



THE FAMILY FIRST PREVENTION SERVICES ACT:
IMPLICATIONS FOR ADDRESSING YOUTH HOMELESSNESS



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The pathways between foster care and youth homelessness are well established. Multiple studies confirm that young people become homeless while in foster care in a variety of circumstances — after returning to their birth families, as the result of disrupted placements in adoptive and guardianship homes, and once they transition out of the child welfare system. Young people may also first experience homelessness along with their families, sometimes leading to a foster care placement or episodes of homelessness throughout their lives. Others may experience homelessness when they run away from a hostile family environment, a family foster care placement that fails to meet their needs, or an inappropriate congregate care setting. Some young people in foster care are forced to transition to adulthood without the ability to support themselves due to limited educational opportunities, multiple school changes, poor transition planning, and limited housing options.

For all these reasons, it has become increasingly clear to policymakers, advocates, and community leaders that the foster care experience is one of the many pipelines that contribute to homelessness for young people. In response, communities across the country are looking for new strategies, tools and multi-system partnerships to prevent youth homelessness and address its impact. To fully meet young people's needs, child welfare agencies are beginning to pay more attention to the conditions that lead young people to become homeless while involved with their systems, and runaway and homeless youth (RYH) providers are exploring new ways to access the full range of necessary services and funding sources to support young people and their families.

This paper explores how the Family First Prevention Services Act ("Family First") can be leveraged as one of the tools to address homelessness for youth and young adults involved in the foster care system. Family First, described in further detail below, offers important new options to prevent young people's entry into foster care and to challenge states to use congregate care only as a

last resort — a short-term intervention to meet young people's treatment needs. While the Family First Act was not designed to address youth homelessness, there are aspects of the new law that could help fund services for these young people, prevent some of its root causes, and provide a stronger foundation for collaboration between child welfare, runaway and homeless youth providers, and other youth-serving systems.

In describing both the promise and potential unintended consequences of Family First for young people in the child welfare system who also experience homelessness, the paper draws on one-on-one interviews with multiple stakeholders in the field, including youth homelessness providers, child welfare leaders, federal policymakers, researchers, and policy experts in both youth homelessness and child welfare. These insights also provide the foundation for a set of recommended next steps to ensure that Family First is used to maximize its impact on youth homelessness and to support ongoing efforts to promote meaningful collaboration across these two service and advocacy communities and beyond.



OVERVIEW

Family First has two primary goals: to prevent entry into foster care, and to limit the use of congregate care when there are no identified treatment needs.

In addition to these two overarching goals, there are a number of additional provisions that hold promise

for improving outcomes for youth in the child welfare system, including those experiencing or at risk of experiencing homelessness. Provisions that will help achieve these objectives are described more fully in the following table.

PROVISION	DESCRIPTION	IMPLICATIONS FOR YOUTH EXPERIENCING OR AT RISK OF HOMELESSNESS
<p>PREVENTION SERVICES</p>	<ul style="list-style-type: none"> ▶ Allows states to claim Title IV-E dollars previously limited primarily to support youth in foster care – for services to prevent the need for out-of-home placements ▶ Eligible populations include youth who are “candidates” for foster care, meaning they are at imminent risk of being removed from their families, including their parents and kinship caregivers ▶ Eligible prevention services include mental health, substance use treatment, and parenting skill-based education ▶ Services funded must meet certain evidentiary standards that are laid out in the law, and 50% of the prevention funds must be spent on the highest level of evidence (well-supported) ▶ The Family First Evidence-Based Clearinghouse is tasked with rating eligible prevention services and has produced a manual with criteria for the ratings. Services are being rated for eligibility on a rolling basis ▶ Title IV-E is the payor of last resort and cannot be used for services already funded through another federal funding stream ▶ States must submit a Family First Prevention Plan and are eligible for claiming for prevention services beginning October 2019 	<ul style="list-style-type: none"> ▶ Holds promise for reducing the foster care to homelessness pipeline by providing high-quality prevention services to keep children with their families. ▶ By defining youth experiencing homelessness and risk of homelessness as “candidates” for foster care in their state plans, states might be able to use prevention funding. However, RHY providers are concerned about the dearth of evidence-based and evidence-informed services for this population that might qualify for reimbursement. ▶ Prevention services can also potentially address some of the root causes of youth homelessness, such as substance use and mental health issues.

