

Advocacy Strategies for Preventing Involuntary Exits from THP-NMD



Note: The information provided in this resource and the referenced materials do not constitute legal advice. All content is for general informational purposes only.

THP-NMD: An Advocacy Guide to Preventing Involuntary Exits

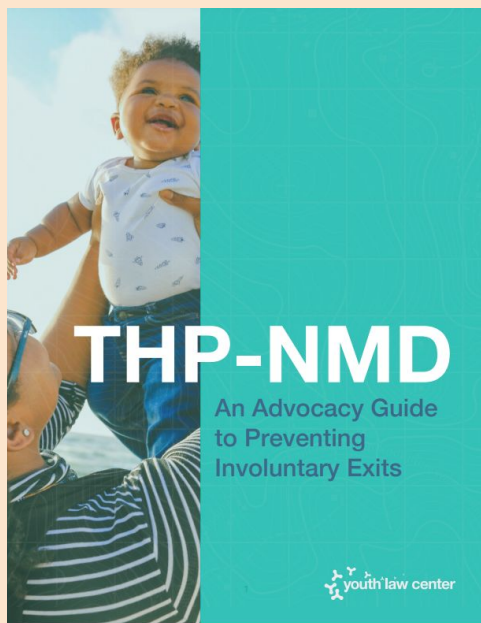


TABLE OF CONTENTS

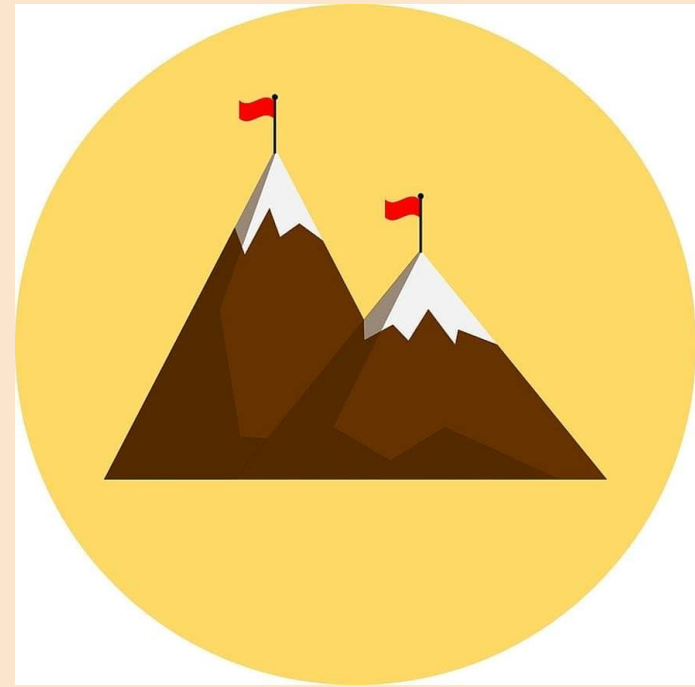
INTRODUCTION	1
EXTENDED FOSTER CARE: AN OVERVIEW	3
Eligibility	3
Personal Rights of Nonminor Dependents	4
Functions of the Juvenile Court and County Placing Agency	5
Supervised Independent Living Settings Available to Nonminor Dependents	8
THP-NMD STATUTORY AND REGULATORY REQUIREMENTS	11
What is THP-NMD?	11
Functions of the County Placing Agency and THP-NMD Agency	13
Administrative Processes Related to Funding Foster Care Placements	17
Advocacy Strategies: State Fair Hearings	20
State Licensing Rules for THP-NMD	24
THP-NMD Removal/Discharge Requirements	24
Filing a Licensing Complaint	27
Advocacy Strategies: CGL Complaints	30
STATE AND LOCAL LANDLORD-TENANT LAW	34
Applicability to Youth in THP-NMD	34
Rights and Process	36
Advocacy Strategies: Landlord-Tenant Law	38
FEDERAL AND STATE FAIR HOUSING LAWS AND REASONABLE ACCOMMODATION REQUIREMENTS	40
Reasonable Accommodation	40
Advocacy Strategies: Reasonable Accommodation	42
CONCLUSION	44
Appendix A: Housing Preservation Checklist for Youth and Advocates	45
Appendix B: Community Care Licensing Complaint Investigative Report	47
Appendix C: Resources and References	51
Related Resources	53
Endnotes	54

URL:

<https://www.ylc.org/resource/thp-nmd-an-advocacy-guide-to-preventing-involuntary-exits/>

Session Goals

1. Provide a foundational understanding of THP-NMD and the problem of involuntary exits
2. Outline the responsibilities of:
 - a. The juvenile court,
 - b. County placing agency, and
 - c. THP-NMD agencies/providers
3. Examine tools and advocacy strategies for preventing involuntary exits from THP-NMD
4. Apply tools and strategies to example scenarios



