

**RESPONSE TO THE *NORMAN* MONITORS'
STATEWIDE REVIEW OF THE HOUSING ADVOCACY PROGRAMS**

The Department of Children and Family Services (DCFS) respectfully submits this response to the monitors' Statewide Review of the Housing Advocacy Programs. DCFS appreciates the monitors' thorough review of the Housing Advocacy Program (HAP). DCFS also appreciates the recommendations made in the report. Responses to these recommendations are found at the end of this report. This report also contains responses to the findings that were discussed in the monitor's report.

DCFS agrees with the monitors' overall assessment that HAP is "a state of the art program addressing the needs of child welfare families." DCFS is committed to the concept that children who are not in danger should not be removed or kept from their families. Therefore, we are encouraged by the monitors' assessment that HAP has stabilized families thereby allowing children to stay with their families, or be returned home early, which assumes significant foster care savings.

While some *Norman* certified families need only cash assistance to obtain permanent housing, others require the assistance of experienced housing advocates. DCFS created HAP to assist families who need such assistance. DCFS believes that providing effective housing assistance includes developing a housing plan with the family, working together to implement the plan, assisting the family in applying for any housing subsidies or other benefits for which they are eligible and following up with the family after placement to ensure that the family remains stable. The HAP agencies continue to demonstrate their commitment to this philosophy.

DCFS agrees that the HAP caseworkers have competently served families that have been referred to their program. This assertion is proven by the fact that 70% of the families referred to HAP were placed in housing in 1993 and 81% in 1994. We are therefore heartened by the monitors' findings that there has been a dramatic increase in the number of families that have been referred to the HAP agencies over the past two years.

The monitors report that DCFS has addressed and corrected many of the barriers that have in the past impeded the ability of the HAP agencies to effectively serve families. However the monitors also state that there is room for improvement. The monitors report that although the numbers of referrals to the HAP agencies have significantly increased over the past two years, some DCFS offices continue to under utilize HAP. The monitors are also disturbed by the lack of accurate data from DCFS. Finally, the monitors continue to state the problem of the depletion of cash assistance and the difficulty to increase contracts of the agencies that have reached capacity.

DCFS agrees that HAP can improve. DCFS has already begun to address the concerns raised in the report. A Housing Specialist was hired to work with the HAP agencies. In

addition, DCFS is in the process of developing a new computerized information system to record information on HAP. Finally, we will authorize casework supervisors to certify families into the *Norman* class and approve cash assistance. This report outlines how these new developments will address the findings that were discussed in the monitor's report. This report also contains responses to the specific recommendations made at the end of the monitors' report.

Housing Specialist

On June 19, 1995, DCFS hired John Cheney-Egan to assume the Housing Specialist position. John Cheney-Egan has assisted homeless families and individuals obtain housing for six years. He is also familiar with housing subsidy programs that can serve *Norman* families.

Mr. Cheney-Egan has assumed the responsibility of monitoring all HAP contracts and conducting reviews of HAP. The Housing Specialist has already begun to meet with HAP caseworkers and Norman Liaisons. He will consult with HAP agencies regularly and provide service discussed below to assist HAP agencies serve *Norman* families.

Computerized Information System

DCFS is currently waiting for a decision from Paula Matea from the State's Information Systems Department regarding setting up a computerized information system. This system would be very similar to the NOMAD system that had been discussed with the monitors at previous meetings. This system would allow DCFS to monitor the amount of cash assistance that each HAP agency has in their budget.

Authorizing Regional Supervisors to Certify *Norman* Families

Partially in response to the monitors' recommendation and partially due to the Director's policy to give greater responsibility to the casework supervisors, DCFS will authorize supervisors at regional offices to certify *Norman* families and approve up to \$800 for cash assistance. We are hoping that this policy will take effect on August 1, 1995. This will allow us to serve more *Norman* families and expedite the receipt of cash assistance. DCFS is currently scheduling trainings for these supervisors. The Office of Litigation Management (OLM) met with Norman Liaisons on June 22, 1995 to prepare them for these trainings. In addition to familiarizing DCFS staff on the *Norman Consent Decree*, these trainings will include how to utilize the HAP agencies and the cash assistance program.