PROVISION	DESCRIPTION	IMPLICATIONS FOR YOUTH EXPERIENCING OR AT RISK OF HOMELESSNESS
<p>CONGREGATE CARE</p>	<ul style="list-style-type: none"> ▶ Family First responds to a widespread concern about the number of children placed in group care settings without a clinical diagnosis that warrants placement into this higher level of care ▶ Requires an independent assessment of the need for residential treatment ▶ Placements lasting longer than 14 days that do not meet a clinical need (i.e., shelter or group home) will no longer be eligible for Title IV-E federal funding unless they qualify as Qualified Residential Treatment Programs (QRTPs) ▶ States must comply with new standards for Qualified Residential Treatment Programs (QRTPs) in order for the placement to be eligible for Title IV-E. These standards include accreditation by a national accreditation body, availability of trauma-informed treatment approaches, access to after-care services, and other standards outlined in the law ▶ Residential treatment placements cannot last longer than one year, and courts must provide stronger oversight of the case to determine the appropriateness of a higher level of care ▶ This provision provides an exception for two categories of young people: those at risk of or experiencing sexual exploitation and pregnant and parenting youth in foster care ▶ Supervised independent living programs are not subject to the congregate care restrictions described above ▶ States must comply with this provision beginning October 1, 2021 	<ul style="list-style-type: none"> ▶ This provision may impact runaway and homeless youth shelters, some of which rely on Title IV-E funding for shelter placements. Questions remain about alternatives to shelter stays for youth who leave home, congregate care, family foster care or kinship placements. ▶ Some stakeholders are concerned that the exception for children at risk of sexual exploitation is too broad and may lead to inappropriate placement of youth into congregate care. ▶ There is concern that without adequate family reunification and support services or a robust pool of appropriate foster family homes, more young people might run away following their transition from group care. ▶ Child welfare systems and RHY providers can work together to ensure a full continuum of Supervised Independent Living Programs and ensure there are enough services to meet the demand.
<p>CHAFEE PROGRAM ELIGIBILITY EXTENSION</p>	<ul style="list-style-type: none"> ▶ Family First amends the Title IV-E Chafee program to allow services for youth up to age 23. The previous age limit was 21 	<ul style="list-style-type: none"> ▶ Continued support for young people up to age 23 and after they leave foster care could mean more time to secure stable housing and access to the range of supports needed for a successful transition to adulthood

FAMILY FIRST AND YOUTH HOMELESSNESS: INSIGHTS FROM THE FIELD

To better understand the opportunities that Family First presents for youth experiencing homelessness, we conducted more than 25 interviews with youth service providers, child welfare leaders, researchers, and policy experts (collectively “youth homelessness and child welfare experts”). **These interviews revealed that many in the child welfare and RHY fields are excited about the opportunity to leverage Family First to prevent entry into foster care and to reduce the use of congregate care. At the same time, many interviewees expressed concern about the law’s possible unintended consequences for runaway and homeless youth and cautioned that its impact will depend on the ability of multiple youth-serving systems to collaborate in achieving their collective goals.**

Because a large proportion of youth experiencing homelessness report previous child welfare involvement, youth homelessness experts generally viewed child welfare system improvements as an essential prerequisite to reductions in youth homelessness. They also recognized the possibility that changes in how foster care placements are funded could produce less-than-optimal outcomes for homeless and runaway youth in the short-term and offered suggestions for how communities and policymakers could lower the risks to this population.

Given the siloed nature of funding streams and service communities, the interviews also revealed that many service providers focused on addressing youth homelessness had very little familiarity with Family First and its implications for the populations they serve. Even providers and other experts who were generally knowledgeable about the law raised basic questions about how the law will apply to specific families and circumstances pending further federal guidance and development of state implementation plans.