Extended Foster Care (EFC)

Overview of Extended Foster Care (EFC) (AB 12)

- What is it?
 - Provides an **optional** extension of foster care up to age 21
 - Includes housing, case management, and ongoing services to transition to independence
 - Youth in EFC are called “nonminor dependents” (NMDs)
- Who is eligible?
 - Youth must have turned 18 years old while subject to a foster care placement order through the juvenile dependency or delinquency court
 - Youth must continue to be under the placement and care authority of the county placing agency and live in a licensed or approved setting
 - Youth must have a transitional independent living case plan (TILCP) which documents the youth’s willingness to satisfy one of the five participation conditions under [WIC 11403\(b\)](#)

Optional Participation and Reentry

- Extended foster care is optional – but is opt out
- If a nonminor dependent (NMD) does not want to participate, they can request a hearing to terminate the juvenile court's jurisdiction
- When NMDs exit care, the juvenile court maintains general jurisdiction over them until age 21 to allow them the option to reenter (if they change their minds)
- Youth can re-enter care an unlimited number of times until they turn 21
- Reentry is intended to be accessible and easy
- An NMD is entitled to benefits and placement again as of the date the Voluntary Reentry Agreement is signed

Placement Options in Extended Foster Care (Age 18-21)

- Same as placements for minors (e.g. foster/resource parent)
- Three additional placements are available specific to NMDs called Supervised Independent Living Settings (SILS)
 - **Transitional Housing Placement Program for Non-minor Dependents (THP-NMD)**
 - Supervised Independent Living Placement (SILP)
 - Transitional Living Setting
- NMDs placed or residing out-of-state can still receive benefits (foster care benefits, right to a safe and appropriate placement, case management, and health insurance)

What is THP-NMD?

THP-NMD (Ages 18-21):

What Is It?

- The **Transitional Housing Placement Program for Nonminor Dependents (THP-NMD)** is a transitional housing program that provides BOTH housing and supportive services to nonminor dependent foster youth
- THP-NMD agencies are **licensed** as children's residential facilities by the Community Care Licensing Division (CCLD) of the California Department of Social Services (CDSS)

Who is Eligible for THP-NMD?

	THP-M (Transitional Housing Placement Program for Minors)	THP-NMD (Transitional Housing Placement Program for Nonminor Dependents)	<u>THP-Plus (Transitional Housing Program-Plus)</u>
Age	16 up to age 18	18 up to age 21	18 up to age 25
Duration of Program	No maximum duration if age requirements met	No maximum duration if age requirements met	36 months
Status of Foster Care Case	Must have an order for foster care placement under the jurisdiction of the juvenile court as a dependent or ward, including minors under transition jurisdiction.	Must be under the jurisdiction of the juvenile court as a NMD or ward, including NMDs under transition jurisdiction, or be under the placement and care authority of a county welfare or probation department pursuant to a voluntary reentry agreement.	Must have exited from the foster care system, including foster care placement through probation, on or after 18th birthday.

THP-NMD Distinguishing Characteristics

- Youth in THP-NMD **are** in foster care.
- Because youth in THP-NMD programs are in foster care, both the juvenile court and the county placing agency have responsibilities to the youth - therefore, advocates should be familiar with these distinct obligations.
 - Additionally, these youth should have court-appointed counsel (dependency attorney or juvenile defender) who may be a critical partner in advocacy
- Youth in EFC have rights under the Foster Youth Bill of Rights (WIC § 16001.9(a)) and retain their personal rights as adults under California law.

State Licensing Rules for THP-NMD

- To become a licensed THP provider, the provider must receive a certification from the county specifying whether it will serve foster youth 16 to 18 years old, nonminor dependents, or both.
- After receiving certification, the CCLD of CDSS can license THP providers using licensing standards in the Health & Safety Code and California Code of Regulations ([Title 22, Division 6, Chapter 7](#)), [AB 12 Interim Regulations for THPP](#) (Title 22, Division 6, Chapter 7, Subchapter 2: Nonminor Dependents), and the [Manual of Policy and Procedures](#) Sections 30-901—30-920.67).
- Additional guidance can be found in CDSS All County Information Notice (ACIN) I-40-11, and CDSS All-County Letters (ACLs) 11-69, 12-44, and 11-77.

