history, and appearance of many registrants.² Additionally, people on the registry often have community supervision terms that restrict their access to the internet, certain locations, and certain jobs. These restrictions – and others – can make it difficult for registrants to find suitable housing.

Housing options for people on the registry are always limited. As California jails and prisons release individuals to prevent the spread of COVID-19, however, housing and homeless service providers need to increase their familiarity with strategies they can use to help people with registry requirements reenter society with housing.

What is the Continuum of Care’s Role?

Continuums of Care (CoCs) should work with criminal justice partners (such as jail and prison leadership, and parole or probation officers) to identify people required to register who are at risk of homelessness upon discharge.

Ideally, the CoC should assess people prior to release, and then coordinate discharge planning efforts with corrections and community supervision to ensure a smooth transition to housing that will help facilitate the individual’s ongoing safety and stability upon release. In the alternative, CoCs can assess individuals post-release and then make referrals to housing programs that coordinate with parole or probation.³ Some corrections programs even offer short-term housing assistance. However, in order to minimize gaps, providers should focus on longer-term housing that people on the registry can connect to after immediate, short-term housing options offered through community corrections programs end.

Provider Strategies

Build Your Client’s “Team.” No one will be able to express your client’s needs better than your client. Connecting with the following people to create a collaborative “team,” however, can help you further identify and meet your client’s housing needs:

Their parole or probation officer can

- Give you the facts about your client’s specific housing restrictions. Each individual has different terms of their release. Some are stricter than others. Do not make assumptions about where they can or cannot live without official confirmation.
- Inform you about any rehabilitation programs your client is enrolled in or has completed that could help them overcome housing barriers (e.g. certificates, letters of recommendation, etc.)

¹ These crimes range in severity and can include offenses such as “indecent exposure” and “prostitution.”

² https://www.meganslaw.ca.gov/SexOffenders_SummaryOfLaw.aspx

³ Remember that CoCs must take a housing first approach to working with all clients, and that the [CoC Interim Rule](#) (24 CFR § 578.93) states that CoC funded providers are only allowed to deny a referral on the basis of registered sex offender status under narrow circumstances.

Legal Services attorneys can often help clients address related legal concerns such as housing discrimination, employment discrimination, benefits denials, immigration issues, family law issues, and criminal records expungement.

Other service providers, such as counselors, teachers, or healthcare providers, can assist with developing a plan to help your client overcome barriers to housing and employment. Providers – especially those who worked with your client while they were incarcerated – can also offer valuable insight into your client’s needs.

Social supports, such as family, friends, peer support groups, and clergy, can help brainstorm housing solutions or present opportunities for shared housing or subletting. They can also help serve as points of contact with a client who lacks a phone, internet access, or a temporary address.

Understand Relevant Laws. There is no need to be a legal expert, but it is important to know your client’s basic rights when it comes to housing and related issues, such as whether they can relocate out of county or state. Organizations such as [Root and Rebound](#) have helpful guides and primers on some of the California state laws that impact people on the registry.

Consider All Possible Resources. Thoroughly assess your client for any special services or resources that they might be eligible for. Your client on the registry may also be a veteran, a survivor of domestic violence, or fall into another category for which special funding or organizations exist.

Use Information on the Registry. The Megan’s Law website maps the addresses of people on the registry, therefore showing where these folks have found housing. This information can be used by providers⁴ to identify landlords or management companies that are open to housing their clients.

Help Clients Reframe Their Stories. If you think that a landlord is going to learn about your client’s record, it’s a good idea to help your client plan how to talk about their conviction in a candid way that also shifts the focus to their strengths and rehabilitative efforts. Letters of recommendation or support from former landlords, former neighbors, employers, teachers, counselors, and other community members can provide important supporting evidence. Certificates showing program completion are also useful.



⁴ Do not ask clients themselves to access the Megan’s Law website, as they may be prohibited from doing so.

Housing Undocumented Households

Undocumented households may be assisted some federally and state-funded housing and services programs even if no one in the family is a citizen or has a green card. Assessing your program to ensure barriers are as low as possible for undocumented households is essential to running a Housing First-aligned program and achieving a completely Housing First homeless system of care. The following document outlines current allowances and restrictions concerning undocumented households so providers can better serve this population. Please check with your contract manager or funder to ensure that your program is in compliance with the most up-to-date rules.

CoC and ESG Programs

Applicable Rule

The law governing noncitizen eligibility for CoC and ESG housing programs is Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA). Generally speaking, PRWORA restricts eligibility for “federal public benefits” to citizens and qualified aliens (8 U.S.C. 1611). However, as described below, PRWORA has broad exceptions that allow undocumented households to receive a number of housing and homeless services from HUD homeless assistance programs and exempt non-profits from verifying citizenship status.