Additional insights from interviews with the field include the following:

- ▶ Youth homelessness providers are already providing services relevant to many of the issues addressed by Family First (e.g., helping families resolve conflict, helping youth transition successfully to adulthood, etc.). Because they often serve youth who were previously involved with child welfare systems, they can provide valuable expertise in states’ Family First implementation efforts.
- ▶ Child welfare systems and youth homelessness service providers have very different orientations and do not always have a history of close and positive collaboration in many communities, making partnerships around Family First both challenging and potentially transformative.
- ▶ Given the law’s narrow definition of evidence-based prevention services, additional action and resources will be needed from states to meet the needs of children and families at risk of foster care placement and homelessness. Many interviewees expressed hope that forthcoming federal guidance would interpret the law as broadly as possible in order to maximize its potential impact.
- ▶ Although Family First does not specifically focus on youth homelessness, several aspects of the law could address common pathways to youth homelessness, including family conflict, group care placements that fail to meet youth’s needs, and lack of transition planning for older youth in foster care.
- ▶ Interviewees were interested in considering a strategy to explicitly include runaway and homeless youth as “candidates” for foster care in state prevention plans but were equally concerned about unnecessary foster care system involvement and supervision in order to access critical funding.
- ▶ Although interviewees recognized the many positive opportunities that Family First presents, many service providers also fear that reducing congregate care funding would lead to an increasing number of young people needing to access already scarce youth homelessness beds and services.

- ▶ There was also a strong feeling that the law and current agency guidance does not adequately leverage some key opportunities and a hope that those could be addressed through future federal action or by states and communities themselves. This was particularly true around prevention services (e.g., interviewees wanted prevention supports to start further upstream and saw opportunities for a broader range of services to be provided to “candidates for foster care”).
- ▶ Family First implementation planning was also seen as an opportunity to identify current gaps in services, whether or not Family First funding can be used to fill those gaps.

Finally, the interviews also pointed out that, because the law addresses so many different aspects of the child welfare system, some provisions may be more or less relevant to youth who experience or who are at risk of experiencing homelessness than others (e.g., older adolescents might benefit from the Chafee expansion while youth who run away from foster care might benefit more from better legal representation). This underscores the need for further education and awareness-raising among youth homelessness providers, advocates, and local policymakers.

PREVENTION AND KINSHIP SUPPORT PROVISIONS

As noted above, interviewees were very supportive of Family First’s intentions to fund prevention services **before** foster care placement becomes necessary and to reduce the inappropriate use of congregate care. Providers and other experts are also generally optimistic about the opportunity for youth and families to access in-home therapeutic services and kinship supports.

Specific Evidence Based Programs mentioned by providers included: Dialectical Behavioral Therapy (DBT), Sanctuary Model/Trauma Informed Care, Functional Family Therapy (FFT), Motivational



Interviewing, YV (Youth Villages) LifeSet, HomeBuilders, and Critical Time Intervention (CTI).

Providers also talked about the importance of services being trauma-informed, using a positive youth development lens, and including ongoing case management.

Numerous interviewees pointed to opportunities for improved partnerships between child welfare agencies and youth homelessness providers to deliver effective prevention services and expressed hope that Family

First could be a catalyst for improved coordination between these siloed systems. Some experts also noted that the lack of income requirements to access prevention services may also make them more available to youth accessing homelessness services.

However, providers also expressed concerns that if more children are being kept at home with their families and expanded prevention services are not able to meet their needs, this could lead to more youth running away or being kicked out of their homes, thereby increasing the number of young people who need already scarce youth homelessness program beds and services. Some

“While I think this opens the door [to prevention services], states still need to choose to walk through it.”

- YOUTH HOMELESSNESS EXPERT

interviewees also felt that the stringent requirements in Family First (and subsequent agency implementation guidance) were likely to leave out many good programs that have research behind them but still fail to meet high evidentiary standards backed by randomized studies and related requirements. One interviewee, for example, explained that evidence-based programs “don’t necessarily meet community needs if they have to be [implemented] rigidly,” while others pointed to the ethical concerns inherent in using a randomized approach which requires limiting access to promising

programs to only some of the youth and families who need them. In addition, many interviewees also felt that the limitations around who could receive preventative services funded through Title IV-E were a missed opportunity for primary prevention/earlier intervention and acknowledged that funding limitations would require states to make “hard choices” in prioritizing the provision of services.

