



California Behavioral Health Planning Council

ADVOCACY • EVALUATION • INCLUSION

CHAIRPERSON

Deborah Starkey

EXECUTIVE OFFICER

Jenny Bayardo

ADDRESS

P.O. Box 997413
Sacramento, CA 95899-7413

PHONE:

(916) 701-8211

FAX:

(916) 319-8030

MS 2706

August 5, 2026

Meghan Marshall

Executive Officer

California Interagency Council on Homelessness

651 Bannon Street, Suite 1500

Sacramento, CA 95811

RE: CBHPC Recommendations – State Guidance on Recovery Housing

Dear Ms. Marshall:

The California Behavioral Health Planning Council (CBHPC) appreciates the California Interagency Council on Homelessness' (Cal ICH) leadership in developing the state guidance, "Implementing Recovery Housing Programs in Alignment with California Housing First Requirements." As Cal ICH continues to refine statewide direction on Recovery Housing, CBHPC respectfully offers feedback and recommendations intended to strengthen resident safety, support recovery outcomes, and promote consistent implementation across programs.

CBHPC's Housing and Homelessness Committee (HHC) has been actively engaged in discussions on Recovery Housing and the opportunities for counties to fund such programs under the Behavioral Health Services Act (BHSA). CBHPC acknowledges that Recovery Housing plays a critical role in supporting individuals with behavioral health needs and is strongly committed to promoting safe and effective housing options that align with state policy and helping counties meet new BHSA housing requirements.

Thirty percent of each county's Behavioral Health Services Act (BHSA) funding allocation must be used for housing interventions, and Recovery Housing is recognized as an allowable setting under the BHSA. Recent guidance from Cal ICH also clarified that Recovery Housing is an eligible use of state funds, and we strongly support efforts to strengthen and expand these programs statewide. As counties begin utilizing Behavioral Health Services Act housing interventions funds, state guidance will help them maximize these investments, broaden the availability of housing options, and ensure programs operate safely and effectively. The Committee reviewed the guidance during its June 2026 Quarterly Meeting and offers the following feedback on Table 1: Summary of Housing First Core Components in State Law.



California Behavioral Health Planning Council

ADVOCACY • EVALUATION • INCLUSION

CHAIRPERSON

Deborah Starkey

EXECUTIVE OFFICER

Jenny Bayardo

ADDRESS

P.O. Box 997413
Sacramento, CA 95899-7413

PHONE:

(916) 701-8211

FAX:

(916) 319-8030

MS 2706

Component 1: Entry Requirements

The intent of Component 1 is to align Recovery Housing programs with Housing First principles by ensuring that sobriety, treatment participation, or other preconditions are not used as eligibility barriers. We agree that this approach is important for maintaining low-barrier access and supporting individuals at different stages of recovery.

Recommendations:

- Clarify that residents should not be under the influence of alcohol or illegal substances at the time of entry, as admitting someone who arrives visibly intoxicated or actively under the influence poses safety risks and undermines the objectives of an abstinence-based program. Including this clarification would help programs maintain a safe living environment and support the recovery of all residents.
- Clarify that Recovery Housing does not provide detoxification services, and individuals needing detox may require medically supervised care.

Components 3 and 8: Referrals and Coordinated Entry

CBHPC understands that Components 3 and 8 intend to ensure that Recovery Housing programs remain accessible to individuals experiencing homelessness and are integrated with Housing First requirements when operating within the homeless response system. At the same time, some of the language may unintentionally suggest that Recovery Housing is intended exclusively for individuals experiencing homelessness.

Recovery Housing models also serve many individuals who are not currently experiencing homeless, including those exiting treatment, returning from justice settings, or living in unstable or unsafe environments.

Recommendations:

- Refine the language so that coordinated entry applies only to Recovery Housing programs funded as part of the homeless response system.
- Clarify that programs, not funded to serve people experiencing homelessness, may continue accepting referrals from other appropriate sources, such as behavioral health providers, treatment programs, hospitals, or community organizations.



California Behavioral Health Planning Council

ADVOCACY • EVALUATION • INCLUSION

CHAIRPERSON

Deborah Starkey

EXECUTIVE OFFICER

Jenny Bayardo

ADDRESS

P.O. Box 997413
Sacramento, CA 95899-7413

PHONE:

(916) 701-8211

FAX:

(916) 319-8030

MS 2706

Component 7: Eviction Policy

Component 7 ensures that relapse or substance use alone is not grounds for eviction, and that Recovery Housing Programs respond to these situations with supportive, evidence-based approaches. This aligns with best practices in recovery-oriented housing and recognizes that relapse can be part of an individual's recovery journey.

Recommendations:

- Incorporate language consistent with Assembly Bill 1556 (Haney): require programs to implement a return-to-use policy or relapse response plan following an incident of substance use.
- Clarify that eviction should be reserved for lease violations or illegal activities that jeopardize the health and safety of other residents.

Component 10: Hard Reduction and Medication-Assisted Treatment

Component 10 encourages Recovery Housing programs to engage participants with supportive, non-judgmental approaches and to ensure that residents utilizing medication-assisted treatment (MAT) are not excluded from recovery housing. CBHPC supports this component as it aligns with evidence-based treatment standards and helps ensure equitable access for individuals who rely on MAT as part of their recovery.

Recommendations:

- Remove broad references to harm reduction strategies related to MAT. Some harm reduction approaches, such as the designation of spaces for drug use, are inconsistent with the abstinence-based framework of Recovery Housing. This clarification would help programs uphold abstinence-based models while still providing appropriate support to residents.
- Affirm that Recovery Housing programs must allow the use of MAT and may not deny admission to individuals who use these medications.
- Recommend that programs provide access to naloxone/Narcan and ensure that staff and residents receive appropriate training in its use.

CBHPC appreciates the opportunity to provide this feedback and looks forward to continued partnership with Cal ICH as the state advances its implementation of the Behavioral Health Services Act. We remain



California Behavioral Health Planning Council

ADVOCACY • EVALUATION • INCLUSION

CHAIRPERSON
Deborah Starkey

EXECUTIVE OFFICER
Jenny Bayardo

committed to supporting policies and practices that strengthen recovery housing, uphold resident safety, and enhance alignment with California's Housing First requirements. Thank you for your leadership and for your consideration of CBHPC's recommendations.

If you have any questions regarding our recommendations, please contact the Council 's Executive Officer, Jenny Bayardo, by email at Jenny.Bayardo@cbhpc.dhcs.ca.gov or by phone at (916) 750-3778.

Sincerely,

Barbara Mitchell
Chairperson
CBHPC Housing and Homelessness Committee

ADDRESS

P.O. Box 997413
Sacramento, CA 95899-7413

PHONE:

(916) 701-8211

FAX:

(916) 319-8030

MS 2706