

## FYI Questions and Answers

### Foster Youth to Independence (FYI) Initiative

**Frequently asked questions (FAQs) submitted to [FYI@hud.gov](mailto:FYI@hud.gov) will be answered in this document. The document will be updated periodically and reposted with the date it was update.**

**Note:** On September 3, 2021, HUD issued Notice PIH 2021-26. This notice replaces Notice PIH 2020-28. HUD is no longer accepting requests for FYI vouchers under Notice PIH 2020-28. Please submit requests for FYI voucher using the updated [sample request email](#).

Throughout this Q&A document FYI TPV refers to assistance awarded under Notice PIH 2019-20. FYI TPVs are referenced where the question impacts awards under Notice PIH 2019-20. Otherwise, references are to FYI Vouchers under the new notice. Additionally, references to “notice” are to Notice PIH 2021-26, unless specified.

**\*\*[Date of last revision: September 29, 2021]\*\***

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## Eligibility

- 1. Can I apply for assistance under the notice and submit an application(s) for funding under a Family Unification Program (FUP) Notice of Funding Availability (NOFA)?**

Yes. Applying for funds under this notice does not exclude PHAs from pursuing funding under a future NOFA, assuming all eligibility requirements of the NOFA are otherwise met.

**2. Can I apply for funding under a FUP NOFA if I've been awarded TPVs under this notice?**

Yes. Administering assistance under the notice would not preclude a PHA from applying for funding under a future NOFA, assuming all eligibility requirements of the NOFA are otherwise met.

**3. My PHA administers the FUP, but does not have enough vouchers to serve all FUP-eligible families and FUP-eligible youth, are we eligible to request assistance under the notice? (Updated)**

Eligibility for PHAs administering FUP and/or FYI vouchers awarded in prior federal fiscal years is limited to PHAs with validated VMS utilization of at least 90 percent at the time of the request as reported under the FUP VMS field. Where the PHA has a combined FYI and/or FUP (as applicable) size of no more than 5 vouchers, the PHA may request FYI vouchers if the validated VMS data reflects at least 50 percent utilization under the FUP VMS field. HUD will not use additional documentation from the PHA to confirm this threshold requirement.

**4. Can youth in the HCV program be transferred to a FYI voucher?**

No. The funding would not be used appropriately if a regular HCV youth is transferred to a FYI voucher. In this particular situation, these youth are not homeless or at-risk of homelessness because their housing need has already been met through the existing HCV program.

**5. What happens to the status of a FUP-eligible youth if that youth gives birth after she has leased up under a FYI TPV or FYI voucher?**

The youth is still eligible for the full 36 months of assistance.

**6. In order to qualify, does a youth have to have lived only in foster care or would any residential placement by the PCWA qualify them for the FYI voucher?**

Under the federal definition of foster care, placement can include, but is not limited to, "placements in foster family homes, foster homes of relatives, group homes, emergency shelters, residential facilities, child care institutions, and pre-adoptive homes." (See 45 CFR 1355.20.)

**7. Are youth being discharged from an institution eligible for FYI?**

A youth being discharged from an institution may meet the definition of being at risk of homelessness. The definition includes, among others, a person that is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution). (See 24 CFR 576.2) The youth must also:

- i. Have an annual income below 30 percent of median family income for the area, as determined by HUD; and
- ii. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition at 24 CFR 576.2.

To be eligible for FYI, the youth must also meet the age requirement for participation and have had qualifying foster care involvement as verified by the PCWA.

**8. At which point must a youth be no more than 24 years old?**

A youth must be no more than 24 years old at the time of PCWA certification as FUP-eligible **and** also at the time of HAP contract execution. Timing of the referral is particularly important in this case. For example, a PCWA may be planning to refer a youth that is still 24 years old at the time of referral but is close to turning 25 years old. Although the youth meets the age requirement at the time of referral, there could be a strong likelihood that, at the time of HAP contract execution, the youth may no longer meet the age requirement. The PHA and PCWA will have to ensure that the youth does not reach the age requirement limit before the effective date of the HAP contract or the youth will no longer be eligible for an FYI voucher.

**9. What documentation is the PHA required to have in their file regarding the eligibility determination made by the PCWA? Is the referral sufficient or do we need to have the full documentation that demonstrates their eligibility?** The PHA is not required to maintain full documentation that demonstrates youth's eligibility. In order to maintain an audit trail, the PHA should keep the referral or certification from the PCWA.

**10. The Fostering Connections to Success and Increasing Adoptions Act of 2008 (P.L. 110-351) amended the title IV-E program to enable states and tribes to provide extended foster care through a federal option to youth up to the age of 21, as the state/tribe may elect. Are youth participating in the extended federal foster care program eligible for FUP?**

The purpose of the title IV-E foster care program is to provide partial reimbursement to states/tribes for the costs associated with safely maintaining children in foster care. States and tribes operating the program have the option to serve eligible youth ages 18 – 21 in foster care. An otherwise eligible youth age 18 or older in foster care must be placed in a licensed foster family home, child-care institution, or a supervised independent living setting. Youth participating in the title IV-E foster care program are entitled to receive or have paid on their behalf a title IV-E foster care maintenance payment to cover the costs of food, clothing and shelter, among other costs. Supplementing title IV-E foster care with the housing assistance under the FUP is not a permitted use of this resource.

**11. Can organizations other than PHA's administer FYI vouchers?** No. The PHA must have an existing ACC with HUD for HCVs. A contract administrator that does not have an ACC with HUD for HCVs but constitutes a PHA under 24 CFR 982.4 by reason of its administering HCVs on behalf of another PHA, is not eligible to submit an application under this notice. Nonprofit administrators of HCV mainstream assistance, which by statute are classified as PHAs solely for the purpose of administering HCV mainstream assistance, are also ineligible for FYI.

**12. What is the minimum number of vouchers that may be requested?**

There is no minimum request size. As few as one FYI voucher may be requested.