Juvenile Court vs. County Placing Agency

Note: See pages 7-9 of guide for more details.	<u>Juvenile Court</u>	<u>County Placing Agency</u>
Eligibility for Extended Foster Care	Sole authority to determine eligibility under the law	Ensures ongoing eligibility
Finding and Maintaining Appropriate Placement	Must make a reasonable efforts and appropriate placement finding every 6 months	Responsible for finding and securing a safe and appropriate placement
Funding for Placement	Make necessary prerequisite findings to enable funding	Complete forms for funding and ensure continued eligibility and access to funds
Transitional Independent Living Case Plan (TILCP)	Reviews every 6 months and makes reasonable efforts and appropriateness findings	Engage in case planning with NMD every 6 months to ensure appropriateness and document reasonable efforts
Coordinating Services and Care	Reviews every 6 months and makes reasonable efforts and appropriateness findings	Obligated to provide ongoing reasonable efforts to effectuate TILCP (includes working with service providers)
Termination of Extended Foster Care	Sole authority to terminate jurisdiction over NMD after requisite hearing and findings	Does not have authority to terminate jurisdiction but may submit a report to the court recommending termination

County Placing Agency vs. THP-NMID Agency

Note: See pages 15-16 of guide for more details.	<u>County Placing Agency</u>	<u>THP-NMD Agency</u>
Safe & Appropriate Placement	Responsible for finding and securing a safe and appropriate placement	Responsible for providing safe and appropriate housing and services unless and until a NMD exits the program
Case Planning	Engage in case planning with NMD every 6 months to ensure appropriateness and document reasonable efforts, including engaging the Child and Family Team (CFT)	Must develop a Needs and Services Plan for each youth that is consistent with the youth's TILCP
Service Provision & Coordination	Obligated to provide ongoing reasonable efforts to effectuate TILCP (includes working with service providers).	Must include in the Needs and Services Plan all of a youth's current service needs and plans for providing services to meet those needs, and ensure that those service needs are met.
Removal/Discharge	Must make reasonable efforts to maintain the placement. If a NMD must move out of their THP-NMD placement, the placing agency is responsible for ensuring that NMD has an immediately available, safe, and appropriate placement	Must follow state law procedures for discharge, including providing discharge policies at the time of placement, and giving written notice to both the youth and the placing agency.

How Does This Impact Advocacy?

- Coordination of the various functions of the juvenile court, county placing agency, and THP-NMD agency can be critical for a NMD who relies on housing through THP-NMD.
- Advocates working with youth in THP-NMD need to recognize each entity's overlapping, yet distinct, functions to assess which advocacy strategies are most appropriate.
- Finally, advocates may need to employ multiple strategies simultaneously to preserve both a youth's housing and program eligibility, and will likely need to coordinate with the youth's dependency attorney or public defender to do so.

Involuntary Exits

Current and Former Foster Youth are Especially Vulnerable to Homelessness

Homeless during extended foster care

- Nearly **20%** of CalYOUTH participants reported that they were homeless at some point in EFC.¹

Homeless with a history of foster care or delinquency involvement

- **1 in 4** U.S. foster youth will be homeless within 4 years of exiting the system.²
- **27%** of SF homeless youth report a history of foster care and **33%** report a history of delinquency involvement.³
- Nationally, almost **40%** of homeless youth report a history of foster care.⁴

Criminal Justice & Child Welfare Interaction

- **28%** of CA prisoners under 30 yrs had a Child Welfare case or placement history.⁵
- Nearly **51%** of CalYOUTH participants had been arrested by age 23.⁶

1. Findings from the California Youth Transitions to Adulthood Study (CalYOUTH): Conditions of Youth at Age 21 2. US Interagency Council on Homelessness (2012) 3. 2015 San Francisco PIT Survey data 4. Administration for Children and Families, Family and Youth Services Bureau, Street Outreach Program. April 2016. 5. CA Dept of Social Services "CA State Prison-Child Welfare Data Linkage Study" 2014. 6. Findings from the California Youth Transitions to Adulthood Study (CalYOUTH): Conditions of Youth at Age 23