In its Family First implementation efforts, the Department of Health and Human Services has made it clear that it will not be providing a federal definition of “candidates” for foster care, essentially leaving it to the state to include its own specific candidacy definitions as part of its prevention plan. This raises an important question about whether states could categorically define runaway or homeless youth or those youth at risk of homelessness as “candidates” for foster care. Several experts interviewed were willing to consider the possibility that states could include homeless youth or youth at risk of homelessness in their candidacy definitions to expand funding for applicable prevention services. Generally, however, both providers and experts cautioned that states should ensure candidacy definitions are not overly broad in order to avoid “net-widening” (i.e. “screening-in” youth and families in order to draw down prevention funding and thereby pushing them more deeply into the child welfare system.¹) This unintended consequence is particularly relevant for economically disadvantaged families, families of color or immigrant families, who already disproportionately experience child welfare involvement. As of the date of this publication, none of the states that have submitted prevention plans have included young people experiencing homelessness or at risk of experiencing homelessness in its candidacy definitions.

¹ Although it is hard to determine the likelihood of net-widening before widespread implementation of Family First even begins, two examples of scenarios that could occur would be if a family is reported or screened in when they otherwise would not have because someone thinks they will get services instead of foster care; or a family is receiving in-home services, and the provider observes circumstances in the home that could lead to unnecessary foster placements for the child without providing the supports for the whole family.

BETTER COORDINATION FOR BETTER OUTCOMES

▶ ALTERNATIVE RESPONSE MODEL

In Nashville, the Metro Homeless Impact Division is working with community partners to implement a Federal Youth Homeless Demonstration Program (YHDP) to expand a coordinated approach to prevent and end youth homelessness. Together with the Oasis Center, a local provider to runaway and homeless youth, the local child welfare and housing agencies, the courts and others, the collaborative has used the demonstration grant to build an Alternative Response Model for unaccompanied minors as an alternative to juvenile detention, foster care or shelter placements. Key elements of Alternative Response include a single point of entry for young people experiencing housing instability that can take referrals from all systems; a common assessment approach to determine the best intervention and next steps for the young person; case management and crisis resolution services; host homes designed to shelter young people when they need an immediate place to stay; and case conferencing to help coordinate access to needed services. In addition to promoting positive outcomes for young people and their families, the collaborative also works to ensure that each participating system's priorities are also addressed.

▶ PROJECT MINOR CONNECT

As in so many other communities, the child welfare and runaway and homeless youth service providers in Hennepin County, Minnesota (Minneapolis) each have different approaches to serving young people who are experiencing homelessness or who are at risk of experiencing homelessness. To address these needs, the Minnesota Department of Human Services, Hennepin County, YMCA, YouthLink and the Youth Law Project collaborated to create Project Minor Connect, a pilot program designed to assist youth ages 15-17 who are at risk of experiencing, experiencing homelessness or who have housing instability. The project provides an individual needs assessment, family group decision making, youth in transition conferences, connections to housing options and family reunification supports, when appropriate. The only time young people are referred to the child welfare agency is when they already have an open foster care case. "We're trying to provide a more holistic response by coordinating county and community resources," says Paul Minehart, the program's coordinator, "just referring them to child welfare isn't necessarily what they need to achieve stability."

▶ KING COUNTY'S YOUTH ENGAGEMENT TEAM

In Seattle, the Youth Engagement Team is a promising program that is helping homeless youth navigate their involvement with multiple government systems including RHY providers, child welfare and juvenile justice. Coordinated by All Home, King County's homelessness coordinating body, the Youth Engagement Team is tackling some of the root causes of youth homelessness, including conflict at home, a history of family homelessness, and legal barriers to stable housing. The holistic support team is comprised of a mental health counselor, housing navigator and lawyer who work with the young person over a six-month period to locate and secure stable housing and to coordinate involvement with other systems so that young people are not needlessly caught among them. Since the program does not supply housing, Youth Engagement Leaders also seek a variety of alternative solutions to house minors, including placements with family friends or working with the child welfare agency to find foster care placements, where appropriate, for the young person.