**13. If foster youth have a criminal record, are they eligible to participate in the program?**

In most cases, PHAs and owners have discretion to decide whether or not to deny admission to an applicant with certain types of criminal history, or terminate assistance or evict a household if a tenant, household member, or guest engages in certain drug-related or other criminal activity on or near the premises (in the case of the HCV program). HUD regulations outline the limited instances where denial of admission or termination of assistance is required. (See 24 CFR 982, subpart L.) In deciding whether to exercise their discretion to admit or retain an individual or household that has engaged in criminal activity, PHAs and owners may consider all of the circumstances relevant to the particular admission or eviction decision, including but not limited to: the seriousness of the offending action; the effect that eviction of the entire household would have on family members not involved in the criminal activity; and the extent to which the leaseholder has taken all reasonable steps to prevent or mitigate the criminal activity. Additionally, when specifically considering whether to deny admission or terminate assistance or tenancy for illegal drug use by a household member who is no longer engaged in such activity, a PHA or owner may consider whether the household member is participating in or has successfully completed a drug rehabilitation program, or has otherwise been rehabilitated successfully.

For more information on this topic, see Notice PIH 2015-19.

**14. When a young person leaves the program, can the PHA request an FYI voucher on behalf of another young person? (Updated)**

For PHAs awarded FYI TPVs under Notice PIH 2019-20 where the recipient of the FYI TPV leaves the program, the PHA may request an FYI voucher under the requirements of Notice PIH 2021-26. PHA should also be mindful of the requirement to inform HUD should a youth not use a voucher or leave the program.

For PHAs awarded FYI vouchers under Notice PIH 2020-28 and Notice PIH 2021-26 where the recipient of the FYI voucher leaves the program, the PHA must continue to use the FYI voucher for eligible youth upon turnover. Where there are more eligible youth than available FYI turnover vouchers, the PHA may request an FYI voucher under the requirements of Notice PIH 2021-26.

If another eligible youth is not available, the PHA must notify HUD before the end of the calendar year, and HUD will reduce the PHA's HCV assistance to account for the removal of the FYI assistance from the PHA's HCV baseline. Notification should be provided to FYI@hud.gov and the PHA's respective Financial Management Center Financial Analyst.

**15. Our PHA is a large agency and/or our jurisdiction covers a wide area, are we still limited to 25 vouchers in a fiscal year? (Updated)**

PHAs that have been awarded the initial maximum cap of 25 vouchers in a fiscal year that have achieved at least 90 percent utilization of these vouchers may request up to an additional 25 vouchers in the fiscal year. PHAs will not be awarded more than 50 non-competitive vouchers in a fiscal year.

**16. Are youth exiting the juvenile justice system eligible to participate in the program?** Youth exiting the juvenile justice system will need to meet the eligibility requirements for the program

**17. What would a PHA do under this program if the age of majority to sign a lease is 21 in the state where the PHA is located?**

PHAs must administer assistance under FYI consistent with state law. A best practice is for the PHA to educate the PCWA on the HCV program, including eligibility requirements. The PHA may incorporate into the partnership agreement a condition that the PCWA only refer of the Social Security Act and meets all other requirements. (See Section 7 of the notice.) The PHA must not enter into a Housing Assistance Payment Contract (HAP contract) with the youth until the youth reaches the age of 18. As a result, when requesting assistance on behalf of such young person, the PHA-identified effective date for the voucher should be no sooner than the youth's 18th birthday.

**18. Does a youth's decision not to participate in extended foster care make the youth ineligible for FYI?** No. Having participated in extended foster care is not an eligibility requirement for participation in FYI.

**19. May a request be made for a youth who has not reached 18 years of age?** A request for assistance may be submitted on behalf of a youth who will leave foster care within 90 days, in accordance with a transition plan

**20. 19. Does the youth have to have been in custody of the PCWA making the eligibility determination, or may the youth have been in custody of another PCWA?** The youth does not have to have been in the custody of the PCWA that is partnering with a PHA to administer FYI vouchers. The partnering PHA has the responsibility of verifying the youth meets all eligibility requirements.

**21. If the youth exited foster care before their 18th birthday are they still eligible?**

Leaving foster care before a youth's 18<sup>th</sup> birthday does not preclude their participation. The youth must meet all of the following eligibility requirements:

1. Has attained at least 18 years and not more than 24 years of age;
2. Left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act; and
3. Is homeless or is at risk of becoming homeless at age 16 or older

**22. If a youth family member qualifies for the FYI vouchers, can the whole family be supported? (Updated)**

The youth must first meet the eligibility requirements per Notice PIH 2021-26. Then, all applicants must meet the PHA's eligibility requirements for the HCV program. After voucher issuance, the FYI voucher holder is treated the same as any other voucher holder on the PHA's program. For example, if the PHA would allow a family member to be added after voucher issuance, and the individual was otherwise eligible for assistance, the PHA could permit the individual to be added as a household member following the PHA's Administrative Plan.

**23. Is a youth that is 16 years of age eligible for the program? (Updated)**

To be issued a voucher the youth must be between the ages of 18 – 24.

In FAQs# 21 HUD says that a request for assistance may be submitted on behalf of a youth who will leave foster care within 90 days, in accordance with a transition plan. As a result, a youth may be referred for FYI prior to reaching 18 years of age, but such youth may not be issued a voucher until the youth turns 18. [CARES Act waiver Notice PIH 2021-14](#), HCV-12 expands that window from 90 to 120 days.

