

Date of Hearing: April 8, 2025

ASSEMBLY COMMITTEE ON HUMAN SERVICES

Alex Lee, Chair

AB 249 (Ramos) – As Amended March 27, 2025

SUBJECT: Housing: Homeless Housing, Assistance, and Prevention program: youth-specific processes and coordinated entry systems

SUMMARY: Provides that the California Department of Housing and Community Development (HCD) must require a Continuum of Care (CoC) to annually certify specified processes regarding youth-specific coordinated entry systems. Specifically, **this bill:**

- 1) Provides that, upon appropriation, and beginning with the 2026-27 fiscal year, HCD shall require a CoC to annually certify that they do all of the following:
 - a) Create or maintain a documented, youth-specific process with their respective coordinated entry system that specifies how youth are matched to youth-specific resources; the means by which youth can access the coordinated entry system, to 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.
 - b) Implement a youth-specific assessment tool that considers the unique needs of youth experiencing homelessness and the unique presentation of homelessness among youth;
 - c) Create a body or identify an existing body composed of youth with lived experience of homelessness that the CoC and other Homeless Housing, Assistance, and Prevention program (HHAP) grantees are required to consult with regularly to receive input on policies, program design, and implementation of interventions for youth; and,
 - d) Identify an array of youth-specific housing inventory to align with the needs of youth in their region.
- 2) Requires, if a CoC states that they already maintain a youth-specific coordinated entry system, the CoC to document in their application how the CoC's housing assessment is youth-specific, including how the assessment is trauma-informed, and the CoC's prioritization policy.
- 3) Clarifies that for purposes of these provisions, "youth-specific" means for a homeless youth, defined as an unaccompanied youth between 12 and 24 years of age, as defined in state law in 3) below.
- 4) Makes the following findings and declarations:
 - a) HHAP is a multiround grant program administered by HCD. Commencing with Round 3 of HHAP, applicants have been asked to prioritize their funding to make homelessness response systems improvements. Specifically, existing law indicates that applicants could use their funding to create a youth-specific coordinated entry system;

- b) Youth-specific coordinated entry systems allow youth to be assessed against other youth, rather than against adults, including chronically homeless adults, whose time on the street will always place them above youth if vulnerability is measured by time spent on the street and overall health. Further, youth need housing options that meet their developmentally appropriate needs, which would include a mix of rapid rehousing, time-limited or interim housing, and permanent supportive housing; and,
- c) In the 2023 Annual Homelessness Assessment Report (AHAR) to Congress from the federal Department of Housing and Urban Development (HUD), California reported the largest number of unaccompanied youth (10,173 people), accounting for more than a fourth of all unaccompanied youth nationally (29%), with 68.2% of these youth being unsheltered.

EXISTING LAW:

State law:

- 1) Establishes the Housing First and Coordinating Council (Cal ICH), formerly known as the Homelessness Coordinating and Financing Council (HCFC), to oversee and coordinate the implementation of the Housing First guidelines and regulations in California and to identify resources and services that can be accessed to prevent and end homelessness in California. (Welfare and Institutions Code [WIC] § 8255 *et seq.*)
- 2) Defines "Housing First" practices as an evidence-based model that uses housing as a tool, rather than a reward, for recovery and centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. (WIC § 8255 (d)(1))
- 3) Defines "homeless youth" to mean an unaccompanied youth between 12 and 24 years of age, inclusive, who is experiencing homelessness, as defined in the federal McKinney-Vento Homeless Assistance Act, as described in 12) in federal law below. Clarifies "homeless youth" include unaccompanied youth who are pregnant or parenting. (WIC § 8260(d))
- 4) Establishes 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. Directed Cal ICH to administer HHAP until July of 2024. (Health and Safety Code [HSC] § 50217 *et seq.*)
- 5) Defines a "continuum of care" to have the same meaning as defined by HUD, as described in 15) in federal law below. (HSC § 50230(d))
- 6) Defines a "coordinated entry system" to mean a centralized or coordinated process developed pursuant to the Code of Federal Regulations (CFR), as that section read on January 10, 2019, designed to coordinate homelessness program participant intake, assessment, and provision of referrals. Requires a centralized or coordinated assessment system to cover the geographic area, be easily accessed by individuals and families seeking housing or services, be well advertised, and include a comprehensive and standardized assessment tool. (HSC § 50230(e))