RESPONSES TO FINDINGS DISCUSSED IN THE MONITOR'S REPORT

Relationship Between DCFS Staff and HAP Agencies

While most HAP agencies reported to the monitors that their relationships with the Norman Liaisons were either good or excellent,¹ some HAP agencies report that they would like

¹According to the monitors report, most agencies evaluated their relationship with their Norman Liaison positively, with 56% identifying it as excellent. The majority of HAP agencies

to have a better relationship with their liaison. To develop better relationships, DCFS will encourage Norman Liaisons to meet with employees of the HAP agencies. HAP agencies in Cook County will be invited to attend the trainings for DCFS supervisors. Norman Liaisons from Cook County DCP will be encouraged to attend Cook County HAP meetings. OLM will meet with John Goad, Administer of Protective Services, to ask him to require that a Norman Liaison from DCP attend Cook County HAP meetings.

While the number of families referred to HAP has dramatically increased since 1993,² the monitors report that two area offices continue to under utilize HAP. The Housing Specialist will meet with DCFS supervisors and Norman Liaisons to educate them on the benefits of HAP and encourage them to utilize the program. The decision to authorize casework supervisors to certify *Norman* families and approve cash assistance payments will decrease the importance of the relationship between the HAP agencies and the individual Norman Liaison. The regional supervisors will be trained on the *Norman Consent Decree*. The supervisors will receive information about the HAP agencies and will be encouraged to refer appropriate families for assistance. We believe that this action will increase the number of families referred to the HAP agencies.

HAP agencies reported to the monitors that a number of new workers and supervisors are not properly trained and versed on the *Norman Consent Decree*. The HAP agencies report that a number of families are referred incorrectly. In addition to training supervisors, DCFS will review the CORE training to determine what changes need to be made to ensure that workers throughout DCFS are using the program appropriately.

The monitors report that in many parts of the state, a family has to be literally "on the streets" before a DCP worker will indicate the report and that the DCP worker will often unfound the report if the family enters a shelter. This problem should be resolved since intact families no longer need to be called into the hotline. DCFS will make sure that upcoming trainings include how to deal with this issue.

DCFS agrees that the referral form needs to contain all the information that the HAP agencies require to begin to serve families. HAP agencies have reported that the referral forms often lack important information which causes delays in the placement of families into housing. The Housing Specialist will meet with the Norman Liaisons and the HAP agencies to determine what additional information should be included on the referral form. DCFS will develop a new referral form that will be used throughout the state by December 31, 1995.

also evaluated their relationship with the caseworkers positively.

²The monitors reported that 254 families were referred to HAP in fiscal year 1993. The number of families referred increased to 355 in fiscal year 1994 and 164 in the first quarter of fiscal year 1995.

Areas Not Served by HAP

DCFS is committed to providing housing services to *Norman* families throughout the State.³ In some areas of the state, DCFS has contracted with private Homemakers Services to assist families find housing. Some *Norman* families have been successfully placed in housing by these programs. In addition to providing housing services, these programs offer other services such as budgeting and parenting training. DCFS does not believe that services should be duplicated if the families are being served adequately.

The Housing Specialist will meet with the Norman Liaisons and the previous HAP agencies from the regional offices in areas of the state that do not have a HAP contract. DCFS will determine the need for a HAP agency in those regions and report back to the monitors by December 31, 1995. If it is determined that families would benefit from receiving services from a HAP agency, the Housing Specialist will work with the Norman Liaisons in the area to locate an appropriate agency to serve that area.

Cash Assistance

DCFS agrees that cash assistance must be delivered quickly to ensure that families are placed in appropriate housing. HAP agencies have told DCFS that they are usually able to receive cash assistance in a timely manner. However, at times requests for assistance have been late. Occasionally this occurs because the HAP agency is unable to reach the Norman Liaison. This should occur far less frequently once the regional supervisors are approved to authorize cash assistance payments. The Housing Specialist will meet with the HAP agencies and the Norman Liaisons to determine what other barriers exist and how to expedite the process.

One barrier that has been suggested in the past is the lack of fax machines. DCFS understands the importance of fax machines to ensure that cash assistance payments are expedited. Due to the reorganization of DCFS agencies and the new policy to allow supervisors to authorize cash assistance payments, DCFS needs to determine if and where more fax machines are needed. DCFS will review the need for more fax machines and report back to the monitors by December 31, 1995.

According to the HAP agencies, the failure to obtain cash assistance quickly usually occurs when the HAP agency has depleted their cash assistance funds.⁴ The frequency that this will occur will be dramatically reduced once the ISD program is in operation. The Housing Specialist will meet with the HAP agencies regularly to monitor their funds.

³The monitors reported that six agencies had withdrawn from HAP or had an inactive contract resulting in counties and cities that are not served by a HAP agency.

⁴HAP agencies recently told the Housing Specialist that they usually receive cash assistance within 2 to 7 day of their request. Although they did report that there have been incidents when it took as long as three weeks to receive cash assistance, this usually occurred when they had to seek assistance from another HAP agency because their funds had been depleted.