- 24. Does the public housing authority also need to determine eligibility based on HCV criteria upon placing the youth on the HCV waiting list?** Yes, the notice says, “Any youth certified by the PCWA as eligible and not on the HCV waiting list must be placed on the waiting list (pending HCV eligibility determination).
- 25. Those who receive funding in the sum of \$400.00 (title IV-E Foster Care funds) without any housing support are they still eligible to receive a FUY or FYI? If they receive the \$400.00, does it make them ineligible for the FUP or FYI even if they are homeless? (Updated)**  
 To receive assistance under Notice PIH 2021-26, the youth must meet the eligibility requirements specified in the notice. This is inclusive of Left foster care, or will leave foster care within 90days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act. The purpose of the title IV-E foster care program is to provide partial reimbursement to states/tribes for the costs associated with safely maintaining children in foster care. Youth participating in the title IV-E foster care program are entitled to receive or have paid on their behalf a title IV-E foster care maintenance payment to cover the costs of food, clothing and shelter, among other costs. Supplementing title IV-E foster care with the housing assistance under the FUP is not a permitted use of this resource. The state considers the youth in title IV-E foster care, then they have not left foster care. States can determine if and the amount of money that a youth may directly receive (or that they do not receive a payment directly). Please also see FAQ#10
- 26. The notice does not lay out any requirements on timeliness of notifying HUD if another youth is not available for a voucher at turnover or in the case where a youth with a voucher does not lease up. Is that information located elsewhere, or is there a practice PHAs should abide by? And somewhat related, if a youth leaves the program prior to the 36 months mark do they maintain eligibility for the balance of months on the voucher?**  
 HUD did not provide guidance on the timeframe for notification of the unused FYI voucher. However, this can impact a PHA’s utilization therefore, notification should be provided to allow sufficient time for HUD to reduce the PHA’s HCV assistance to account for the removal of the FYI assistance from the PHA’s HCV baseline. Notification should be provided to [FYI@hud.gov](mailto:FYI@hud.gov) and the PHA’s respective Financial Management Center Financial Analyst.
- 27. When should a PHA determine the youth’s eligibility? The PHA only has 60 days to issue a voucher once they receive the completed application from the youth. The notice says the PHA can request assistance from HUD once they “received a referral of an eligible youth.” Does this use of “eligible” refer to eligible according to FUP eligibility requirements or eligible for voucher assistance? (Updated)**



In accordance with Notice PIH 2021-26, a request for assistance may not be made until the PHA has received a referral of an eligible youth from the partnering PCWA. The word “eligible” is addressing the youth’s prior qualifying foster care involvement. Once the youth is certified by the PCWA the youth must meet the PHA’s eligibility requirements for voucher assistance. In the FYI Questions and Answers, HUD clarified that a request for assistance may be submitted on behalf of a youth who will leave foster care within 90 days, in accordance with a transition plan. The PHA should follow its Administrative Plan policies for when it determines eligibility.

Notice PIH 2021-26 includes several waivers and alternative requirements that may be helpful to PHAs looking to start an FYI program. HCV-3 provides a waiver for the extension of voucher search term and HCV-12 provides an alternative requirement allowing a PHA to accept referrals from the PCWA for youth who will leave foster care within 120 days. The Notice is accessible at the following link: <https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-14pihn.pdf>

**28. We are trying to determine how to further articulate how #3 of the eligibly requirements (below) on the HUD website will relate to eligibility for youth in our county given that youth have to be 18 to receive the voucher. (Updated)**

- 1. Has attained at least 18 years and not more than 24 years of age;**
- 2. Left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act; and**
- 3. Is homeless or is at risk of becoming homeless at age 16 or older.**

A request cannot be made for a youth who has not reached 18 years of age. If the youth meets eligibility under 1, 2, and is homeless or at risk of becoming homeless, they would qualify.

A request for assistance may be submitted on behalf of a youth who will leave foster care within 90 days, in accordance with a transition plan. Additionally, the CARES Act has an alternative requirement through December 31, 2021, where a PHA may receive referrals of otherwise eligible youth who will leave foster care within 120 days. I have included an excerpt below from Notice PIH 2021-14. The Notice is accessible at the following link:

<https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-14pihn.pdf>

**29. The EFC stipend may or may not be counted as income that is depended on guidelines within the Housing Authority and their Admin plan correct?**

Youth participating in the title IV-E foster care program are entitled to receive or have paid on their behalf a title IV-E foster care maintenance payment to cover the costs of food, clothing and shelter, among other costs. Supplementing title IV-E foster care with the housing assistance under the FUP is not a permitted use of this resource. The PHA will want to determine whether payments, outside the title IV-E foster care program, fall under 24 CFR 5.609(c)(8)(iii) or are otherwise excluded from annual income.

**30. Are Extended Foster Care youth eligible for FYI? (Updated)**

No. Supplementing title IV-E foster care with the housing assistance under the FYI is not a permitted use of this resource. To receive assistance under Notice PIH 2021-26, the youth must meet the eligibility requirements specified in the notice. This is inclusive of Left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act.

**31. Youth eligibility is listed as age 18-24 or 16 or older and at risk of being homeless or homeless. Is the at risk of homeless or homeless only applicable to youth ages 16 and older? Can any youth age 18 and older apply for the voucher if transitioning out of care? Also want to clarify that the youth must have left foster care w/in 90 days to be eligible?**

If a youth meets eligibility under 1 *Has attained at least 18 years and not more than 24 years of age*, 2 *Left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act*, and is homeless or at risk of becoming homeless, they would qualify.

**32. Can you please provide further information on part 3 of youth eligibility (Is homeless or is at risk of becoming homeless at age 16 or older)? Do the youth have to have been at risk of homelessness at age 16, but now they are 18 to be eligible? Additionally, the change in part 2, does that mean that the youth could have been involved with the foster system at any age?**

A youth's initial foster care involvement could have occurred at any age. However, a request cannot be made for a youth who has not reached 18 years of age. A request for assistance may be submitted on behalf of a youth who will leave foster care within 90 days, in accordance with a transition plan. If a youth meets eligibility under 1, 2, and is homeless or at risk of becoming homeless, they would qualify. The CARES Act waiver notices expands that window for the time being.

**33. Are foster youths eligible for this program if they are applying as a household. For example, the mother and the child are also on the application? (Updated)**

The youth must first meet the eligibility requirements per Notice PIH 2021-26. Then, all applicants must meet the PHA's eligibility requirements.