- 7) 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; Street outreach to assist persons experiencing homelessness to access permanent housing and services;
 - c) Services coordination, which may include access to workforce, education, and training programs, or other services needed to promote housing stability in supportive housing;
 - d) 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;
 - e) Delivery of permanent housing and innovative housing solutions, such as hotel and motel conversions;
 - f) Prevention and shelter diversion to permanent housing, including rental subsidies; or,
 - g) Interim sheltering, limited to newly developed clinically enhanced congregate shelters, new or existing non-congregate shelters, and operations of existing navigation centers and shelters based on demonstrated need, as specified. (HSC § 50220.7(e))
- 8) Requires, beginning with the third round of HHAP, applicants to provide specified information for all rounds of program allocations through a data collection, reporting, performance monitoring, and accountability framework, as established by Cal ICH. (HSC § 50223(a))
- 9) Requires each recipient that receives a round three HHAP allocation to submit a final report to HCD, as well as detailed uses of all program funds, no later than October 1, 2026. (HSC § 50223(b))
- 10) Requires each recipient that receives a round four HHAP allocation to submit to HCD a final report, as well as detailed uses of all program funds, no later than October 1, 2027. (HSC § 50223(c))
- 11) Establishes requirements for applicants to receive a round three HHAP allocation, including that the application should include a local homelessness action plan that assesses the current number of people experiencing homelessness and existing programs within the jurisdiction. Specifies the plan should address strategies to meet outcome goals, including improving coordinated entry systems to eliminate racial bias or creating youth-specific coordinated entry systems. (HSC § 50220.7)

Federal law:

- 12) Establishes the McKinney-Vento Homeless Assistance Act to address the education of children and youth experiencing homelessness. Homeless children and youth are defined as individuals without a fixed, regular, and adequate nighttime residence. It encompasses those living in shelters, motels, cars, parks, or other inadequate conditions. Defines unaccompanied youth as homeless children or youth not in the physical custody of a parent or guardian. (42 United States Code (U.S.C.) § 11434a(2))
- 13) Establishes the United States Interagency Council on Homelessness to coordinate a federal response to homelessness and create a national partnership at every level of government and with the private sector to end homelessness. (42 U.S.C. § 11311)
- 14) Establishes the responsibilities of the CoC including requirements for establishing and operating either a centralized or coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. Requires the CoC to develop a specific policy to guide the operation of the centralized or coordinated assessment system on how its system will address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers. Requires this system to comply with any requirements established by HUD by Notice. (24 CFR § 578.7)
- 15) Defines “continuum of care” to mean the group organized to carry out specified responsibilities under the McKinney Vento Act that is composed of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate. (24 CFR § 578.3)

FISCAL EFFECT: Unknown, this bill has not been analyzed by a fiscal committee.

COMMENTS:

Background: *The California Interagency Council on Homelessness.* Cal ICH, as it is known today, began with the initial passage of SB 1380 (Mitchell), Chapter 847, Statutes of 2016, and the establishment of the HCFC. The goal of the HCFC was to implement Housing First practices across the state to reduce the prevalence and duration of homelessness in California.

Cal ICH is housed within the California Business, Consumer Services and Housing Agency and, according to their website, is California’s facilitator, coordinator, and leader for policy development and research to support state and local jurisdictions in their work to prevent and end homelessness in California. Cal ICH, co-chaired by the Secretary of the California Health and Human Services Agency, also convenes a voting body comprised of leaders from 18 state departments and agencies as well as two members of the public appointed by the Legislature.

As the homelessness crisis worsened in 2020 during the COVID-19 pandemic, it became apparent that more investments were needed to offer the proper resources and techniques to vulnerable California residents. In 2021, HCFC was renamed and restructured to become Cal ICH. In addition to the administration of Housing First policies, Cal ICH now also works to provide purposeful coordination of services and benefits to align the many state departments using different programs to help address homelessness.