Programmatic Reporting and Data Collection

DCFS shares the monitors' concerns that accurate data regarding the number of referrals to the HAP agencies and the number of families placed into housing is not available. Contracts with the HAP agencies stipulate that they are expected to submit a Status report to DCFS within 10 days of the initial referral (section 8.5.1). Information contained in the Status Reports include the DCFS office and caseworker that referred the family, family demographics and the plans to stabilize the family. The contracts also stipulate that the HAP agencies are expected to complete Progress Reports every 30 days (section 8.5.2) and Summary Data for every family placed in housing (Section 8.6). Information contained in these reports includes assessments of the families housing needs, plans to meet their housing and other subsistence needs and whether the family was placed in permanent housing.

DCFS will combine these three reports into one report this fiscal year. This will reduce the reporting requirements of the HAP agencies thus allowing them to spend more time serving their clients. This report will still allow OLM to collect information regarding the number of families referred to the HAP agencies and the number of families housed. The Housing Specialist will contact the HAP agencies regularly to make sure that they submit their reports timely. The Housing Specialist will also keep accurate records on the number of referrals and families placed in housing.

The Housing Specialist will also monitor other programmatic requirements stipulated in the contracts. HAP agencies are asked to provide DCFS with names, address and phone numbers of their employees (Sections 8.2). The Housing Specialist will keep an accurate list of the HAP agencies and employees.

Difficulties Placing Families

The monitors report that the HAP agencies have been very successful at placing families in housing. DCFS understands the barriers families face when seeking affordable housing and is encouraged by the performance of the HAP agencies. Obviously many of the barriers faced by the HAP agencies are beyond their control. The Housing Specialist was hired to assist the HAP agencies negotiate any obstacles that thwart placement of families into housing. These obstacles differ from area to area. Some HAP agencies have a more difficult task housing their families than others because of the number of obstacles families in the communities they serve face. The Housing Specialist will provide additional assistance to these HAP agencies to assist them place families in affordable housing.

The Housing Specialist will contact the HAP agencies bi-monthly to disseminate information. Many caseworkers from the HAP agencies have told the Housing Specialist that they need more housing resources to help place the families they serve. The Housing Specialist will help the HAP agencies maintain a list of vacant housing by providing lists of private subsidized housing throughout Illinois by October 1, 1995. He will develop a network of agencies that assist families in the Chicago area obtain housing to share housing resources.

Unfortunately, as the monitors note, most affordable housing in Illinois, especially in the

Chicago area, has long waiting lists. To address the length of time it takes to place a family in affordable housing, DCFS has developed agreements with local public housing authorities to prioritize the applications of *Norman* families. These agreements have significantly reduced the amount of time that a *Norman* family will wait before entering subsidized housing. The Housing Specialist will meet with public housing authorities (PHA) throughout the state to negotiate similar agreements.

An agreement with the Chicago Housing Authority (CHA) has allowed *Norman* families to move into apartments quickly. DCFS is currently in the process of renewing the agreement with CHA. HAP agencies have reported that they are satisfied with this agreement although they are not always satisfied with the way it is implemented by employees of the local developments. DCFS met with the Director of CHA's Occupancy Department, J. Joy Bailey, to discuss these problems. Ms. Bailey agreed to work with the Housing Specialist to ensure that *Norman* families are placed in CHA housing as quickly as possible.

While some families have been placed in public housing, many others are not interested in applying. As the monitors state in their report, most families do not want to be housed in high rise public housing. Most low-income families, if given the option, would prefer to be part of the Section 8 tenant based or project based programs. In their report, the monitors praise an agreement made between a HAP agency in Lake County and the Lake County Housing Authority which gives *Norman* families preferential status. In Waukegan, the PHA was awarded Section 8 certificates through the United States Department of Housing and Urban Development's (HUD) Family Unification Program. The Housing Specialist will work with local PHAs and HUD to assist *Norman* families obtain affordable housing through the Section 8 programs. The Housing Specialist will also train HAP employees how to apply for subsidized housing programs.

The Monitors and the HAP agencies have made a number of other excellent suggestions with regard to accessing housing through Section 8 programs. These include developing a Section 8 contact person at the local public housing authorities and developing agreements with public housing authorities to grant extensions for person who have a Section 8 number until their children have been returned home. The Housing Specialist will work to develop these and other innovative solutions, such as fully utilizing the Gautreaux program,⁵ to help the HAP agencies place their families in affordable housing.