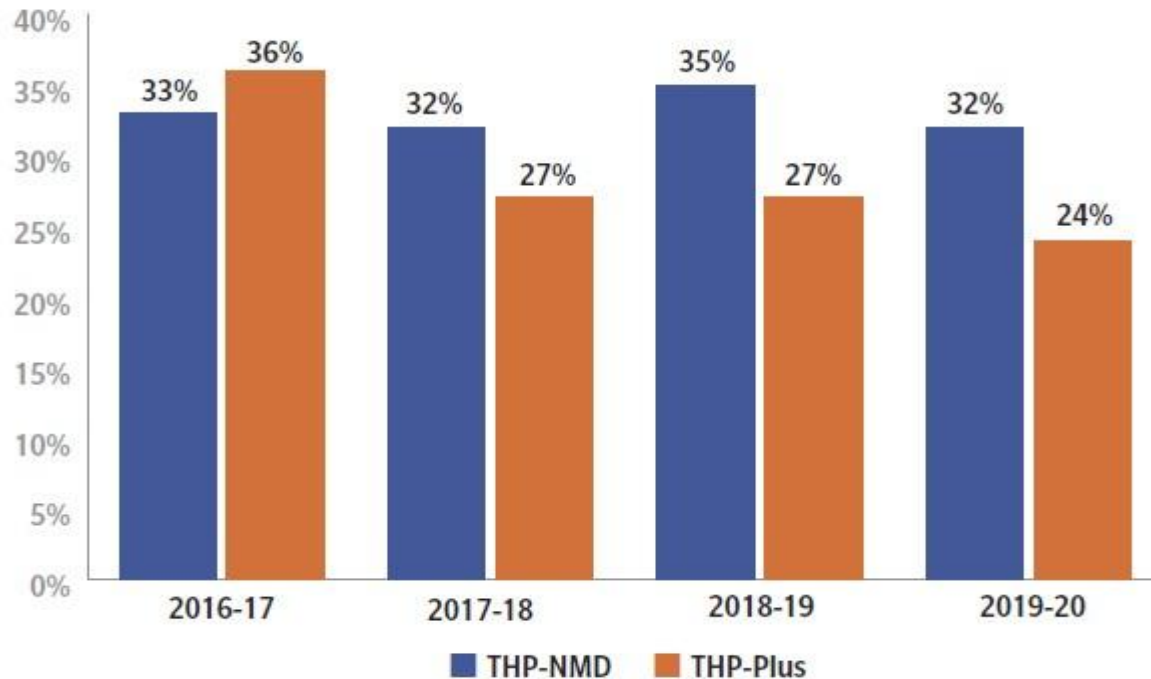
What Exactly is an Involuntary Exit?

An “**involuntary exit**” can encompass the loss of two distinct but overlapping components of THP-NMD:

- (1) the THP-NMD *program* (i.e. the supportive services and foster care funding), and
- (2) the youth’s possession of the *housing unit* that was secured by, but may not be owned by, the THP-NMD agency.

The loss of one component may not automatically result in the loss of the other.

Figure 15: Rate of Involuntary Youth Exits from THP-NMD and THP-Plus During the Fiscal Year²⁰



In FY 2020-2021, the rate of involuntary exits* from THP-NMD were **36%** and the rate of involuntary exits from THP-Plus were **16%**.

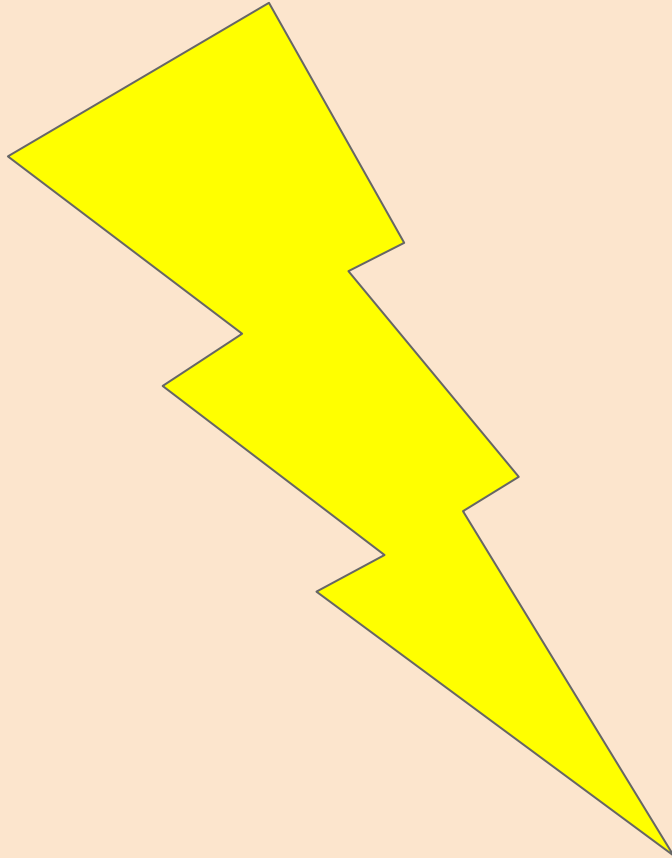
Source:
https://jbay.org/wp-content/uploads/2021/12/2021AR_Census.pdf

Source: John Burton Advocates for Youth. THP-NMD & THP-Plus Annual Report 2019-2020, <https://www.jbaforyouth.org/2019-20-thp-annual-report/>

*Note: the JBAY Reports define an involuntary exit as “an exit based on program non-compliance.” This presentation and the corresponding advocacy guide uses the term “involuntary exit” more broadly to mean any exit that is not initiated by the nonminor dependent.