CONGREGATE CARE/QRTP PROVISIONS

Among all the provisions in Family First, the Act's restrictions on the use of federal funding to pay for group care may have the most significant impact on youth at risk of or experiencing homelessness. Interviewees were quick to recognize the possibility that fewer youth experiencing congregate care (or poor-quality congregate care) could translate to fewer youth running away from care and/or experiencing homelessness. Some providers and experts also hoped that the Qualified Residential Treatment Programs (QRTP) requirements around family and aftercare support could help address family homelessness and prevent youth homelessness in the future. Several other QRTP requirements, including those tied to aftercare and transition planning, were also mentioned as potentially relevant to concerns about later homelessness.

Interviewees also noted that the independent living congregate care exception and runaway and homeless youth programs could intersect, and that the "supervision" component could be an opportunity for connection to further services and supports. Some interviewees also mentioned that "host homes," a housing option used in some communities without traditional foster care licensing requirements, could be an effective alternative to congregate care settings and traditional foster homes.

We also asked interviewees to consider whether existing runaway and homeless youth programs could or would become QRTPs. Respondents noted that many programs already meet some of the QRTP requirements (e.g., using clinical support, engaging families, etc). However, even programs that meet most requirements may have concerns about applying them in every case (e.g., engaging family in specific circumstances that could be harmful to the young person), and the accreditation process could be too difficult or expensive. One interviewee explained, "[The accreditation process] is very intensive, and small, rural programs will have a difficult time. This will lead to fewer qualified programs and will likely have a particular impact on youth of color and

LGBTQ youth who already feel like there are few safe resources and programs."

Respondents also recognized that each youth has their own preferences about their living situations, and systems should try to respect those choices as much as possible. For example, one interviewee pointed out that "youth who have been homeless for a while can really struggle with succeeding in a traditional foster home because they are not necessarily looking for a 'new family'; they are looking for the support and opportunity to care for themselves. Newly homeless youth are likely to be more open to a family setting." Another said that "we hear from a lot of youth placed in residential settings who are not getting access to the family-based support they are craving."

"Young people should be able to receive the supports they need for as long as necessary to move into self-sufficiency."

-YOUTH HOMELESSNESS PROVIDER

Many youth homelessness experts also pointed out that as federal funding for group settings decreases, states and communities will need to find other resources for the limited situations in which youth may need longer stays in non-family environments. Youth homelessness providers report that the current 21 days of funding available for RHY services is often insufficient for certain youth, with one interviewee explaining that "young people should be able to receive what they need for as long as necessary to move into self-sufficiency." Under the Runaway and Homeless Youth Act, Basic Center Programs have a 21 day "length of stay" funding limit on their ability to provide crisis and respite housing, intensive services, strengths-

based family intervention, when safe and appropriate, to minor aged youth at risk of or experiencing homelessness. Another provider explained that their shelter program provides intensive reunification services for youth and has very high reunification rates, saying “for the vast majority of families, a return home happens within two weeks, but some kids need more time.”

YOUTH VOICE, CHAFEE EXPANSION AND SPECIAL POPULATIONS

In addition to respecting youth’s preferences in individual placements, interviewees spoke of the importance of youth voice in Family First-related policy development and implementation. They also emphasized that youth should be engaged in oversight to ensure QRTP quality and in planning for the development of effective prevention services. Several interviewees also noted Family First’s focus on certain populations, including pregnant and parenting youth, as providing opportunities for at least some youth experiencing or at risk for homelessness. The Act’s focus on services related to the Commercial Sexual Exploitation of Children (CSEC) was also discussed, as many runaway and homeless youth experience trafficking. Providers and other youth homelessness experts wanted to see CSEC-focused policy guidance and programming recognize the common pathways between homelessness and human trafficking, without being overly broad (e.g., categorizing all youth experiencing homelessness or involved in child welfare as “at risk” of CSEC); others are concerned that the CSEC exception might be used as an “excuse” to keep young people in group care settings too long, given that all young people in group care could be broadly considered at risk of being commercially trafficked.

Some interviewees also cautioned that interventions and other responses supported by Family First needed to go beyond just ensuring that they are “appropriate for foster youth” to address significant differences in needs (e.g., for youth who may be experiencing family pushout due to their sexual orientation or gender identity). Interviewees

also noted that in addition to youth experiencing or at risk for homelessness, Family First could have significant impact on youth involved in the juvenile justice system because youth previously placed in child welfare group homes could end up in juvenile justice facilities as fewer group homes are available and funding for child welfare-based placements becomes more limited.