Some HAP agencies have requested that DCFS help them access subsidized housing managed by private developers. We are fortunate that many of the most successful not-for-profit developers in the country are located in Illinois. DCFS agrees that this is an important resource that must be fully utilized. The Housing Specialist will develop lists of private developers that manage subsidized apartments to assist the HAP agencies house their families. The Housing

⁵In Chicago the Leadership Council for Metropolitan Open Communities offers a program to assist families who are currently or were formerly in CHA housing or are on the CHA waiting list obtain Section 8 certificates to obtain housing in the suburbs.

Specialist will also work with these developers to develop agreements to access affordable housing for *Norman* families.

Another concern raised in the monitors' report is that the HAP requirement of placing families in housing that costs within 30-50% of their income is unrealistic. The contracts with the HAP agencies stipulate that the HAP agency work with the family until they are stabilized in permanent, affordable housing (Section 4.2.5). The contract defines affordable as 30% of the households income. Although DCFS believes that assisting families obtain affordable housing is a worthwhile goal, it understands the difficulty HAP agencies face. During times when affordable housing is in short supply some households will have to spend over 50% of their income on housing. Because of this DCFS has considered this stipulation as a goal rather than a requirement. DCFS will consider ways to make this goal more practical and realistic. Two possible solutions could be to allow the HAP agencies to include food stamps in the households budget⁶ and to require that HAP agencies assist families apply for subsidized housing when placing them in housing that is not affordable. DCFS will determine if changes need to be made to the contracts with the HAP agencies for the 1997 fiscal year.

Follow-Up Services

DCFS believes that follow-up services are an important part of family stabilization. According to the contracts with the HAP agencies, follow-up services will begin once the family is housed to identify any housing or subsistence problems and help the family access resources that will facilitate stabilization. The Housing Specialist will work with the HAP agencies to ensure that families fully utilize public and private services located in their community.

The contract further stipulates that follow-up visits will occur every other week for the first month and once a month thereafter (Section 4.2.5). HAP agencies are allowed to bill DCFS for providing follow-up services (Section 9.2.10). The Housing Specialist will monitor the HAP agencies compliance with this portion of the contract.

According to the Monitor's report, some agencies are concerned that discontinuing follow-up services after only three months limits their ability to stabilize some families. DCFS realizes that some families may require follow-up services for a longer period of time than others. While there are some predictors to the likelihood that a family will remain stable after being placed in housing (e.g. stability of income, percentage of income apportioned for rent, quality of apartment and landlord etc.), the best predictor continues to be the caseworker's assessment of the family's situation. The contracts with the HAP agencies already allow for the agency to extend the length of time that follow-up services can be offered to the family when the HAP agency and the Department agree in writing to do so (Section 4.2.5). OLM is not

⁶The concept of including the value of food stamps and other non-cash benefits is not new. The National Research Council suggests that the federal government include the value of non-cash benefits when determining poverty levels. The National Research Council believes that this would give a more realistic measure of household budgets.

aware of any request that a HAP agency has made to extend follow-up services that has been denied by the DCFS regional office.

Over the next year the Housing Specialist will examine situations that will likely lead to families losing their housing after placement. These indicators will be specified in a report which will be distributed to HAP agencies by April 1, 1996. The Housing Specialist will also determine the costs and benefits of extending the period that the HAP agency will be expected to provide follow-up services for certain families. DCFS will determine if HAP agencies should be required to provide follow-up services for more than three months for certain families.

RESPONSES TO RECOMMENDATIONS MADE IN THE MONITOR'S REPORT

1. HAP contracts need to include provisions for monthly data collection of the number of referrals, placements and ongoing cases. This data needs to be monitored consistently.

DCFS Response:

Beginning July 1, 1995, the Housing Specialist will assume the responsibility of closely monitoring the HAP agencies compliance with the programmatic reporting section of the contracts. The contracts with the HAP Agencies stipulate that HAP agencies are expected to submit a Status report to DCFS within 10 days of the initial referral (section 8.5.1), a Progress Report every 30 days (Section 8.5.2) and a Summary Data for each family placed in housing (Section 8.6). Information contained in these reports will allow DCFS to document the number of families referred to HAP agencies and the number of families placed in housing by HAP agencies. DCFS will combine these three reports into one report this fiscal year. This report will still allow OLM to collect information regarding the number of families referred to the HAP agencies and the number of families housed.

2. HAP contracts should incorporate the flexibility of extending follow-up services beyond three months, if needed, in order to ensure family stabilization.