## Application Process

**34. Is there a formal application for this program through [grants.gov](https://www.grants.gov)? (Updated)**

No. The application requirements are explained in Section 16 of Notice PIH 2021-26.

**35. Is the PHA required to submit the partnership agreement prior to submitting the individual request for vouchers? (Updated)**

No. PHAs are not required to submit the partnership agreement. Rather, they are required to certify that the PHA has entered into a partnership agreement with the PCWA, and CoC (as applicable). The application requirements are explained in Section 16 of Notice PIH 2021-26.

**36. What is the deadline to apply for assistance under the notice?** Subject to the conditions outlined in Section 5 of the notice, HUD will accept



PHA requests for FYI vouchers under the notice on a rolling basis.

**37. Is there an emergency referral process?**

HUD has not established an “emergency referral process.” HUD processes requests in order of receipt.

**38. Our PCWA has concerns with privacy and its internal protocols in providing the names of the youth they want to use these vouchers for. Can a code be assigned to each youth for application purposes (email to HUD)?** Yes. A code, alias, initials, or full name of the youth may be used in the request for Assistance.

**39. Does the partnership agreement (MOU or letter of intent) with the PCWA need to be included in the request for assistance?**

No. The partnership agreement does not need to be included in the request for assistance. The request for assistance must include a certification that the PHA has entered into a partnership agreement with the PCWA, and as applicable, third-parties.

**40. If my PHA has previously submitted a form HUD-52515 with a request for FYI assistance, does a new form HUD-52515 need to be submitted with subsequent requests?** Yes. Each submission must include a unique form HUD-52515.

**41. HUD recently issued a revised funding application (form HUD-52515). Should PHAs use this new form? If so, what information is required?** Yes. PHAs submitting a request for assistance under the notice should use the newly revised form HUD-52515. The revised form has an expiration of July 31, 2022. Only the first page of the document needs to be included. Items E through L which appear on page two of the form do not need to be completed.

**42. Does Fiscal Year (FY) 20 utilization impact a PHA’s eligibility to request FYI vouchers in FY21? (Updated)**

Yes, FY20 utilization does not impact the PHA’s eligibility to request FYI vouchers in FY21. Eligibility for PHAs administering FUP and/or FYI vouchers awarded in prior federal fiscal years is limited to PHAs with validated VMS utilization of at least 90 percent at the time of the request as reported under the FUP VMS field. Where the PHA has a combined FYI and/or FUP (as applicable) size of no more than 5 vouchers, the PHA may request FYI vouchers if the validated VMS data reflects at least 50 percent utilization under the FUP VMS field. HUD will not use additional documentation from the PHA to confirm this threshold requirement.

**43. How many vouchers should a PHA with previously awarded FYI vouchers lease to reach the 90% utilization**

A PHA with an award of 25 FYI vouchers may request additional vouchers when it has leased up at least 22 FYI vouchers. The calculation should round down to the nearest whole number.

- 44. I have read the updates in Notice PIH 2021-26. Can you confirm that for FYI voucher request, differently than FUP, when indicating the number needed in the application process, you must list potential clients by name or code etc.? For example, it would be our agency's first request for the full 25 FYI vouchers, would we have to attach the names along with the request?**

**(Updated)**

Under Notice PIH 2019-20, PHAs were required to identify the eligible youth by name. Per Notice PIH 2021-26, PHAs must identify the youth by code, alias, initials, or full name. Therefore, your agency must identify the 25 youth. Additionally, the PHA must receive certification of eligibility for the youth from the PCWA. PHAs must use the sample request email to submit their request(s) for FYI vouchers to [FYI@hud.gov](mailto:FYI@hud.gov).

- 45. Our PHA is interest in applying for FYI vouchers. When is the submission of the application due? (Updated)**

Per Notice PIH 2021-26, subject to the following conditions, HUD will accept PHA requests for FYI vouchers under this notice on a rolling basis:

A. Funding remains available. Funding under this notice is dependent on the availability of appropriations. HUD will utilize up to \$10 million of the FUP appropriated amount under the 2021 Act for FYI.

B. Notice remains in effect. Until HUD rescinds or suspends this notice, it remains in effect.

Please have the Executive Director, Chief Executive Officer, or individual of equivalent position of the PHA used the sample request email to submit your agency's request. More resources are available on our FYI webpage at the following link:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/hcv/fyi](https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/fyi)

- 46. My PHA submitted a request for assistance under Notice PIH 2020-28, but we did not receive an award before publication of Notice PIH 2021-26. Does my PHA need to re-submit? (New)**

No. Requests submitted to HUD by PHAs pursuant to PIH Notice 2020-28 prior to the publication of this notice do not need to be re-submitted. If the request did not receive funding before the publication date and is determined eligible, it will be processed under the requirements of the new notice.

## General Program Operation

- 47. Do PCWAs have an obligation to inform PHAs of a referral's criminal history?** HUD policies and regulations do not and cannot impose an obligation on PCWAs to provide information regarding an applicant's criminal history to the PHA. However, it is in the best interest of the PHA and the PCWA for this information to be made known during the referral process, subject to any privacy laws, since an applicant's criminal history, such as a prior conviction for drug-

related criminal activity, could make the applicant ineligible for assistance under PHA policy. PCWAs often know the details and circumstances surrounding an applicant's criminal activity including, among others, whether the applicant is participating in or has successfully completed a supervised drug or alcohol rehabilitation program. Such details are helpful to the PHA in determining an applicant's eligibility and may result in the applicant being determined eligible under PHA policy.

**48. May PHAs collaborate with more than one PCWA?**

Yes, PHAs may collaborate with more than one PCWA. This may be especially useful for state-level PHAs, where there are multiple PCWAs serving different parts of the PHA's jurisdiction. PHAs considering this option must have a partnership agreement with each PCWA to administer FYI vouchers.

**49. May referrals come from agencies other than the PCWA?**

In cases where a referral comes from another organization in the community, the PCWA must certify that the youth meets the eligibility requirements under the notice, unless the PCWA has vested another organization with this authority.