THP-Agency Program Responsibilities as Prevention Strategies

- **Interpersonal Conflict** → Program should teach youth skills around living with roommates, developing mentoring relationships with adults, gaining personal responsibility skills, etc.
- **Behavior-related violations of program rules** → Program should put rules in writing, and rules must not be capricious.
- **Youth not meeting program requirements** → County and program should ensure youth have the tools necessary to pursue TILCP goals or adjust the TILCP goals to address any issues impacting progress.



**A WRITTEN
NOTICE IS
ALWAYS
REQUIRED.**

THP-NMD Discharge/Removal Requirements

- State licensing rules for THP-NMD provide specific procedures that a **THP-NMD agency** must follow to exit a youth from the program.
- An NMD may not be discharged from the program without a **written notice** given **7 days prior to discharge**, with a copy sent to the county placing agency.
- The THP-NMD program must maintain a copy of discharge policies and procedures that the youth signed upon entry, as well as documentation of the NMD's discharge from the program.
- The County Placing Agency should attempt to stabilize the placement after a 7-day notice is issued

Exits for “Emergency Circumstances”

THP-NMD exits for “emergency circumstances” [without a 7-day notice] should be used very infrequently by county placing agencies.

Emergency Circumstances include, but are not limited to:

- Youth is arrested by law enforcement
- Health and safety of the NMD or others in the THP-NMD program are endangered
- Youth is removed for emergency medical or psychiatric care.

Advocacy Considerations:

- The interim licensing standard that allows this type of exit is permissive (“may”) NOT mandatory (“must”). Advocate against removal where the emergency circumstances do not interfere with program operation or the health and safety of other residents.
- The interim licensing standard allows the *county placing agency* to remove a NMD from the THP-NMD in the enumerated emergency circumstances, **but it does not allow a THP-NMD agency to discharge, remove, or demand removal on this basis.**

Reminder:

Discharge/removal from the THP-NMD *program* does not necessarily mean that a youth is required to leave the *physical housing unit*.

Advocacy Strategies

Advocacy Strategies

Loss of THP-NMD Funding and Services

- State Fair Hearings
- Community Care Licensing (CCL) Complaints

Loss of THP-NMD Housing

- Community Care Licensing (CCL) Complaints
- Landlord-Tenant Law
- Reasonable Accommodation

Loss of THP-NMD Funding & Services: State Fair Hearings

- As with all public social services programs administered by the CDSS, NMDs and anyone receiving foster care benefits on their behalf (like THP-NMD programs) are entitled to:
 1. **Written notice** of any change or termination of that social services program benefit. Verbal notice, though common, is insufficient.
 2. A **state fair hearing** to challenge the county's decision before an administrative law judge (ALJ).
- If there was no notice, contact the program to explain that the youth has a right to a written notice and no exit can occur without that notice

Advocacy Strategy: State Fair Hearings

Before requesting a State Fair Hearing:

- Review any written notice issued by the county related to the youth's eligibility for foster care funding (the notice may be sent to the THP-NMD agency, rather than the youth)
- Review the applicable statutes (including WIC § 11400 *et seq.*) and regulations (including MPP §§ 45-100 - 45-300) and ACL 22-16
- Consider reaching out to the county's foster care eligibility department, in writing, to ask them to rescind the notice, and explain the reasons why

Advocacy Strategy: State Fair Hearings

Requesting a State Fair Hearing:

- If the county does not rescind the notice and the youth maintains that the decision is incorrect, request a state fair hearing.
 - If the county provides adequate written notice, then the youth must request a hearing within 90 days of the date of the notice, unless the youth can show “good cause” for exceeding that timeline.
 - Request online: <https://www.cdss.ca.gov/hearing-requests> or by phone: (800) 743-8525
- Request payment be maintained pending the hearing

Advocacy Strategy: State Fair Hearings

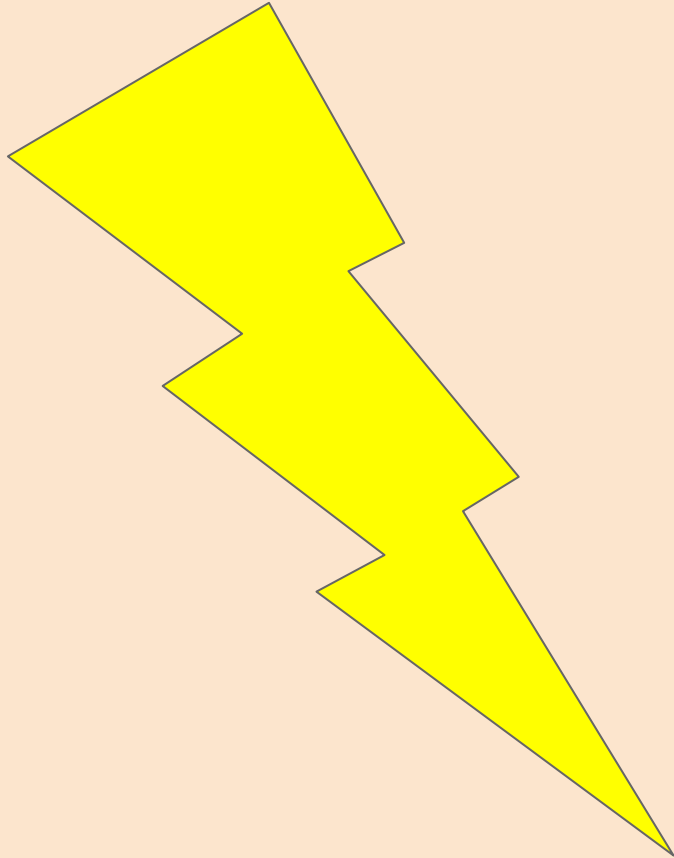
Prepare for a State Fair Hearing:

- Attempt to negotiate or resolve the case with the county representative. If you're able to negotiate a favorable outcome, make sure to get the agreement signed and in writing (oftentimes called a conditional withdrawal).
- If unable to resolve prior to a hearing, the county must provide its position statement at least 2 days in advance of the hearing. It's also best practice to provide your own position statement in advance of the hearing, though it isn't required.
- Prep for hearing with the youth.

Advocacy Strategy: State Fair Hearings

After the State Fair Hearing:

- If ALJ determines the youth is **eligible** for foster care benefits, they should be reinstated immediately and retroactive benefits should be issued
- If ALJ determines the youth is **ineligible** for foster care benefits, the youth should engage with the Child and Family Team (CFT) and the county placing agency to determine an appropriate placement and a way to restore eligibility
- Youth and advocate may consider filing a request for rehearing with the state fair hearings division (MPP § 22-065) or a writ challenging the ALJ's decision in Superior Court (Cal. Code Civ. Pro. § 1094.5)



REMEMBER!
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Loss of Funding and Services AND/OR Loss of Housing: Community Care Licensing Complaints

- Anyone can file a licensing complaint with the CDSS Community Care Licensing (CCL) Division if a THP-NMD agency has violated state laws and regulations.
- When CCL substantiates a violation, the investigator will issue the program a citation, and the program has a certain period of time to remedy the violation. The severity of the consequences will depend on both the nature of the violations as well as the licensing history of the provider.
- Youth and their advocates should avail themselves of the CCL complaint process in a wide range of circumstances. Repeat CCL violations may lead to more serious consequences for providers that are not meeting their obligations to youth.

Examples of Substantiated CCL Violations

- Condition of the housing unit left the youth without a safe, healthy, and comfortable home: Inoperative appliances, no prompt repairs, no alternative residence during major repairs, mold, insect or rodent infestation, no crib for parenting youth
- Inappropriately punitive conduct by program staff
- Violating a youth's personal rights by failing to change the youth's case manager after she reported that the case manager made her feel uncomfortable
- Unreasonable searches and/or failure to safeguard the personal items of program participants.
- Failure to provide adequate care and supervision
- Violations related to participants' cash resources
- Discharge for an improper reason or without written notice
- Failure to timely pay bills including rent and utilities.

Advocacy Strategy: Community Care Licensing Complaint

Prior to filing a CCL Complaint:

- Attempt to resolve the licensing violation informally and advocate for the NMD to remain in their housing unit pending the completion of this process
- Review provider's licensing history. This can be found both through the local Children's Residential Regional Office as well as online [here](#).
- If the THP-NMD provider agrees to resolve the violation, get this in writing and set a date to follow-up on any action items

***Remember: the youth is entitled to written notice of any impending discharge (see slide 24)

Advocacy Strategy: Community Care Licensing Complaint

Making a CCL Complaint:

- Contact the appropriate [Children's Residential Regional Office](#) to make a complaint.
- Cite all of the applicable laws and regulations (including the Foster Youth Bill of Rights (WIC § 16001.9), H&S Code § 1559.110, Title 22 regulations, and the AB 12 Interim Licensing Standards)
- Counsel the youth on the complaint process and help the youth collect as much evidence as possible
- Again, review licensing history for the provider

Advocacy Strategy: Community Care Licensing Complaint

Upon Exit:

- If the CCL complaint and investigation do not resolve the underlying issues and/or the youth is forced to exit the program, coordinate with the county placing agency to ensure that an appropriate alternative placement has been identified.
- **Remember, the county placing agency has a duty at all times to provide the nonminor dependent with a safe and appropriate placement.**

Loss of THP-NMD Housing: Landlord Tenant Law

- Nothing in California law explicitly prevents establishing a landlord-tenant relationship in a Transitional Housing Program.
- Therefore, in certain circumstances, NMDs in THP-NMD may have strong tenancy rights that would require THP-NMD agencies (or the property owners with whom they contract) to pursue a formal eviction in state court to remove the NMD from the housing unit. *Note: This is still an open question and it is not explicitly addressed in any current case law.*
- A THP-NMD provider may cosign a lease with a nonminor dependent, **but a nonminor shall not be the only one to sign a lease or rental agreement.** (H&S Code § 1559.110(e)).