DCFS Response:

DCFS agrees with the monitors' assertion that some families need follow-up services for a greater period of time. DCFS currently relies on the expertise of the HAP caseworker to decide whether the follow-up period needs to be extended. The contracts with the HAP agencies already allow for the agency to extend the length of time that follow-up services can be offered to the family when the HAP agency and the Department agree in writing to do so (Section 4.2.5). The Office of Litigation Management is not aware of any request that a HAP agency has made to extend follow-up services that were denied by a DCFS regional office. The Housing Specialist will remind the HAP agencies that they can extend follow-up services beyond three months.

Over the next year the Housing Specialist will examine situations that will likely lead to families losing their housing after placement. These indicators will be specified in a report which will be distributed to HAP agencies by April 1, 1996. The Housing Specialist will also determine the costs and benefits of extending the period that the HAP agency will be expected to provide follow-up services for certain families. DCFS will determine if HAP agencies should be required to provide follow-up services for more than three months for certain families.

3. The Department must decide immediately on an accurate reporting mechanism for both HAP and cash assistance data.

DCFS Response:

DCFS is currently waiting for a decision from Paula Matea from the State's Information Systems Department regarding setting up a computerized information system. This system would be very similar to the NOMAD system that was previously discussed with the monitors. This system would help us monitor the amount of cash assistance that each HAP agency has in their budget. DCFS will continue to update the monitors regarding the status of this system.

4. The Department should target those areas of the State without HAP contracts to determine need and reason for lack of contract.

DCFS Response:

The Housing Specialist will meet with the Norman Liaisons from the regional offices and the previous HAP agencies in areas of the state that do not have a HAP contract. DCFS will determine the need for a HAP agency in those regions and report back to the monitors by December 31, 1995. If it is determined that an area that is not currently being served by a HAP agency would benefit from receiving such services, the Housing Specialist will work with the Norman Liaisons to locate an appropriate agency to serve as a the HAP agency.

5. The Department should target areas with low-utilization rates to determine the reasons, especially in Cook County DCP, South Area Office, Aurora and Peoria.

DCFS Response:

The Housing Specialist will meet with DCFS Liaisons at Cook County DCP, South Area OFFICE, Aurora and Peoria by October 1, 1995 to determine the reasons for not utilizing HAP agencies and to express the usefulness of the HAP agencies.

DCFS intends to train casework supervisors on HAP by August 1, 1995. DCFS will also review the CORE training to determine if new information regarding HAP is needed. These trainings will inform DCFS staff of the usefulness of HAP and encourage them to refer *Norman* families to HAP agencies that could benefit from their services.

6. The Department should require Cook County Liaisons from DCP to attend Cook County HAP Meetings.

DCFS Response:

Norman Liaisons will continue to be encouraged to attend the Cook County HAP meetings. The Office of Litigation Management will meet with John Goad, Administer of Protective Services, to ask him to require that a Norman Liaison from DCP attend Cook County

HAP meetings. The Office of Litigation Management will send copies of all HAP meeting notices to John Goad.

7. Training is needed at all levels about housing and other *Norman* resources. More in depth training needs to be included in the CORE training, and the Department should offer training throughout the State for internal and private agency staff on housing resources, including a statewide conference.

DCFS Response:

DCFS intends to train all casework supervisors on the *Norman Consent Decree* by August 1, 1995. DCFS will review the CORE training to determine what additional information should be added to ensure that all DCFS workers understand the consent decree. OLM will also conduct inservices on *Norman* and the HAP program. The Housing Specialist will coordinate the statewide housing conference which will be held this fiscal year.

8. There should be more fax machines in DCFS offices available to the *Norman* Liaisons. HAP agencies should be informed that purchase of fax machines can be incorporated into their costs for service.

DCFS Response:

Due to the reorganization of DCFS agencies and the new policy to allow supervisors to authorize cash assistance payments, DCFS needs to determine if and where more fax machines are needed. DCFS will review the need for more fax machines at both the DCFS regional offices and at the HAP agencies and report back to the monitors by December 31, 1995.

9. The housing specialist needs to be hired as soon as possible to strengthen the Housing Advocacy Program. In addition to the other policy and practice issues, this person should be given the responsibility to conduct the reviews mentioned above, coordinate a statewide housing conference and monitor all HAP contracts.

DCFS Response:

DCFS hired John Cheney-Egan to fill the Housing Specialist position on June 19, 1995. The Housing Specialist has assumed the responsibility of monitoring all HAP contracts and conducting reviews of HAP immediately. The Housing Specialist will coordinate the statewide housing conference which will be held this fiscal year.