**50. Can a youth awarded a tenant-based FYI voucher be required to lease at a specific development?**

No. When the housing assistance is provided in the form of a tenant-based voucher on behalf of the young person, they are able to find their own housing on the private market. The young person may be provided information about a specific location, but they cannot be required to use their assistance at the development.

**51. Do private child welfare agencies count or is it only public agencies?** For states that have privatized child welfare, the agency designated to conduct child welfare on behalf of the state may be considered a PCWA..

**51. For how long is rental assistance provided?**

Youth may receive up to 36 months of assistance.

**52. During the young person's participation in the program, is there a requirement that the participant make efforts toward maintaining sustainability?**

The notice does not establish metrics of "sustainability." The program is designed to offer the young person a minimum set of supportive services for the length of their participation in the program. A participant cannot be required to participate in these services as condition of receipt of the voucher.

**53. Can the PHA service an otherwise eligible youth from an area outside of its jurisdiction?**

In the case of providing a voucher to a youth that resides outside of the PHA's jurisdiction and that does not plan on residing in the PHAs jurisdiction upon receipt of a voucher, the PHA should review its discretionary policies on this subject. This includes reviewing whether it has a residency requirements or preference in place that may impact its ability to serve an otherwise eligible youth from outside of its jurisdiction. (See 24 CFR 982.207(b)(1).)

**54. Will encrypted emails be used to transmit individual cases to protect client confidentiality?**

The PHA and PCWA must determine applicable confidentiality requirements for making and receiving referrals for assistance.

**55. What changes to the administrative plan are required to implement these vouchers?**

PHAs should review administrative plan requirements at 24 CFR 982.54. Of particular note, 24 CFR 982.54 (d)(1) having to do with selection and admission of applicants from the PHA waiting list.

**56. If the youth is eligible for a program which offers case management with a wide array of supports, could that qualify as meeting the supportive services requirement?**

The PCWA must determine whether the supportive services offered meet the requirements found in Section 6 of the notice.

**57. May assistance under Notice PIH 2021-26 be project-based? (Updated)**

Yes. HOTMA added a new section 8(o)(13(O) to the 1937 Act, allows PHAs to project-base Family Unification Program vouchers without requiring additional HUD approval. This includes FYI vouchers awarded under Notice PIH 2021-26. All statutory and regulatory requirements that apply to the PBV program apply to vouchers awarded under [insert reference to new notice] that have been project-based.

Assistance awarded under Notice PIH 2019-20 is prohibited from being project-based.

**58. My PHA administers FYI TPV vouchers under Notice PIH 2019-20 and FYI vouchers under Notice PIH 2020-28. How should the vouchers be recorded in PIC? (New)**

For FYI TPVs awarded under Notice PIH 2019-20, the following instructions apply. PHAs must maintain a special program code for FYI TPV participants in line 2n of the Family Report (form HUD-50058) or line 2p of the MTW Family Report (form HUD-50058), as applicable. The special program code is “FYITPV.” PHAs must also properly record the date the PHA issues the voucher to the youth, the date of admittance to the program, and expiration of said voucher in line 2a.

For FYI vouchers awarded under Notice PIH 2020-28 and Notice PIH 2021-26, the following instructions apply. PHAs must maintain a special program code for FYI voucher participants in line 2n of the Family Report (form HUD-50058) or line 2p of the MTW Family Report (form HUD-50058), as applicable. The special program code is “FYI.” PHAs must also properly record the date the PHA issues the voucher to the youth, and the date of admittance to the program in line 2a. Line 2h must be used to report the date the PHA initially admitted the youth into the program.

- 59. Can a Housing authority skip others on the PHA's waiting list not eligible for the FYI voucher to issue a FYI voucher to a waiting youth who is eligible? If that is the case, would a youth eligible for an FYI voucher receive the FYI voucher while others on the wait list, who are not eligible for this program, maintain their position and be issued a regular HCV in the order that their name appears?**

The PHA, upon receipt of a referral(s) from the PCWA of an eligible youth, must compare the name(s) with youth already on the PHA's HCV waiting list. Any youth on the PHA's HCV waiting list that matches with the PCWA's referral must be assisted in order of their position on the waiting list in accordance with PHA admission policies. Any youth certified by the PCWA as eligible and not on the HCV waiting list must be placed on the waiting list (pending HCV eligibility determination). If the PHA has a closed HCV waiting list, it must reopen the waiting list and place on the waiting list a FYI applicant youth who is not currently on the PHA's HCV waiting list. The PHA may reopen the waiting list to accept an FYI eligible youth without opening the waiting list for other applicants.

- 60. If an eligible youth is NOT currently on the HCV waiting list, could the PHA open the waiting list, place the eligible youth as #1 on the HCV waiting list, and then immediately issue the eligible youth the FYI voucher (pending approval from HUD)? Or does the Notice require that the eligible youth be placed on the waiting list like other new applicants (i.e., at the bottom of the list) and wait until they are called from the list?**

The scenarios described could be possible if there are no other youth on the waiting list that have been referred by the PCWA for FYI. While there is one HCV waiting list, by the nature of the eligibility requirements, a PHA would filter the waiting list for eligible youth that have been referred by the PCWA. In terms of youth on the waiting list, the PHA's regular policy would apply.

- 61. If the eligible youth is currently on the HCV waiting list, are they served in order of the entire HCV waiting list? For example, an eligible youth is referred from the PCWA and the youth is currently #80 on the HCV waiting list. Are individuals #1-79 on the HCV waiting list served in order and then the eligible youth as #80?**

If individuals 1-79 are not eligible for FYI, but individual 80 is, then individual 80 would be selected assuming that assistance is made available by order on the waiting list.

