

Seven Strategies Counties Can Implement to Ensure Housing Stability and Maximize Participation in Transitional Housing Program-Plus (THP-Plus) During COVID-19

The Transitional Housing Program-Plus (THP-Plus) program provides transitional housing and supportive services for former foster youth who exited foster care after age 18, a population that is particularly vulnerable during a crisis. Youth who are facing exit from THP-Plus programs during the current public health crisis and subsequent economic recession are at increased risk of homelessness because of the scarcity of other housing resources and transitional planning supports. Any period of homelessness or housing instability will compromise their health and the health of others, and will frustrate public health efforts to control the spread of COVID-19.

In recognition of these risks, California's Fiscal Year (FY) 2020-21 state budget included a provision authorizing counties to extend the THP-Plus program until June 30, 2021 for all participants, regardless of their age or the amount of time they have spent in the program. Counties can utilize this option along with a number of other strategies to assist youth in retaining stability during the current crisis.

The following seven strategies consist of both immediate and longer-term actions that counties can take to prevent youth participants from exiting the THP-Plus program at risk of homelessness, with depleted job opportunities, and without a safe place to shelter in place and practice social distancing. These strategies are intended to assist counties in their efforts to:

- Maintain youth in THP-Plus housing, avoiding exits whenever possible and creatively braiding funding streams to help youth stay put beyond their scheduled exit date.
- Quickly expand county housing options for transition age youth so that youth in THP-Plus can seamlessly transition to another supportive housing setting and so that THP-Plus-eligible youth have newly available housing options.
- Communicate a clear, county-wide strategy for ensuring stability in transitional housing to reduce uncertainty and anxiety among youth who, absent a county plan, would be scheduled to exit their programs without a safe transition plan.

1) Extend THP-Plus services to all former foster youth participating in THP-Plus as of July 1, 2020, without regard to their age or length of time they have received services until June 30, 2021.

Assembly Bill (AB) 79, signed by Governor Newsom on June 29, 2020, is a budget trailer bill that made temporary changes to the THP-Plus eligibility rules, authorizing counties to extend THP-Plus services to youth participants without regard to their age or length of time they have received services, until June 30, 2021.¹ This new provision was a direct response to the COVID-19 crisis, and it is the most immediate step counties should take to protect former foster youth and assist them in retaining their housing and transition planning services during the public health crisis.

If a county elects to implement this provision, it is applicable to all youth in the program, including youth who were already receiving THP-Plus services on July 1, 2020, and any youth

¹ Cal. Welf. & Inst. Code § 11403.2(a)(2)(C).

who enters a THP-Plus program on or after July 1, 2020. It cannot be applied on a case-by-case basis. The timeline for this THP-Plus extension runs simultaneously with the mandatory extension of the extended foster care program that was included in the FY 2020-21 state budget.² Normally, foster youth who turn 21 would age out of foster care and have the option of transitioning into THP-Plus. During this fiscal year, however, foster youth who have turned or will turn 21 on or after April 17, 2020 will continue to receive housing support until June 30, 2021—meaning that they will stay in their current housing instead of applying to THP-Plus. Therefore, counties that opt into the temporary THP-Plus extension should not see a spike in the demand for THP-Plus, because there will be no immediate demand from youth exiting extended foster care.

Because THP-Plus is a county-administered program, the California Department of Social Services (CDSS) is not requiring a formal “opt-in” process as it has previously required with similar programs. Instead, CDSS instructs counties to make their plans for extending THP-Plus at the local level in consultation with their contracted THP-Plus provider(s). Counties desiring additional guidance or information from the state should contact CDSS’ Transition-Age Youth Policy Unit at TAYPolicy@dss.ca.gov.

2) Expand THP-Plus eligibility by extending the age and duration requirements for students.

Although the extension provided by AB 79 offers temporary relief, the effects of the COVID-19 crisis will inevitably continue beyond June 30, 2021, when the extension is scheduled to end. Therefore, it is important for counties to identify alternate strategies to ensure housing stability for former foster youth beyond June 30, 2021.

One such strategy is to expand THP-Plus eligibility for students indefinitely. In 19 of California’s 47 counties with THP-Plus programs, eligible youth can participate in the program for a total of 24 months or until they turn 24 years old, whichever is earlier.³ The remaining 28 counties have opted in to an extension, authorized by SB 1252 (2014), that allows students to participate in THP-Plus for a total of 36 months or until they turn 25 years old, whichever is earlier.⁴ The purpose of the extension is to allow former foster youth to stay in THP-Plus while they complete their education (diploma, GED, college, or vocational certificate). For counties that have not yet done so, opting into the extension can help students stay housed for an additional year, giving them time to develop a transition plan.