“Any policy needs to have youth voice and impacted populations front and center.”

—NATIONAL YOUTH POLICY EXPERT

Both providers and experts discussed the Chafee provisions of Family First as being particularly relevant to youth homelessness prevention and services, suggesting that:

- ▶ The engagement with youth to older ages (through extension of Chafee services) has the potential to support youth in their transition to adulthood and prevent homelessness.
- ▶ The Chafee expansion may allow for services to young adults who don’t qualify for other programs/funding (e.g., young people who have not been homeless long enough to access permanent supportive housing, or who have mental health challenges that keep them out of many programs).
- ▶ The Chafee ETV expansion could potentially lead to more skill-development opportunities for youth, leading to greater opportunities for youth to achieve and maintain self-sufficiency.

Some interviewees also noted the extension of time available for reunification services as being helpful for youth experiencing or at risk for homelessness.

PREVENTING HOMELESSNESS FOR YOUNG PEOPLE INVOLVED IN CHILD WELFARE: YOUTH PERSPECTIVES

“More services aimed at preventing foster care or helping foster youth transition into adulthood could help youth avoid homelessness in several ways. Foster youth lack many life skills that would normally assist them with functioning alone as an adult. Resources on and awareness of programs that can assist individuals are not “clear as day” which means youth may not always be aware of these programs.

Youth need key components focusing on a development plan while obtaining skills on employment, education, housing and more in order for them to progress. Programs to assist foster youth with transitioning into adulthood are much needed and would also make a difference in youth homelessness.”

—AJA, NATIONAL YOUTH ADVISORY COMMITTEE, NN4Y

“The child welfare system can be improved by having ongoing check ins with clients. Updating youth on services they qualify for before they age out could help us not become homeless. They can also have classes on how to live independently after you age out of the system.”

—SHARDAY, NATIONAL YOUTH ADVISORY COMMITTEE, NN4Y



RECOMMENDATIONS

Given all of the insights and information shared above, it is essential that youth homelessness service providers be part of implementation planning for Family First in all states. Additional recommendations developed based on expert interviews include:

- ▶ State child welfare agencies should invite youth homelessness representatives to serve on Family First implementation workgroups, particularly on subcommittees focused on older youth, including transition/Chafee services, prevention, and congregate care.
 - ▶ Local youth homelessness providers across each state should work in coalition to share their expertise and concerns with state child welfare agencies, as Family First implementation planning will largely be driven at the state level.
 - ▶ Youth homelessness providers should increase their efforts to educate child welfare agencies, policymakers, and others about the services they offer and how they are currently funded, so that this service array is integrated into Family First implementation discussions.
 - ▶ Child welfare and youth homelessness systems should partner to include the experiences of adolescents in their communities and to identify common pathways to homelessness, gaps in services, and potential opportunities to avoid system involvement.
 - ▶ State and federal policymakers should offer financial incentives, technical assistance, and other support to encourage child welfare and runaway and homeless youth agencies to work together, braid available funding streams and address young people's full range of needs.
- State child welfare agencies and homelessness providers should collaborate to develop Family First implementation strategies to ensure that:
- ▶ Changes made under Family First equitably benefit and avoid unintended consequences for youth experiencing homelessness, youth who are LGBTQ, youth of color, and youth with developmental disabilities.
 - ▶ As placement options become more limited, youth should not be placed far away from their homes and families, limiting their access to support systems and making it harder to repair family relationships, if appropriate.
 - ▶ Youth have a role in shaping programming and policy and are viewed as experts and key decision makers in their own lives.
- As policymakers, child welfare agencies, and other partners implement Family First, they should take steps to ensure a full array of needed services is available for child welfare-involved youth and families:
- ▶ State agencies should work with youth homelessness providers to ensure that the services they offer and any useful service expansions can continue to be federally funded (e.g., by making sure that appropriate transitional housing meets independent living requirements or that transition services can be funded through Chafee).