Advocacy Strategy: Landlord Tenant Law

- If the youth received a 7-day written notice that the THP-NMD agency is terminating the youth from the THP-NMD *program*, consult with a housing attorney immediately. Even if the THP-NMD agency has the authority to end the youth's participation in the THP-NMD program, **LL/T protections may apply to the youth's separate possession of the housing unit.**
- **Regardless of whether the youth fits the definition of a tenant, they should not have to vacate their unit immediately upon receiving notice.**
- Help the youth gather any information that will be helpful when consulting with a housing attorney, including the program agreement and lease and any communications with program staff and the landlord

Loss of THP-NMD Housing: Federal and State Fair Housing Laws

- The Federal Fair Housing Act (FHA), California's Fair Employment and Housing Act (FEHA), the Unruh Act, and California Government Code Section 11135 prevent discrimination in housing, including most forms of THP-NMD housing.
- These laws protect certain groups of people, including groups based on race, color, national origin, religion, sex, familial status, and disability.
- Youth and their advocates can make a complaint with the [California Civil Rights Department](#) (formerly the Department of Fair Employment and Housing) at any time if the youth experiences discrimination in their THP-NMD program or housing.

Advocacy Strategy: Reasonable Accommodation Requests

- Fair housing law also contains disability-based protections that youth and advocates may use to prevent or defend against both rejections to admissions and involuntary exits from THP-NMD
- A NMD with a disability may be entitled to a reasonable accommodation at any time during their participation in THP-NMD, including upon admission or when facing an involuntary exit.
- The THP-NMD agency has a duty to engage in an “interactive process” with the person making the request before denying the accommodation.

Reminder!

An **“involuntary exit”** can encompass the loss of two distinct but overlapping components of THP-NMD:

- (1) the THP-NMD program (i.e. the supportive services and foster care funding), and
- (2) the youth’s possession of the housing unit that was secured by, but may not be owned by, the THP-NMD agency.

The loss of one component may not automatically result in the loss of the other.

Advocates need to establish which component(s) are at issue, and may need to employ multiple advocacy strategies simultaneously to preserve program eligibility and housing stability.

Small Group Hypos

- We'll break into 5 small groups to apply what we've just learned
 - Group 1: Extended Foster Care Eligibility (David)
 - Group 2: State Fair Hearings (Jizel)
 - Group 3: Community Care Licensing Complaints (Esmerelda)
 - Group 4: Landlord-Tenant Law (Chris) (Part I)
 - Group 5: Reasonable Accommodation Requests (Chris) (Part II)
- Each group will have 10 minutes to discuss their assigned hypo/advocacy strategy, then we'll come back to the main group to discuss. Remember: nothing that is discussed in breakout rooms is recorded by Zoom.

Extended Foster Care Eligibility - “DAVID”

David is 19 years old. When David was 17 years-old, the juvenile court made a foster care placement order, placing David in a group home. David remained in the group home placement until his 18th birthday, but he decided to exit extended foster care shortly after his 18th birthday and his juvenile court case closed. David has been couch surfing for the last year, and moving between two different counties. David just started a job working with his uncle but has not yet received his first paycheck. His best friend is in THP-NMD housing through extended foster care, and David wants to know if he is eligible for the same housing program.

Questions to consider:

- Is David eligible for THP-NMD Housing?
- What would he need to do to become eligible and how would you go about it?

State Fair Hearings - “JIZEL”

Jizel is 20 years old and living in Independence+ (I+) THP-NMD Housing. She has been in the program for 6 months and is attending her local community college. One day her I+ case manager contacts Jizel to let her know that she will need to leave the program and her housing by this weekend. Jizel asks the case manager about why she needs to leave the program, and the case manager informs her that the I+ program manager just said it was an “eligibility issue”, but couldn’t provide the case manager or Jizel with any more information. The case manager didn’t mention anything about the program receiving any written notices about eligibility and Jizel also did not receive any written notice.

Questions to Consider:

- What steps could you take to find out more about the “eligibility issue”?
- What steps would you need to take to request a state fair hearing?
- Can Jizel stay in the program and her housing during the state fair hearing process?

