

## 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 March 15, 2023, HUD issued Notice PIH 2023-04. This notice replaces Notice PIH 2021-26. HUD is no longer accepting requests for FYI vouchers under Notice PIH 2021-26 or Notice PIH 2020-28. Please submit requests for FYI voucher using the [FYI Form](#).

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 (Notice PIH 2023-04). Additionally, references to “notice” are to Notice PIH 2023-04, unless specified.

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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/Opportunity (NOFA/O)?**

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

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

Yes. Administering assistance under the notice would not preclude a PHA from applying for funding under a future NOFA/O, assuming all eligibility requirements of the NOFA/O 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 for PHAs administering more than 11 FUP and/or FYI vouchers, and at least 50% for PHAs administering 10 or fewer FUP and/or FYI vouchers at the time of the request as reported in line 2n of the Family Report (form HUD-50058) or line 2p of the MTW Family Report (form HUD-50058 MTW), as applicable. Please see Section 6.B.3. of PIH Notice 2023-04 for additional eligibility requirements and specific exceptions to the utilization threshold criteria.

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 an FYI-eligible youth if that youth gives birth after she has leased up under a FYI TPV or FYI voucher? (Updated)**

The youth is still eligible for the full 36 months of assistance and for an extension of assistance in accordance with the [Fostering Stable Housing Opportunities \(FSHO\) amendments](#) (as long as the youth meets the requirements of FSHO).

(Note: FSHO only applies to FYI-eligible youth who first leased a unit with FYI assistance after December 27, 2020.)

**6. In order to qualify, must a youth 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, childcare institutions, and pre-adoptive homes.” (See 45 CFR 1355.20.)

**7. Are youth being discharged from a publicly funded 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? (Updated)**

A youth must be no more than 24 years old at the time of PCWA certification as FYI-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. If the PHA receives a referral of an FYI-eligible youth that is near their 25<sup>th</sup> birthday, the PHA should take steps to ensure that the youth does not reach the age requirement limit before the effective date of the HAP contract. PHAs are encouraged to detail the time sensitivity of the process leading up to HAP contract execution. For example, if the youth is issued an FYI voucher 45 days before their 25<sup>th</sup> birthday, they would have less than 45 days to search, as the PHA approval of the tenancy, including unit inspection, and execution of the HAP contract must be accommodated in the timeline. The PHA is encouraged to identify strategies to expedite the lease up process, such as additional unit search assistance, and prioritizing unit inspections for the FYI-eligible youth approaching their 25<sup>th</sup> birthday. HUD understands that there are sometimes barriers

outside of the young person's control that may prevent leasing with the voucher before their 25th birthday. In such circumstances, HUD encourages PHAs to explore all available options to ensure youth receive assistance. PHAs should contact [FYI@hud.gov](mailto:FYI@hud.gov) to discuss acceptable, available options if they have any questions.

**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?**

In order to maintain an audit trail, the PHA should keep the referral or certification from the PCWA.

**10. Can organizations other than PHAs 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.

**11. 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.

**12. 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](#).

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

Yes, if it does not have an FYI available to issue to the young person and meets the requirements under PIH Notice 2023-04. 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 2023-04. Only FYI TPVs sunset and cannot be used for another eligible youth. HUD is no longer issuing FYI TPVs. 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, Notice PIH 2021-26, or PIH Notice 2023-04 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 2023-04.

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](mailto:FYI@hud.gov) and the PHA's respective Financial Management Center Financial Analyst.

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

Per Notice PIH 2023-04, PHAs that have been awarded the initial maximum cap of 25 vouchers in a federal fiscal year that have achieved at least 90 percent utilization of these vouchers may request up to an additional 25 vouchers in the federal fiscal year. PHAs will not be awarded more than 50 non-competitive vouchers in any given federal fiscal year. Appropriations language in FY 2024 directed HUD to remove this cap, and HUD is in the process of updating PIH 2023-04 to implement this directive in early 2025.

**15. 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 (see Question #20).

**16. What would a PHA do under this program if the legal age 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 in accordance with a transition plan described in section 475(5)(H) 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.

- 17. 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.
- 18. 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.
- 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.
- 20. If the youth exited foster care before their 18<sup>th</sup> 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 (have not reached their 25<sup>th</sup> birthday);
  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
- 21. 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 2023-04. 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.
- 22. 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# 20 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.