Through an adopted Action Plan, developed with input from over 60 community entities, public agencies, nonprofits, and issue experts, Cal ICH has landed on five action areas and goals for the state. As required by law, the Action Plan was first adopted in March 2021 and has since been updated in September 2022, September 2023, and again in December 2024. According to Cal ICH, the plan focuses on the highest-priority strategies that will have the greatest impact, with a commitment to update activities annually. The latest update captures a three-year roadmap for addressing homelessness in California and defines five action plan goals: help more people leave unsheltered homelessness; help more people into housing; ensure people do not experience homelessness again; prevent more people from experiencing homelessness; and create more housing.

Currently, according to the Homeless Data Integration System, for every five individuals who access homelessness services in California, only one is housed each year, leaving four unhoused. Over the course of this three-year plan, the Council outlined a goal of being able to house at least three out of every five people accessing homelessness services.

Continuums of Care were initiated by HUD and span all 50 states and six United States territories. California is divided into 44 CoCs with each CoC consisting of a wide-range of representatives from public and private entities that include civic groups, educational institutions, faith-based organizations, health and mental health care providers, local government, and non-profit agencies. In California, HCD plays a significant role in overseeing and supporting CoCs by administering state funding programs and providing guidance to CoCs to address homelessness effectively. Additionally, the Cal ICH coordinates efforts across state agencies and works closely with CoCs to implement strategies for reducing homelessness statewide.

In the context of California homelessness, a CoC refers to an integrated system of care designed to guide and track homeless individuals and families through a comprehensive array of housing and services. The CoC provides tailored housing and services based on the specific needs of individuals experiencing homelessness. By addressing individual circumstances, CoCs aim to achieve housing stability and independence. CoCs involve local entities, often at the county or group-of-counties level, to administer housing assistance programs. These entities collaborate to create and implement action plans that prevent future homelessness and improve outcomes for those currently without stable housing.

This bill would require HCD to ensure a CoC has a documented, youth-specific process with their respective coordinated entry system that requires information on how youth are matched to youth-specific resources and the means by which youth can access the system. *This bill* also requires HCD to ensure that each CoC creates a body or identifies an existing body composed of youth with lived experience of homelessness that the CoC and other HHAP grantees are required to consult with regularly to receive input on policies, program design, and implementation of interventions for youth.

Coordinated Entry Systems. A coordinated entry system is a vital component of the overall strategy to prevent and end youth homelessness. Coordinated entry system processes enable communities to effectively and efficiently use resources to house those experiencing or at-risk of homelessness. The goal is to make it easier for persons experiencing homelessness to access the housing and service resources that are best suited for them. Coordinated entry system processes are adapted specifically for working with runaway and homeless youth populations. These processes recognize the unique needs and developmental stages of young people who are unaccompanied and without stable housing.

Youth-specific coordinated entry systems ensure that all community stakeholders, including runaway and homeless youth providers, child welfare agencies, school systems, justice systems, workforce partners, and other youth-serving organizations, collaborate in planning and implementing a responsive and developmentally appropriate coordinated entry system processes. The intent is to standardize and streamline the process for youth access to homelessness-dedicated resources across the entire crisis response system, reducing the burden on youth to receive needed housing and supportive services. A youth-inclusive coordinated entry system process involves several key components:

- Ensuring youth can easily enter the system and access services;
- Using tools to measure vulnerability and need for housing and related services;
- Determining who receives resources based on community-wide availability; and,
- Facilitating connections to appropriate housing options and support.

Youth-specific coordinated entry systems allow youth to be assessed against other youth, rather than against adults, including chronically homeless adults, whose time on the street will always place them above youth if vulnerability is measured by time spent on the street. Further, youth need housing options that meet their developmentally appropriate needs, which would include a mix of rapid rehousing, time-limited or interim housing, and permanent supportive housing. Current law encourages HHAP applicants to create a youth-specific coordinated entry system but does not require that they do so. *This bill* would require CoCs to ensure there is a youth-specific process with their respective coordinated entry system.

According to the 2024 AHAR to Congress, *Part 1: Point-In-Time Estimates of Homelessness, December 2024*, findings include the number of homeless youth in 2024 were 38,170, a 10% increase nationally since last year.

The Homeless Housing, Assistance and Prevention Program was established in 2019 and provides local jurisdictions with funds to support regional coordination and expand or develop local capacity to address their immediate homelessness challenges. Cal ICH played a crucial role in the HHAP grant program by overseeing implementation and ensuring that the program aligns with guidelines and regulations, and focusing on evidence-based approaches like Housing First. The HHAP program consists of multiple funding rounds and requires Cal ICH to distribute the specified amounts to support local jurisdictions.