- ▶ States and the federal government should support local jurisdictions in preserving and expanding their safety net programs (including shelters and other emergency housing options) to ensure that older youth do not “slip through the cracks” as the first few years of Family First implementation may be a period of difficult transitions for youth- and family-serving systems.
- ▶ Stakeholders should focus on adolescents when developing prevention plans and identifying possible services to offer to families. They should also support QRTPs and hold them accountable in achieving high quality care and creating an environment that supports youth and in which supports and specialized services are targeted to the circumstances that led to the residential placement.
- ▶ States and the federal government should invest in research to identify and build the evidence base for effective programs, with a focus on programs for youth of color, transgender youth, and tribal youth to address the current gaps in appropriate services for these young people.

Consistent with Family First’s focus on using evidence to drive action, states and other stakeholders must use data to ensure that any changes made under Family First are truly achieving their goals and course correct as needed:

- ▶ States (along with independent child advocates and researchers) should collect, analyze, and address data identifying potential impacts on youth homelessness programs and youth and families experiencing homelessness as a result of Family First.

Direct service professionals in both the child welfare and youth homelessness fields have an important role to play in all of the above recommendations and are also critical in ensuring that youth understand the full range of options and the services available to them:

- ▶ Providers should connect eligible youth to Chafee and other services, ensuring that eligible youth know what services they can receive.
- ▶ Service providers delivering services, including those funded by Chafee, must focus on meeting youth’s **individualized** needs.

The federal government can also act on the insights and recommendations shared by homelessness professionals by:

- ▶ Addressing primary prevention more broadly in the development of future legislation or funding streams and recognizing Family First’s stated goals by interpreting its language around prevention services as broadly as possible in future federal guidance to allow as many children and families as possible to benefit.



- ▶ Ensuring that interventions that work well for youth who have run away or experienced homelessness are included in the Clearinghouse and that investments are made to support research on programs for this population.
- ▶ Increasing funding for states that choose to expand Chafee as allowed by Family First and considering how Chafee could be strengthened more broadly through future legislative or agency action.

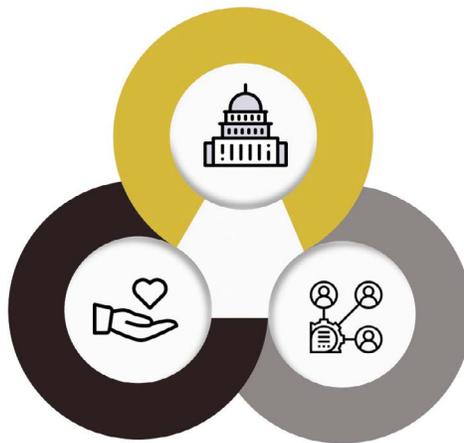
TAKING ACTION FOR YOUTH AND FAMILIES

STRATEGIES FOR EFFECTIVE FAMILY FIRST IMPLEMENTATION

What can key stakeholders do to support youth experiencing or at risk of experiencing homelessness?

CHILD WELFARE AND YOUTH HOMELESSNESS AGENCIES AND PROVIDERS

- ▶ Ensure that Family First implementation and related decisions effectively engage child welfare agencies, youth homelessness agencies and other relevant system leaders
- ▶ In implementing Family First, identify and avoid unintended consequences for traditionally underserved populations, including youth of color, LGBTQ youth, etc.
- ▶ Work to identify and fill gaps to ensure the full range of accessible and needed services for youth and families across systems and service providers



OTHER KEY STAKEHOLDERS

- ▶ Youth and families with lived experience must have a central and supported role in Family First implementation discussions and other efforts to improve service delivery and coordination across systems and service providers
- ▶ Juvenile justice, health care, family income, workforce supports and other systems must also play a critical role in Family First implementation and in improving systems coordination for young people experiencing or at risk of experiencing homelessness

FEDERAL AND STATE POLICY MAKERS

- ▶ Provide targeted financial incentives, technical assistance and other needed resources to encourage child welfare, youth homelessness and other systems to coordinate services and braid funding to better serve youth and families
- ▶ Invest in research to build a strong evidence base of effective and proven interventions to serve youth experiencing or at risk of experiencing homelessness
- ▶ Collect and analyze data and identify and address data gaps to better serve youth experiencing or at risk of experiencing homelessness

RECOMMENDATIONS FOR BROADER COLLABORATION BETWEEN CHILD WELFARE AND RHY PROVIDERS

Interviews with stakeholders confirmed that Family First provisions are one promising tool to help address the foster care to homelessness pipeline by helping young people avoid foster care involvement through the provision of high quality prevention services and supports for families and by ensuring that group care placements truly address young people's needs. The interviews also confirmed that runaway and homeless youth providers have specialized knowledge and skills from which child welfare agencies can draw to ensure services and supports are youth driven and family-centered.