- 62. If the eligible youth is currently on the HCV waiting list, must the PHA remove the youth from the HCV waiting list if provided with an FYI voucher?**

PHAs must administer a single waiting list for the HCV program. If a youth is selected for FYI, they will have been selected from the waiting list for HCV assistance. If the concern is what happens at 36 months should the youth continue to need rental assistance, a PHA could adopt a waiting list preference to assist youth leaving FYI that are at-risk of homelessness.

- 63. If there are multiple eligible youth on the HCV waiting list, are they served in order of the entire HCV waiting list? For example, assume eligible FYI youth "A" is #10 on the HCV waiting list and then another eligible FYI youth "B" is #20 on the HCV waiting list. Is eligible youth "A" served after #1-9 on the HCV waitlist? And then eligible youth "B" is served after #1-19 on the HCV**

**waitlist?**

When or before the FYI vouchers is available, the PHA should review its waiting list for eligible FYI candidates and call up the first eligible candidates based on PHA policy. A PHA would not wait to serve families 1-9 with regular vouchers before serving an FYI youth if the FYI voucher is available.

**64. My understanding is once a PHA receives the referral and has an application (including screening/background check) that the PHA will issue a voucher. Does the PHA wait to reach out to HUD when they are ready to lease up? (Updated)**

It is not necessary to wait until your agency is ready to lease up before submitting your request. Per Notice PIH 2021-26, requests determined to meet the requirements of the notice will be referred to the Financial Management Division (FMD) and Financial Management Center (FMC) for further processing. The funding process is intended to result in issuance of an amended ACC to the PHA to administer the FYI voucher(s) within 60 business days.

**65. The Notice says that upon receiving a referral, the PHA compares the name to see if they are on their HCV waitlist and if not places them on the waitlist. What happens then?**

Placing a youth on the waiting list (pending HCV eligibility) ensures that each youth is assisted in the order of their position on the waiting list in accordance with PHA admission policies. PHAs should review administrative plan requirements at 24 CFR 982.54. Of particular note, 24 CFR 982.54 (d)(1) having to do with selection and admission of applicants from the PHA waiting list.

**66. Must the PHA create a preference to serve these homeless youth? What does Notice PIH 2021-26 envisions to operationalize this? (Updated)**

Yes, the PHA would create a waiting list preference for youth referred by the PCWA as eligible for the program. Unless the PHA receives more referrals than vouchers, the youth should not have to wait on the waiting list except from the point of referral to the offering of a voucher. If the PHA received 25 referrals and is awarded 25 FYI vouchers, the PHA would offer vouchers to the 25 eligible youth. The PHA may accomplish this by 1. Creating a limited preference and 2. Only opening the waiting list to youth referred by the PCWA as meeting eligibility for the program. Operationally, the following Admin Plan language is presented as an option for consideration:

The waiting list for FYI vouchers is continually open for referrals from [Insert Child Welfare Agency] as long as there are FYI vouchers available.

Applications meeting the requirements of FYI will be accepted on a referral basis provided there is funding available.

If HUD awards [insert PHA name] FYI vouchers, the [insert PHA name] will use the assistance for FYI-eligible youth only. The [insert PHA name] will maintain records showing that the youth was admitted with HUD-targeted assistance.



**67. Are all the waiting list regulations apply to these FYI vouchers? Would the PHA be out of compliance with regulations if it fails to assist eligible youths on the existing waiting list that are not referred by the PCWA? Can the PHA's admin plan specify youth are only eligible if referred by the PCWA?**

Yes. The PHA, upon receipt of a referral(s) from the PCWA of an eligible youth, must compare the name(s) with youth already on the PHA's HCV waiting list. Any youth on the PHA's HCV waiting list that matches with the PCWA's referral must be assisted in order of their position on the waiting list in accordance with PHA admission policies. Any youth certified by the PCWA as eligible and not on the HCV waiting list must be placed on the waiting list (pending HCV eligibility determination). Youth not identified and referred as eligible by the PCWA are not eligible to receive assistance under FYI/FUP.

**68. If a client that the voucher was originally intended for falls off, or does not meet the requirements, can you fill their place with another client that meets the criteria? (Updated)**

Yes, this can be done. Notice PIH 2021-26 addresses more details into this matter under the Youth Failure to Use Voucher and Turnover sections. These are excerpts from the Notice: Youth Failure to Use Voucher Should a youth fail to use the voucher, the PHA may issue the voucher to another eligible youth if one has been identified. If another eligible youth is not available, the PHA must notify HUD, and HUD will reduce the PHA's HCV assistance to account for the removal of the FYI assistance from the PHA's HCV baseline. *Turnover* PHAs must continue to use FYI vouchers awarded under this notice for eligible youth upon turnover. If another eligible youth is not available, the PHA must notify HUD, and HUD will reduce the PHA's HCV assistance to account for the removal of the FYI assistance from the PHA's HCV baseline. HUD will monitor the utilization of vouchers awarded through this notice on an annual basis and any unutilized voucher assistance that is no longer needed will be recaptured and reallocated as authorized under the 2021 Act.

**69. Are PHAs supposed to enter all FYI vouchers including the FYI TPV vouchers awarded under PIH Notice 2019-20 in VMS? (Updated)**

Yes. PHAs awarded FYI TPVs under Notice PIH 2019-20, received the following information concerning VMS reporting in their ACC letters: PHAs must maintain a special program code for FYI participants in line 2n of the Family Report (form HUD-50058) or line 2p of the MTW Family Report (form HUD-50058), as applicable. The special code is "FYITP." PHAs must also report leasing and expense information for these vouchers in the VMS, Form HUD-52681B. The "Family Unification 2008/Forward – MTW" or "Family Unification – Non MTW" category, as appropriate for your PHA, must be used. The Tenant Protection category **must not** be used for reporting in the Voucher Management System (VMS). Additional program-specific requirements are outlined in the notice.

**70. If a PHA administers an HCV program in one county and have a Foster Youth needing assistance in another county. Can the youth be assisted in another if the PHA has a partnering PCWA in the county the youth is currently in? (Updated)**

Unless an alternative requirement is provided for in Notice PIH 2021-26, FYI vouchers are administered under the requirements of the regular HCV program. Your PHA should follow its Administrative Plan and verify its ability to administer

assistance in another jurisdiction just as it would for any HCV family.

