

Date of Hearing: March 20, 2024

ASSEMBLY COMMITTEE ON HOUSING AND COMMUNITY DEVELOPMENT

Christopher M. Ward, Chair

AB 2520 (Ramos) – As Introduced February 13, 2024

**SUBJECT:** Housing: youth-specific coordinated entry systems

**SUMMARY:** Requires applicants for the Homelessness Housing, Assistance, and Prevention (HHAP) Program to utilize future funding to create and maintain youth-specific coordinated entry systems (CES). Specifically, **this bill**:

- 1) Requires upon appropriation, beginning with the 2024-25 fiscal year, the California Interagency Council on Homelessness (Cal-ICH) to require HHAP applicants to do all of the following:
  - a) Create and maintain a youth-specific CES that includes youth-specific access points and a youth-centered assessment tool and prioritization policy;
  - b) Provide that an applicant’s prioritization policy involving youth shall not be based on length of time the youth has been homeless; and
  - c) Create an array of youth-specific housing inventory to align with the needs of youth in their region.
- 2) Provides that if an applicant already maintains a youth-specific CES, the applicant must document all of the following in their HHAP application:
  - a) How the applicant’s housing assessment is youth-specific, including how the assessment is trauma-informed; and
  - b) The applicant’s prioritization policy.
- 3) Defines “youth-specific” to mean for a homeless youth, defined as an unaccompanied youth between 12 and 24 years of age, inclusive, who is experiencing homelessness, as defined in subsection (2) of Section 725 of the federal McKinney-Vento Homeless Assistance Act (42 U.S.C. Sec. 11434a(2)). “Homeless youth” includes unaccompanied youth who are pregnant or parenting.

**EXISTING LAW:**

- 1) Established HHAP to provide jurisdictions with one-time grant funds to support regional coordination and expand or develop local capacity to address their immediate homelessness challenges informed by a best-practices framework focused on moving homeless individuals and families into permanent housing and supporting the efforts of those individuals and families to maintain their permanent housing. Directs Cal-ICH to administer HHAP. (Government Code (GC) Section 50216)
- 2) Requires HHAP to be used for evidence-based solutions that address and prevent homelessness among eligible populations, including any of the following:

- a) Rapid rehousing, including rental subsidies and incentives to landlords, such as security deposits and holding fees;
  - b) Operating subsidies in new and existing affordable or supportive housing units, emergency shelters, and navigation centers. Operating subsidies may include operating reserves;
  - c) Street outreach to assist persons experiencing homelessness to access permanent housing and services;
  - d) Services coordination, which may include access to workforce, education, and training programs, or other services needed to promote housing stability in supportive housing;
  - e) Systems support for activities necessary to create regional partnerships and maintain a homeless services and housing delivery system, particularly for vulnerable populations, including families and homeless youth;
  - f) Delivery of permanent housing and innovative housing solutions, such as hotel and motel conversions;
  - g) Prevention and shelter diversion to permanent housing, including rental subsidies; and
  - h) Interim sheltering, limited to newly developed clinically enhanced congregate shelters, new or existing noncongregate shelters, and operations of existing navigation centers and shelters based on demonstrated need. Demonstrated need for purposes of this paragraph shall be based on the following:
    - i) The number of available shelter beds in the city, county, or region served by a continuum of care;
    - ii) The number of people experiencing unsheltered homelessness in the homeless point-in-time count;
    - iii) Shelter vacancy rate in the summer and winter months;
    - iv) Percentage of exits from emergency shelters to permanent housing solutions; and
    - v) A plan to connect residents to permanent housing. (GC Section 50220.7)
- 3) Requires, beginning with the third round of HHAP, applicants to provide the following information for all rounds of program allocations through a data collection, reporting, performance monitoring, and accountability framework, as established by Cal-ICH:
- a) Data on the applicant's progress towards meeting their outcome goals, which must be submitted annually on December 31 of each year through the duration of the program;
  - b) If the applicant has not made significant progress toward their outcome goals, the applicant must submit a description of barriers and possible solutions to those barriers;