Counties can opt into this extension for students by contacting TAYPolicy@dss.ca.gov. Once a county opts in to the age and time extension, they must apply the extension to all eligible participants (not on a case-by-case basis).⁵ Counties must also notify child welfare and probation departments, and notify THP-Plus providers in their county, after they have opted in to

² Assembly Bill 89 (2020-2021), §§ 55 & 58.

³ Cal. Welf. & Inst. Code § 11403.2(a)(2).

⁴ Cal. Welf. & Inst. Code § 11403.2(a)(2)(B); All-County Information Notice (ACIN) I-40-15 (May 27, 2015), p. 2, available at https://www.cdss.ca.gov/lettersnotices/EntRes/getinfo/acin/2015/I-40_15.pdf. A list of counties that offer the extension can be found on the JBAY website: <https://www.jbaforyouth.org/thp-plus-extension/>.

⁵ ACIN I-40-15, pp. 1-2.

the extension.

3) Supplement THP-Plus funds with new money available through the Transitional Housing Program.

Counties seeking additional funds to maintain THP-Plus participants in housing past the statutory age and duration requirements, particularly after the AB 79 extension ends on June 30, 2021, may utilize the new Transitional Housing Program (THP), administered by the California Department of Housing and Community Development (HCD). THP is meant to serve young adults up to age 25, with priority to former foster or probation youth. Unlike THP-Plus, there is no maximum duration, and the maximum age is 25 for all counties. THP provides a new, flexible source of funding to extend or expand THP-Plus, or broaden the population served.

Appropriated in the FY 2019-20 state budget, round one funding totaling \$8 million was allocated to county child welfare agencies in the spring and summer of 2020. Allocation acceptance materials for FY 2020-21 round two funding totaling \$8 million is due by November 12, 2020 to HCD. Acceptance materials include an allocation acceptance form, a resolution from the County Board of Supervisors, and a Government Agency Taxpayer ID form.⁶ HCD will execute Standard Agreements for round two funding with counties between December 2020 and February 2021. One additional FY 2021-2022 round three allocation of \$4 million will go out before the program is set to suspend on December 31, 2021, unless legislative action is taken to continue the program.⁷

4) Modify out-of-county eligibility policies and coordinate regionally to streamline referrals.

Counties with THP-Plus programs may accept former foster or probation youth who currently live in the county, but who emancipated from a different county.⁸ Youth experiencing homelessness during the current public health crisis may have exited care in a county with no available THP-Plus units, or they may have moved since exiting care.

Counties should take immediate steps to coordinate regionally, assess THP-Plus capacity across multiple counties, and develop expedited inter-county referral processes, in order to match former foster youth who are homeless or at risk of homelessness with available THP-Plus housing in other counties. This coordination also allows counties to share promising strategies they have already implemented to keep participants housed.

⁶ Detailed information about THP, including allocation acceptance materials, can be found on the HCD website: <https://www.hcd.ca.gov/grants-funding/active-funding/thp.shtml>.

⁷ The list of counties that accepted their round one THP allocations and allocation amounts can be found on the JBAY website: <https://www.jbaforyouth.org/sb-80-implementation/>.

⁸ Cal. Welf. & Inst. Code §§ 11400(s), 11403.2(a)(2); Manual of Policies and Procedures § 30-913.1. Each county's out-of-county policy can be found on the JBAY website: <https://www.jbaforyouth.org/out-of-county-youth-thp-plus/>.

5) Utilize new state funding allocated to counties through the Homeless Housing, Assistance, and Prevention (HHAP) Program to establish additional supportive housing for former foster youth at risk of or experiencing homelessness.

In the FY 2019-20 state budget, the Homeless Housing, Assistance, and Prevention (HHAP) Program was established with a one-time investment of \$650 million to address homelessness.⁹ Of this \$650 million, at least eight percent (\$52 million) is required to be dedicated to addressing homelessness among youth.¹⁰

In February, local homeless Continuums of Care, counties, and the state's 13 largest cities were allocated HHAP funds by the Homeless Coordinating and Financing Council (HCFC) within the California Business, Consumer Services and Housing Agency.¹¹ The HCFC began disbursing funding to local jurisdictions in the spring and summer of 2020.

Counties may consider utilizing their local HHAP funding to establish or expand Rapid Rehousing for youth, which is a very similar program model to THP-Plus and is one of the eligible uses of HHAP funds. The department or agency within each county receiving these funds varies across the state; it is most often the health and human services agency.¹²

Another round of HHAP funding was included in the FY 2020-21 budget, totaling \$300 million, of which a minimum of eight percent (\$24 million) must be dedicated to addressing youth homelessness. The timeline for administering the FY 2020-21 funding is forthcoming from the HCFC.