**71. We have the FYI program. I am wondering when and how we let you know if a youth is not going to utilize the voucher?**

Send notifications regarding the youth's failure to use the FYITPV awarded under Notice PIH 2019-20, to [FYITPV@hud.gov](mailto:FYITPV@hud.gov).

Copy your agency's Financial Management Center Financial Analyst, provide the names/identity of the youth and the reason why the youth did not use the voucher.

**72. My PHA received FUP Vouchers and started leasing. Do we have to submit another application to receive up to the 25 Vouchers? (Updated)**

If your agency was previously awarded FUP vouchers under the 2019 Family Unification Program Notice of Funding Availability. A request for FYI vouchers must be submitted in accordance with Notice PIH 2021-26. A sample request is attached for your convenience. More resources are available on our FYI webpage. You may access the FYI webpage at the following link: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/hcv/fyi](https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/fyi).

## Portability

**73. Can PHAs restrict portability for youths for the first year or for the full 36 months of assistance?**

Portability of a participant is handled in the same way as regular Housing Choice Vouchers (HCVs), so a PHA may not restrict or deny portability for a FYI participant for reasons other than those specified in HCV program regulations (such as restrictions on nonresident applicants under 24 CFR 982.353(c)).

**74. Does a participant that wants to move with continued assistance have to move to a jurisdiction that administers FYI?**

No. A participant does not have to move to a jurisdiction that administers FUP or FYI. The referring community would no longer have an obligation to offer supportive services.

**75. If the receiving PHA has a FUP program, may the youth move to the jurisdiction? Yes.** A participant is not prohibited from moving to a jurisdiction that administers FUP.

**76. Can a PHA absorb a FYI TPV or FYI voucher youth into its regular HCV program? (Updated)**

Yes. There is nothing that precludes a PHA from absorbing the youth into its regular HCV program if it has vouchers available to do so. If the receiving PHA absorbs the youth into its regular HCV program, that youth becomes a regular HCV participant with none of the limitations of a FYI TPV or FYI voucher. In the case of absorption, an FYI TPV would sunset under Notice PIH 2019-20. An FYI voucher issued under Notice PIH 2021-26 continues to be made available to eligible youth upon turnover.

**77. If a FYI participant ports to another jurisdiction under a billing arrangement, which PHA has the responsibility of terminating the assistance once the 36-month limit expires?**

The initial and receiving PHA must work together to initiate termination of assistance upon expiration of the 36-month limit.

**78. Our agency will be receiving an FYI voucher from another PHA. We have an MOU and are able to run the FYI program. Can the FYI voucher be absorbed into our FYI program? If so, is the paperwork process like HCV?**

Please see FAQ# 76.

## Voucher Time Limit

**79. Does the 36-month assistance limitation mean 36 months of paid HAP or 36 months on the program?**

If no subsidy (HAP) is being paid on behalf of the youth, that period of time does not count under the 36-month limitation.

**80. Is it permissible to reissue a FYI assistance for another 36 months to a youth whose voucher has reached the 36-month limit?**

No. It is not permissible to reissue another FYI voucher to the same youth upon expiration of their 36 months of FUP assistance (which includes FYI TPV and FYI voucher assistance).

**81. Can a youth be issued a regular HCV upon expiration of the 36-month limit?**

Yes. However, the youth would have to be selected from the HCV waiting list for a regular HCV. To facilitate this process, PHAs may choose to create a preference in their regular HCV program for persons whose FYI assistance is expiring and will lack adequate housing as a result of their termination from the program, or other similar category.

**82. Can the 36-month time limit on a FYI TPV or FYI voucher be waived?**

No. The 36-month time limit is a statutory requirement under Section 8(x) of the U.S. Housing Act of 1937 and cannot be waived. However, PHAs may work collaboratively with PCWAs in developing a transitional plan to help prepare youths for the eventual expiration of their 36 months of assistance. PHAs also have the option of using a preference.

**83. Do program participants age out of the program?**

No. A participant may continue with the program until they have received 36 months of assistance. The upper age limit is for entering the program.

**84. Does the assistance expire after 36 months? (Updated)**

Yes for FYI TPVs awarded under Notice PIH 2019-20. These vouchers “sunset” when the youth leaves the program. This means that the PHA cannot reissue the HCV assistance issued under this notice when the youth exits the HCV program. When the youth exits the HCV program, HUD will reduce the PHA’s HCV assistance to account for the removal of the FYI TPV assistance from the PHA’s HCV baseline inventory.

This is not the case for FYI vouchers awarded under Notice PIH 2021-26. PHAs must continue to use FYI vouchers awarded under this notice for eligible youth upon turnover.

**85. If a young person is assisted with an FYI TPV or FYI voucher but leaves the program before having received 36 months of assistance, are they eligible to participate in the program again.**

If the young person is otherwise program eligible, they may be re-admitted to the program. This does not mean that the young person is eligible for another 36 months of assistance. The young person is limited to a total 36 months of assistance under the program. For example, if the first time in the program the youth received subsidy (HAP was paid on behalf of the youth) for 24 months, the young person would be eligible to participate in the program up to another 12 months, for a total of 36 months.

**86. If the youth is participating in a PHA’s Family Self-Sufficiency (FSS) program, may the youth be assisted for longer than 36 months?**

No. A youth participating in a PHA’s FSS program is limited to the statutory maximum assistance of 36 months.

**87. Are youth who had some level of child welfare involvement, but were not in foster care, eligible to be assisted under the program.**

No. Youth eligibility is outlined in Section 7 of the notice. The PCWA must certify that the youth meets all of the following conditions:

1. Has attained at least 18 years and not more than 24 years of age;
2. Left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act; and
3. Is homeless, or is at risk of becoming homeless, at age 16 or older.