- c) Applicants that do not demonstrate significant progress towards meeting outcome goals must accept technical assistance from the council and may also be required to limit the allowable uses of these program funds, as determined by the council;
  - d) A quarterly fiscal report of program funds expended and obligated in each allowable budget category approved in their application for program funds; and
  - e) If the applicant has not made significant progress toward their outcome goals, then the applicant must report on their outcome goals in their quarterly report. (GC Section 50220.7)
- 4) Requires Cal-ICH to post a statewide report that aggregates each applicant's outcome goals into a single statewide set of metrics. (GC Section 50220.7)
- 5) Requires each recipient that receives a round three program allocation to submit to Cal-ICH a final report, as well as detailed uses of all program funds, no later than October 1, 2026. (GC Section 50220.7)
- 6) Requires each recipient that receives a round four program allocation to submit to Cal-ICH a final report, as well as detailed uses of all program funds, no later than October 1, 2027. (GC Section 50220.7)

**FISCAL EFFECT:** Unknown.

**COMMENTS:**

**Author's statement:** According to the author, "Addressing youth homelessness is a top priority and in order to do so it requires youth specific solutions. We know that up to 50% of adults experiencing chronic homelessness had their first homeless experience between the ages of 16-24. Additional research estimates 85% of people who experience long-term homelessness come from the "youth-to-adult" pipeline. With AB 2520, we aim to provide a developmentally-appropriate fix to the gap in services and ensure Continuums of Care include youth-specific entry points, assessment, and prioritization scores, and youth appropriate housing and services. By doing so, we can go a long way in reducing the number of people experiencing homelessness in the long run."

**HHAP:** The HHAP program was created to provide jurisdictions funding to expand or develop local capacity to address their immediate homelessness challenges informed by a best-practices framework focused on moving homeless individuals and families into permanent housing and supporting the efforts of those individuals and families to maintain their permanent housing. Large cities (with a population of 300,000 or more), counties, Continuums of Care (CoCs), and tribes can apply for HHAP funding. There have been five rounds of funding for HHAP. Applicants are currently submitting plans for the fifth round of funding. While Round 3 of HHAP Program required applicants to develop a Local Action Plan and performance goals, it did not require regional coordination. Round 5 of HHAP required applicants to develop a regionally coordinated homeless action plan and apply as a region.

Round 3 and 4 both authorized the use of HHAP funds to create a youth-specific CES or youth-specific coordinated entry access points, or to improve the coordinated entry assessment tool to ensure that it contemplates the specific needs of youth experiencing homelessness.

The Homeless Emergency Aid Program (HEAP) and subsequently HHAP requires applicants to use a percent of their allocation to assist homeless youth. A total of \$276 million from both programs is required to be used by local jurisdictions to address youth homelessness. The John Burton Foundation analyzed the impact these funds had regionally on the reducing the number of homelessness youth by comparing the 2020 point-in-time-count (PIT) to the 2022 PIT. They found a 21% reduction in homelessness among unaccompanied youth. California's decrease in youth homelessness is 2.6 times greater than the reduction in all other states – all other states decreased by 8%.

***Homeless Youth in California:*** According to the 2023 Point-In-Time count, there are 10,173 homeless youth and another 2,219 parenting youth and their children experiencing homelessness in California. Youth homelessness is often rooted in family conflict. Other contributing factors include economic circumstances like poverty and housing insecurity, racial disparities, and mental health and substance use disorders. Young people who have had involvement with the child welfare and juvenile justice systems are also more likely to become homeless. Evidence has also shown that being homeless as a youth is a key indicator of adult homelessness.

***Coordinated Entry Systems:*** In 2012, the federal Department of Housing and Urban Development (HUD) began requiring CoCs to use a CES. In 2017 HUD mandated the use of CES for all CoCs as a condition of receiving federal funds.

CES is a CoC-established system-wide process to quickly and equitably coordinate the access, assessment, prioritization and referrals to housing and services for people experiencing or at imminent risk of homelessness. CES is an evidence-based strategy that focuses on housing and service coordination designed to link people experiencing homelessness to the most appropriate housing solution based on their needs.

There are 44 CoCs in the state. Each CoC geographically covers the county in which it is situated. A CoC is either controlled by county government or it is created as a nonprofit with representation from local nonprofit homelessness services providers and in some cases representatives from the county and cities it covers geographically. The CES is meant to be a community-wide tool and therefore people entered into system are from the entire county. The CES is also meant to remove racial bias in who is prioritized for housing and services and prioritize people based on need. Significant racial disproportionality exists among those experiencing homelessness, with people who identify as Black/African American very overrepresented.

CESs prioritize individuals for housing based on the length of time they have been homeless. Youth experience homelessness differently than adults. They are more likely to cycle in and out of homelessness, staying temporarily with friends or family, but not securing a permanent housing solution.