Community Care Licensing Complaints - “ESMERELDA”

Esmerelda has lived in Sunflower Housing THP-NMD program for a few months. When she moved into her apartment unit in the fall, she noticed that the oven was not working. She also noticed some black marks in the tub that looked like mold. She notified the THP-NMD’s property manager (PM) in writing about the issues when she first moved in, and they told her they would send a repair person. Esmerelda followed-up a few times by both email and phone, but no one ever came to look at the unit. Once winter started, she tried to turn on the heat, but it didn’t work. She also noticed that the black spots in the bathtub were getting worse. She called the PM by phone and left a voicemail message. The PM did not respond. Esmerelda wants to stay in her unit since it is close to her job, but she’s upset that the PM has not fixed the issues and she wants them repaired.

Questions to Consider:

- What actions should Esmerelda and her advocate take before/during/after making a CCL complaint?
- Can Esmerelda stay in the housing unit and program during the investigation?
- What can she do if the THP-NMD program retaliates against her for making a complaint?

Landlord-Tenant Law - “CHRIS” (Part I)

Chris is a 20 year old NMD. They live in a THP-NMD apartment about an hour drive away from their school. Their THP-NMD program, Vision Independence (VI), helped them find a one-bedroom apartment and co-signed the lease. VI requires them to meet with their case manager in-person 1x/week. Chris has a documented sleep disorder, making the hour long drive hard at night so they frequently stay overnight with a cousin when they finish school after dark for safety. Toward the end of the semester, they spent fewer nights at their apartment and missed several appointments with their case manager. Chris says that they called their case manager to reschedule most, but not all, of the appointments, and that when they called, they explained that they were worried about driving home because of their sleep disorder. After missing four appointments in a row, Chris received a 7-day written notice from VI that explained that they would need to leave their apartment due to persistent violation of VI program rules.

Questions to Consider:

- Is the 7-day written notice sufficient to require Chris to exit their *housing unit*?
- What else would be required to exit them from the housing?
- Are there any other advocacy strategies that you can think of that may help them stay in their housing and the program?

Reasonable Accommodation Requests - “CHRIS” (Part II)

Chris has a documented sleep disorder which impacts their ability to drive the one hour to and from their school program and THP-NMD housing unit and in turn, their ability to meet with the case manager as often as directed. They have discussed their sleep disorder with their county placement agency social worker and the sleep disorder has been documented in their TILCP. Chris has also told their THP-NMD case manager about their sleep disorder, but they were told that it was program policy that all weekly meetings be in-person at the THP-NMD agency offices near their housing unit. Chris wants to continue to participate in the VI program and stay in their housing unit, but they do not think that they will be able to meet with their THP-NMD case manager in-person as often as is required.

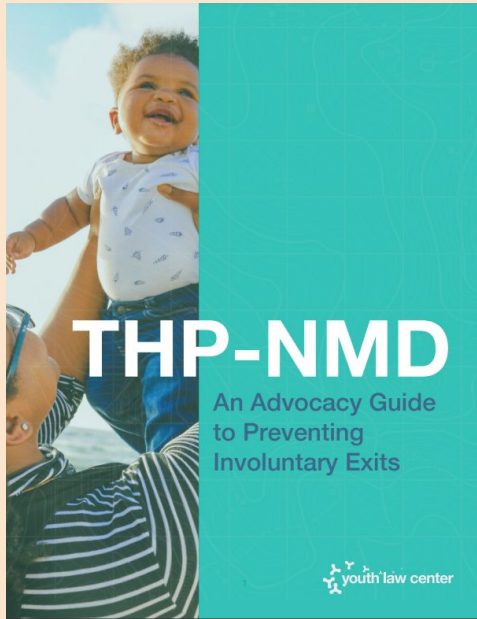
Questions to Consider?

- What kinds of reasonable accommodations could Chris request?
- If their reasonable accommodation request is denied, what can they do?

Small Group Hypos - Answers

- The “answers” to the hypothetical questions can be accessed [here](#)
 - Group 1: Extended Foster Care Eligibility (David)
 - Group 2: State Fair Hearings (Jizel)
 - Group 3: Community Care Licensing Complaints (Esmerelda)
 - Group 4: Landlord-Tenant Law (Chris) (Part I)
 - Group 5: Reasonable Accommodation Requests (Chris) (Part II)

Additional Resources



- [Preventing Involuntary Exits from THP-NMD Webinar Recording](#)
- [Glossary of Terms: A Supplement to Youth Law Center's Presentation: Preventing Involuntary Exits from THP-NMD](#)
- [JBAY, Youth in THP-NMD and THP-Plus: a 2020-2021 census](#)
- [JBAY, Statewide THP-NMD Provider Roster](#)
- [California Department of Social Services Regulations](#)
- [Transitional Housing Placement for Non-Minor Dependents \(THP-NMD\) A Fact Sheet Prepared by the Youth Law Center](#)

[Link to Full Advocacy Guide Here](#)

Questions?

Contact us: info@ylc.org

Website: ylc.org