**88. Are youth sleeping in cars considered homeless?**

It is the responsibility of the PCWA to determine youth eligibility. This includes determining whether the youth meets the definition of being homeless or at risk of becoming homeless. These terms are defined at 24 CFR 578.3, and 24 CFR 576.2, respectively. The definition of homeless includes, but is not limited to, an individual or family who lacks a fixed, regular, and adequate nighttime residence, which may include a primary nighttime residence that is a public or private place not designated for or ordinarily used as regular sleeping accommodation for human beings, including a car.

**89. How will HCV administration be different than administering regular HCVs?**

The major administrative differences are outlined in Section 15 of the notice.

**90. Are FYI voucher participants eligible to participate in the Family Self-Sufficiency Program in accordance with the FUP and FSS demonstration, and can the FYI voucher assistance be extended to the length of their Contract of Participation? See FAQ # 86.**

## Terminations

**91. Under what circumstances can a PHA terminate a FYI TPV or FYI voucher?**

Termination of a FYI TPV or FYI voucher is handled in the same way as with any HCV; therefore, termination of a FYI TPV or FYI voucher must be consistent with HCV regulations at 24 CFR Part 982, Subpart L. Given the statutory time limit, a PHA must terminate the youth's voucher once the 36-month limit on assistance has expired.

## Funding

**92. Are administrative fees available for administration of FYI TPVs and FYI vouchers?**

Yes. Administrative fees are paid based on the number of units under lease.

**93. At what time does HUD determine the Per Unit Cost (PUC)?**

HUD will determine the PUC for the PHA at the time an eligible request has been received using the most recent data available to HUD.

**94. Is the maximum 25 FYI vouchers per PHA, per county, or state?**

The initial maximum award of 25 vouchers under the notice is per PHA in a fiscal year. PHAs that have been awarded the initial maximum cap of 25 vouchers in a fiscal year that have achieved at least 90 percent utilization of these vouchers may request up to an additional 25 vouchers. PHAs will not be awarded more than 50 vouchers in a fiscal year.

**95. What if the monthly award amount the PHA receives is not enough to cover the HAP payment?**

The PHA is able to return to the Financial Management Division (FMD) to request additional funding in the first year if they are projecting a higher PUC. The initial funding will allow the PHA to fund the higher rents for several months, and use the actual cost paid to request the projected shortage to the FMD, assuming 12 months of rent. The PHA, through the field office, should provide evidence of the higher rental costs and the field office must confirm the costs are reasonable. FMD will then fund the difference if the costs are found to be reasonable.

**96. What is the admin fee for each FYI voucher that the PHA would receive?**

PHAs will receive ongoing fees for FYI leased units. This happens in arrears. For example, the advance of Admin Fees to PHAs for Jan, Feb and March 2021 was based on leased units reported in September 2020. If the PHA leased up 25 FYIs in February 2021, assuming the Sept units that were leased up remain under lease, the FMC will make this

PHA whole for those 25 vouchers when we complete the March quarterly reconciliation, which will show 25 more vouchers leased. This adjustment will occur in the next Admin fee monthly advance.

## Shared Housing

### **97. May FYI TPVs or FYI vouchers be used in shared housing situations? (Updated)**

A youth assisted with a FYI TPV may share a unit with other persons assisted under the HCV program, or with other unassisted persons. For example, two FYI participants may decide to seek out a 2-br unit as a result of tight market conditions for 0-BR and 1-BR units. Such a unit consists of both common space shared by the occupants of the unit and separate private spaces for each assisted family. Additionally, after voucher issuance, the FYI voucher holder is treated the same as any other voucher holder on the PHA's program. For example, if the PHA would allow a family member to be added after voucher issuance, and the individual was otherwise eligible for assistance, the PHA could permit the individual to be added as a household member following the PHA's Administrative Plan.

## Supportive Services

### **98. Can a PHA or private non-profit provide the supportive services?**

Yes. The notice does not restrict who may provide the supportive services required under the notice. Eligibility to receive funding under the notice to administer FYI assistance requires that the PCWA provide or secure a commitment of supportive services for participating youth to assist the youth in achieving self-sufficiency. The PHA or private non-profit may provide some or all of the supportive services if it has the resources to do so. The provision of supportive services is not an eligible use of the FYI funding under the notice.

Participation in supportive services cannot be required as a condition of receipt of assistance under the notice.

### **99. If the young person enters the program at 24 years of age, does that mean that services must be offered to that person to the age of 27?**

An otherwise eligible youth may enter the program between the ages of 18 years and not more than 24 years of age. The age at which the youth enters the program does not change the requirement to provide the required supportive services.

## Prioritization

### **100. Does the notice set prioritization policies, or is this the responsibility of the community?** The notice does not set prioritization policies. Given the limited nature of FYI TPVs, the PCWA is encouraged, to consider how they are prioritizing youth for referrals. The intent of prioritization should be to ensure that youth are prioritized for housing resources and related serviced based upon level of need and appropriateness of the intervention.



**101. Are applicant required to use coordinated entry? (Updated)**

No. The CoC plays a critical role in identifying eligible youth in the community at risk of or experiencing homelessness that are no longer part of the child welfare system. Through the CoCs coordinated entry process, referrals of eligible youth to the PCWA are able to be made based on prioritization of need and appropriateness of the intervention. Further, for CoC program assistance. Youth who are part of the PCWA's active caseload do not have to be added to the CoC's coordinated entry process.

Notice PIH 2019-20

**102. My PHA received FYI TPV vouchers under Notice PIH 2019-20. Does the recently published Notice PIH 2021-26 impact these awards? (Updated)**

No. The requirements of Notice PIH 2019-20 continue to apply.

**103. Do FYITPVs remain subject to the requirements of Notice PIH 2019-20? (New)**

Awards of FYI TPVs continue to be administered under the requirements of Notice PIH 2019-20. This includes turnover requirements and the requirement to inform HUD should a youth not use a voucher or leave the program.