In a 2016 letter from the Attorney General and the Secretaries of HUD, DOJ, and HHS, regarding PRWORA, these agencies collectively stated that housing and service providers **must not turn away immigrants experiencing homelessness or victims of domestic violence or human trafficking, on the basis of their immigration status, from certain housing and services necessary for life or safety** – such as street outreach, emergency shelter, and short-term housing assistance including transitional housing and rapid re-housing funded through the ESG and CoC Programs. Further, the relevant rule states that the following are NOT subject to PRWORA’s citizenship verification requirements:

- ◇ Programs that don’t fall under definition of “federal public benefit”
- ◇ Programs, specified by the Attorney General, that meet the following exceptions:
 - Deliver in-kind services at the community level;
 - Do not condition the provision, amount, or cost of assistance on recipient’s income or resources; and
 - Are necessary for the protection of life or safety
- ◇ Public benefits provided by nonprofit charitable organizations

Please see the chart below for a complete list of CoC and ESG Programs that cannot turn away people based on immigrations status. ¹

CoC Program Activities That Cannot Turn People Away Based on Immigration Status	ESG Program Activities That Cannot Turn People Away Based on Immigration Status
Supportive Services Only, including Street Outreach	Street Outreach Services
Safe Haven	Emergency Shelter
Transitional Housing when the recipient or subrecipient owns or leases the building used to provide TH ²	Rapid Rehousing Assistance
Rapid Rehousing Assistance	----

Based on the chart above, the primary program type that *is* covered by PRWORA are permanent supportive housing (PSH) programs.

However, **PRWORA further exempts all “nonprofit charitable organizations” from having to verify immigration status of program participants.** If nonprofits choose to adopt a policy of verifying immigration status, then they must verify status for everyone in a non-discriminatory manner according to the guidelines of the HUD funded program they are under. Therefore, if a PSH provider is a non-profit entity, they are not required to verify citizenship.

If a PSH provider is a state or local government, the provider is required to comply with PRWORA and should consult with city or county counsel to develop a compliance strategy.

Provider Takeaways

¹ These project types are exempt from PROWRA because they meet the three-part exemption test:

- ◇ Deliver in-kind services at the community level;
- ◇ Do not condition the provision, amount, or cost of assistance on recipient’s income or resources; and
- ◇ Are necessary for the protection of life or safety

² TH where RA is provided does NOT meet the exemption b/c RA is based on program participant income, therefore does not meet the 3-part test

- ◇ PRWORA governs CoC and ESG housing programs.
- ◇ PSH programs and a very limited set of TH programs are to serve only citizens and qualified aliens.
- ◇ Nonprofit administrators of HUD's homeless assistance programs, including PSH providers, are **NOT** required to verify their clients' citizenship status.
- ◇ Most other program types may not turn people away based on immigration status.
- ◇ PSH providers that are run by state or local governments are required to comply with PRWORA. These providers should consult city or county counsel to assess next steps and ensure compliance with the law.
- ◇ Having a birth certificate or social security card/number is not required by HUD regulations or guidance.

Lower Barriers

- ◇ Nonprofit organizations that run CoC and ESG housing programs should consider eliminating any citizenship verification processes including, but not limited to, requesting a birth certificate or social security information.
- ◇ All housing providers that offer the services in the chart above should ensure that all program staff are aware that these services are NOT subject to PRWORA and cannot turn away people based on immigration status.

Section 8 and Public Housing

Applicable Rule

The rules governing other HUD housing programs restricts the eligibility for some non-citizens. Section 214 of the Housing and Community Development Act restricts eligibility for certain housing programs to citizens and certain noncitizens. HUD's original regulations implementing Section 214 were promulgated by final rule published in 1995. In 1996, HUD published a final rule eliminating the repetitiveness of duplicative regulations by consolidating the noncitizens requirements in a new subpart E to 24 CFR part 5 (captioned "Restrictions on Assistance to Noncitizens"), where they continue to be codified at present.

The Act restricts certain programs with regard to eligibility of non-citizens, including but not limited to:

- ◇ Section 8 Housing Assistance/ Housing Choice Voucher Program
- ◇ Public Housing
- ◇ Section 235 (Home Ownership) and Section 236 Housing
- ◇ Rent Supplement Program

- ◇ Housing Development Grant Program (HoDAG)

Section 214 does **NOT** apply to many programs including, but not limited to, CDBG, HOME, HOPWA, McKinney Act Shelter and Transitional Housing Programs (SPC and Supportive Housing). Public Housing Authorities and entities that administer the programs referenced above should consult to [24 CFR part 5](#) and counsel to ensure that programs are identifying any lawful opportunities to serve undocumented households and lowering any unnecessary barriers. There are special exceptions and rules applicable to Public Housing Authorities and thus Housing Authority providers should seek additional guidance to understand how to best serve undocumented households.

Provider Takeaways

- ◇ Providers who are Public Housing Authorities or who administered one of the programs covered by this rule should work with counsel to identify any lawful opportunities to serve undocumented households and lowering any unnecessary barriers.
- ◇ Providers should implement any barriers to serving undocumented populations that are not required by the rule.
- ◇ Pay attention to any proposed rules that may modify the ability of these programs to serve undocumented households.

Additional Resources

- ◇ [Comprehensive Resource List from National Immigrant Women's Advocacy Project](#)
- ◇ [Non-profit Guidance Regarding Immigration Enforcement](#)
- ◇ [Homelessness and Immigration Enforcement: What You Should Know](#)
- ◇ [HUD/HHS/DOJ Joint Letter Regarding Immigrant Access to Housing and Services](#)
- ◇ [SNAPS Fact Sheet on PRWORA for HUD's Homeless Assistance Programs](#)