6) Collaborate with the local Public Housing Authority to provide subsidized housing and supportive services to former foster youth using Family Unification Program or Foster Youth to Independence vouchers.

Former foster youth may be eligible for one of two population-specific subsidized housing vouchers made available by the U.S. Department of Housing and Urban Development (HUD).

First, former foster youth age 18 and up to 24 are eligible for a Housing Choice Voucher (HCV) coupled with supportive services for up to 18 months through the Family Unification Program (FUP) awarded to Public Housing Authorities (PHAs) by HUD.¹³ PHAs administer FUP vouchers in partnership with county child welfare agencies, who are responsible for referring youth and providing supportive services. In April 2020, HUD awarded 12 California PHAs 558 new FUP vouchers (\$10.36 million).¹⁴

⁹ Information about HHAP can be found on the BCSH website:

https://www.bcsch.ca.gov/hcfc/hhap_program.html.

¹⁰ More information about the 8% youth set-aside in HHAP can be found on the JBAY website:

<https://www.jbaforyouth.org/hhapp/>

¹¹ Allocation amounts for each Continuum of Care, city and county can be found on the BCSH website:

https://www.bcsch.ca.gov/hcfc/documents/hhap_allocations.pdf

¹² Contact information for each county's agency or department receiving HHAP funds can be found on the

JBAY website: <https://www.jbaforyouth.org/hhap-county-contacts/>

¹³ Information about FUP Vouchers can be found on HUD's website:

https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/family.

¹⁴ The list of 12 PHAs awarded new FUP Vouchers can be found on HUD's website:

https://www.hud.gov/press/press_releases_media_advisories/HUD_No_20_046. The list of PHAs

Second, PHAs that administer traditional HCVs *not through FUP* may administer Tenant Protection Vouchers (TPVs) through HUD's Foster Youth to Independence (FYI) initiative. These vouchers provide the same combination of housing and services to eligible former foster youth as FUP for up to 36 months.¹⁵ HUD is accepting applications for FYI vouchers on a rolling basis.

In counties with greater demand for THP-Plus than can be provided, FUP and/or FYI vouchers can be used to offset this need and offer a similar combination of housing and services as THP-Plus. Vouchers may also be used to secure housing for eligible youth who are scheduled to exit THP-Plus housing because they have reached the statutory maximum time limits. Note that while PHAs cannot receive both FUP and FYI vouchers, county child welfare agencies can work with multiple PHAs to maximize the number of FUP and FYI vouchers available to foster youth in the county.

7) Alleviate THP-Plus participants' anxiety by clearly communicating county and program plans to preserve housing and services.

Even when counties and programs do exercise flexibility and creativity to keep THP-Plus participants in housing past the age and duration of eligibility, THP-Plus participants often are not aware that their counties or programs have developed such a plan. Faced with the possibility of homelessness, these youth expend needless time, energy, and fear trying to develop an emergency transition plan for themselves. Some participants have put their own health at risk by leaving home to seek resources.

Counties should make available through all of the channels commonly accessed by youth—online webpages, social media, phone calls, text messages, and written notices—all of their plans and strategies to ensure that no youth will leave THP-Plus without a transition plan due to their age or eligibility status. This should be part of a county strategy to talk with all youth in their county regularly to communicate new resources and updates and to gather feedback about service needs and challenges. For example, counties could host a “virtual drop-in center” for youth to bring problems or questions since physical drop-in spaces are not accessible. The county strategy should also include targeted communications for youth who are approaching a scheduled exit or transition from their THP-Plus program.

awarded FUP Vouchers in previous years can be found on HUD's website:
https://www.hud.gov/sites/dfiles/PIH/documents/Copyof_FUP_Awards_All%20Years_.pdf.

¹⁵ Information about FYI vouchers can be found on HUD's website:
https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/fyi_tpv. For a list of PHAs eligible to apply for TPVs for former foster youth, visit:
https://www.hud.gov/sites/dfiles/PIH/documents/PHAs_with_an_ACC_with_HUD_for_HCVs_that_do_not_administer_FUP_080929_8.5.2020_update.pdf.



For more information about this resource, or to share additional strategies, please contact:

Sabrina Forte, Staff Attorney, Youth Law Center (sforte@ylc.org)

Simone Tureck Lee, Director of Housing and Health, John Burton Advocates for Youth (simone@jbay.org)

Britt Harwood, Senior Attorney, Bay Area Legal Aid (bharwood@baylegal.org)

For resources and technical assistance from state agencies, please contact:

California Department of Social Services TAY Policy Unit, TAYPolicy@dss.ca.gov

California Department of Housing and Community Development, THP@hcd.ca.gov

Homeless Coordinating and Financing Council, hfc@bcsh.ca.gov