HUD has provided guidance to CoCs on developing and implementing a coordinated entry processes specific to working with runaway and homeless youth populations but does not mandate inclusion. HUD encourages CoCs with a network of youth-serving programs to consider whether they would better serve youth by creating coordinated entry access points dedicated to underage and transition aged youth. Access points can be located in areas where homeless youth feel comfortable and safe, staffed with people who specialize in working with youth. In addition, CoCs should take care to ensure that if they use separate coordinated entry

points for youth, that those youth can still access assistance from other parts of the homeless assistance system and that youth who access other coordinated entry points can access assistance from youth serving programs.

This bill would require all HHAP applicants – CoCs large cities, and counties – to maintain a youth-specific CES; however, only CoCs receive funding to maintain a CES by HUD. The committee may wish to amend the bill to limit the requirements of the bill to CoCs to better align the bill with existing processes.

HUD policy guidance does not require a CoC to create a separate youth-specific CES – instead, a CoC can integrate youth-specific access points into an existing CES. The committee may wish to allow a CoC to meet the requirements of the bill by integrating youth-specific assessments and access points into the existing CES.

The state does not provide ongoing funding to CoCs to maintain CES. Although HHAP can be used for this purpose, it is not ongoing and priority for HHAP funding is for exits into permanent housing. The committee may wish to allow CoCs to integrate youth-specific assessment tools in the existing CES rather than create a new system. This aligns with HUD direction to CoCs in creating a youth-specific CES.

**Committee Amendments:** The following amendments align this bill more closely with HUD’s policy guidance to CoCs for creating a youth-specific CES:

- 1) Apply the requirements of this bill to CoCs only and not all applicants of HHAP
- 2) Apply the requirements of this bill to 2026-27 HHAP funding. This would mean Round 6 of HHAP, should funding be allocated in the budget.
- 3) Allow CoCs to incorporate youth-specific standards into their existing CES without creating another system.
- 4) Require a CoC to identify an existing body composed of youth with lived experience of homelessness that the CoC and other HHAP grantees shall consult with regularly to receive input on policies, program design, and implementation of interventions for youth.

## SEC. 2.

*Section 50223.5 is added to the Health and Safety Code, to read:*

### 50223.5.

*(a) Upon appropriation, and beginning with the ~~2024-25~~ 2026-27 fiscal year, the council shall require applicants Continuums of Care’s to do all of the following:*

*(1) Create ~~and~~ or maintain a documented youth-specific process with their coordinated entry system. This process shall specify how youth are matched to youth specific resources, the means by which youth can access the coordinated entry system, which shall include factors in addition to length of time experiencing homelessness, and how youth accessing the coordinated entry system through adult or family programs can access youth-specific supports. ~~youth specific access points and a youth centered assessment tool and prioritization policy.~~*

~~5) (A) An applicant's prioritization policy involving youth shall not be based on length of time the youth has been homeless.~~

**(2) Implement a youth-specific assessment tool that considers the unique needs of youth experiencing homelessness and the unique presentation of homelessness among youth.**

**(3) Create or identify an existing body composed of youth with lived experience of homelessness that the Continuum of Care and other HHAP grantees shall consult with regularly to receive input on policies, program design, and implementation of interventions for youth.**

(4) Create an array of youth-specific housing inventory to align with the needs of youth in their region.

(b) If ~~an applicant~~ **the Continuums of Care** states that they already maintain a youth-specific coordinated entry system, the applicant shall document all of the following in their application:

(1) How the ~~applicant's~~ **the Continuums of Care**'s housing assessment is youth-specific, including how the assessment is trauma-informed.

(2) The ~~applicant~~ **Continuums of Care**'s prioritization policy.

(c) For purposes of this section, "youth-specific" means for a homeless youth as defined in Section 8260 of the Welfare and Institutions Code.

**Double-Referred:** This bill was also referred to the Assembly Committee on Human Services where it will be heard should it pass out of this committee.

## **REGISTERED SUPPORT / OPPOSITION:**

### **Support**

California Coalition for Youth (Sponsor)  
 Alliance for Children's Rights  
 Bill Wilson Center  
 Bright Futures for Youth  
 California Alliance of Caregivers  
 Children Now  
 Family Assistance Program  
 Home Start, INC  
 Larkin Street Youth Services  
 Los Angeles LGBT Center  
 National Network for Youth  
 Orangewood Foundation  
 Power CA Action  
 Sacramento LGBT Community Center  
 San Diego Youth Services  
 YMCA of San Diego County

### **Opposition**

None on file.

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