HHAP provides funding for a variety of services that address multiple aspects of homelessness, including providing interim housing. According to the April 2024 report by the Auditor of the

State of California entitled *Homelessness in California the State Must Do More to Assess the Cost-Effectiveness of Its Homelessness Program*, Cal ICH tracks the spending of HHAP funds by individual eligible use categories. Such tracking shows that, as of December 2022, about half of the HHAP Round 1 funding had been used for emergency shelters and operating subsidies. The amount used for each other eligible use was less than 15%. Grantees have until June 2026 to spend the funds from HHAP Rounds 2 and 3, and until June 2027 for Round 4.

Cal ICH ensured that these funds were allocated effectively and used to improve regional and systems coordination and monitor progress, provide technical assistance, and ensure accountability. Cal ICH was permitted to withhold funding until improvements are made, emphasizing program effectiveness and outcomes.

However, as noted in the Auditor's report, the Legislature intended to transfer all grant programs administered by Cal ICH to HCD by July 2024 to allow Cal ICH to better focus its efforts on providing statewide policy development and coordination.

As a result, the 2023-24 budget package transferred the administration of HHAP from Cal ICH to HCD.

Author's Statement: According to the Author, "In order to tackle chronic homelessness among our state's youth, we need to fix the services intended to help them. I believe the solutions are already in place, but the system that is supposed to help facilitate the process and to provide equity in services is unable to identify the individuals who are at greater risk in our community. [This bill] aims to fix the coordinated entry systems by including youth-specific entry points that would assess the unique circumstances our youth face so they can receive services sooner rather than later. This bill will ensure that our youth gets the support they need to be uplifted and allowed to continue moving forward in life."

Equity Implications: Youth are at a disadvantage when it comes to receiving support via CoCs because of the shorter lengths of time they experience being homeless due to their age. Often, vulnerability scores from coordinated entry systems, which are used by CoCs, are tied to a person's length of time experiencing homelessness. While coordinated entry systems are intended to help communities prioritize people who are most in need of assistance, it frequently scores homeless youth lower on the list, which directly impacts the type of services that are made available to them.

To prevent chronic homelessness among youth, *this bill* would serve as a developmentally appropriate fix to the gap in the system by ensuring CoCs include tailored services for homeless youth. *The bill* would require CoCs to implement a set of youth-specific entry points, assessments, and prioritization skills for youth-appropriate housing and other related services. Furthermore, *this bill* would require CoCs to identify housing inventory for youth available and that those units align with the needs of those in the region.

This bill attempts to bridge the divide that exists within the CoCs program between individuals who have been homeless for extended periods of time and youth with a more recent history of homelessness. This disparity has caused many youth to become chronically homeless simply because they do not receive severe enough scores by the coordinated entry system to merit immediate attention by certain services

Double referral: This bill was previously heard in the Assembly Housing and Community Development Committee on March 26, 2025, and was approved on an 11-0 vote.

RELATED AND PRIOR LEGISLATION:

B 2520 (Ramos) of 2024, was similar to this bill and would have provided that Cal ICH shall require CoCs to create youth-specific processes with their respective coordinated entry systems. *AB 2520 was held on the Assembly Appropriations Committee suspense file.*

REGISTERED SUPPORT / OPPOSITION:

Support

California Coalition for Youth (Sponsor)
Alliance for Children's Rights
Bill Wilson Center
California Alliance of Caregivers
California Apartment Association
California Court Appointed Special Advocate Association
Children Now
Community Human Services
Community Solutions
Covenant House California
Family Assistance Program
First Place for Youth
Hollywood Homeless Youth Partnership
Home Start INC.
Inland Equity Partnership
John Burton Advocates for Youth
Larkin Street Youth Services
National Association of Social Workers, California Chapter
National Center for Youth Law (UNREG)
National Network for Youth
Orangewood Foundation
Ready for Life Host Homes
Redwood Community Action Agency's Youth Service Bureau
Safe Place for Youth
San Diego Youth Services
Schoolhouse Connection
Sycamores
YMCA of San Diego County

Opposition

None on file.

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