Additionally, the interviews revealed broader opportunities for child welfare systems and runaway and homeless youth providers to work more collaboratively to address the foster care to homelessness challenge. Several interviewees noted that collaborative efforts must address the tension between these two systems, which can often get in the way of more productive working relationships on behalf of young people. These tensions are driven by RHY provider assumptions that "child welfare doesn't care about teens," and that their systems are better equipped to deal with the needs of younger children. On the child welfare side, there is a general lack of knowledge and appreciation for how RHY providers are working to address the comprehensive needs of young people and their families, and their unique expertise in working with runaway youth and unaccompanied minors.

Actions that could lead to greater collaboration between the systems include:

Implementation of policy changes that could lead to a stronger safety net to prevent youth homelessness:

- ▶ For states that extend foster care to age 21, allow youth who have "opted out" of child welfare

involvement when they turn 18 the option to opt back in until they turn 21

- ▶ Engage and contract with RHY providers to assist in engaging young people in extended foster care, transition planning, and other available life skills services
- ▶ Require closer alignment between child welfare systems and other youth-serving organizations around individualized transition planning specifically designed to meet the needs of young people, beginning at age 14
- ▶ Institutionalize a stronger focus in transition planning on housing stability and ensuring the transition plan presents a range of housing options, including multiple backup plans for if circumstances change unexpectedly
- ▶ Require a child welfare commissioner or director to sign off on any transition plan that results in a young person being released from agency custody into homelessness.

Developing stronger practice models to address the holistic needs of young people and their families:

- ▶ Draw on the experience of systems that coordinate responses at the front end of the system.
- ▶ Ensure child welfare and RHY providers participate in each other's interagency workgroups designed to more holistically meet the needs of young people.
- ▶ Institute transition planning models that start earlier, address the comprehensive needs of young people and are individualized to meet their needs.
- ▶ Create stronger safety nets across the developmental spectrum, not just at age 18 or 21. This includes aligning age cut-offs at age 23 or 26 with the science of adolescent brain development.
- ▶ Ensure aftercare is available for adolescents who return home for a supportive transition and ensure that youth who have runaway can return home or transition back to their placements without punishment or shame.

Implementation of funding models to prevent youth homelessness:

- ▶ Explore possibilities that exist for effective public/private partnerships (e.g., pay for success, etc.).
- ▶ Incentivize blending of federal and state funding streams to break down silos and encourage stronger collaboration to meet individualized needs of young people and their families. These incentives should be available to both public and private sector systems so funding can be braided at the programmatic level.
- ▶ Engage private foundations in support for sustainable collaboration models.

Ensure that prevention efforts also include efforts to prevent family homelessness:

- ▶ Given that family homelessness is still a primary driver of children entering into foster care, ensure prevention efforts are not just inclusive of services, but also funding for rental subsidies, deposits on apartments, flexible funding to help parents get and keep jobs, etc.



CONCLUSION

As one of the most significant bipartisan child welfare reform efforts in the past two decades, The Family First Prevention and Services Act has tremendous potential to help child welfare systems improve outcomes for children and families, including those who are experiencing or at risk of experiencing homelessness. To ensure optimal implementation efforts, however, child welfare systems and RHY providers will have to continue their ongoing efforts to work more collaboratively. This includes exploring new strategies to meet the needs of young people more effectively, navigating the different and sometimes conflicting philosophies that drive their systems, and identifying those service and funding gaps that still

need to be addressed by policy and practice. While the new law is an important step forward, the real challenge will continue to be finding common ground among the myriad of service systems that touch the lives of children and families throughout their lifespans while crafting policies that recognize their complex interplay and individual priorities. Most important, any efforts to better align and coordinate service systems must be guided by the lived experiences of young people and families who access these supports on the challenging road to stability and well-being.

This document is also available electronically at www.nn4youth.org/learn/resources or at www.childfocuspartners.com/tools-publications.