**23. 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).

**24. 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?**

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.

**25. 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 FYI eligibility requirements or eligible for voucher assistance? (Updated)**

In accordance with Notice PIH 2023-04, 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.

**26. How does homeless or is at risk of becoming homeless at age 16 or older relate to eligibility for youth, 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 (have not reached their 25<sup>th</sup> birthday);
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. For FYI, HUD has defined “homelessness” to mean the population included in the definition of this term at 24 CFR 578.3 and “at risk of homelessness” to mean the population included in the definition of this term at 24 CFR 576.2.

**27. The extended foster care (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 FYI program 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.

**28. 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 2023-04, 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.”

**29. Is an FYI youth who is participating in an Extended Foster Care (EFC) program that is not funded through the Title IV-E foster care program, but is State-funded, eligible for an FYI voucher? (New)**

No. A youth must meet all FYI eligibility requirements, inclusive of the requirement to have 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. If a state considers a youth to be in Extended Foster Care, then they have not left foster care. This is regardless of whether the Extended Foster Care program is funded using Title IV-E foster care funds or State funds.

**30. Youth eligibility is listed as age 18-24 and homeless or at risk of being homeless or homeless at age 16 or older. 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? (Updated)**

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.*

**31. To be eligible for FYI, could the youth have been involved with the foster system at any age? (Updated)**

Yes. A youth's initial foster care involvement could have occurred at any age. See Question #20 and #22 for further information on age of eligibility. If a youth meets eligibility under 1, 2, and is homeless or at risk of becoming homeless, they would qualify.

**32. 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 2023-04. Then, all applicants in the household must meet the PHA's eligibility requirements.

**33. Are youth who left foster care because they were adopted eligible for FYI? (New)**

Yes, a youth who was in foster care but left foster care because they were adopted would meet the FYI eligibility requirement to have "left foster care." The youth would be eligible for FYI as long as they have a history of foster care involvement and meet the other FYI eligibility and HCV eligibility requirements.

#### Title IV-E

**34. 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 FYI? (Updated)**

Supplementing title IV-E foster care with the housing assistance under the FYI program is not a permitted use of this resource. 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.

**35. Are young people who receive title IV-E Foster Care funds without any housing support still eligible to receive an FYI voucher? (Updated)**

To receive assistance under Notice PIH 2023-04, 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. 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 FYI program is not a permitted use of this resource. If the state considers the youth in title IV-E foster care, then they have not left foster care. Please also see FAQ #34

## Application Process

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

When Congress appropriates FYI funding competitively, HUD publishes a Notice of Funding Opportunity (NOFO) on [grants.gov](https://www.grants.gov). Funding remains available for non-competitive FYI awards, and the application requirements are explained in Section 16 of Notice PIH 2023-04.

**37. 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 2023-04.

**38. 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.

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

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

**40. 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? (Updated)**

Yes. A code, alias, initials, or full name of the youth may be used in the request for assistance. Additionally, the PHA must receive certification of eligibility for the

youth from the PCWA. PHAs must use the FYI Form to submit their request(s) for FYI vouchers and send any supporting documentation (including Form HUD-52515) to [FYI@hud.gov](mailto:FYI@hud.gov).

**41. 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.

**42. 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.

**43. How can a PHA verify that it is using the most current funding application (Form HUD-52515)? What information is required? (Updated)**

PHAs submitting a request for assistance under the notice should use the newly revised form HUD-52515. The revised form has an expiration of April 30, 2026. 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. The most recent funding application (Form HUD-52515) is accessible on [HUDCLIPS](#).

**44. Does utilization impact a PHA's eligibility to request FYI vouchers in the current FY? (Updated)**

Yes, a PHA's current FYI and/or FUP utilization rate does impact the PHA's eligibility to request FYI vouchers in the current FY. 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, the "Foster Youth to Independence – HAP and Leasing" or "MTW - Foster Youth To Independence HAP Expenses After the First of the Month" category, as appropriate for your PHA. Where the PHA has a combined FYI and/or FUP (as applicable) size of no more than 10 vouchers, the PHA may request FYI vouchers if the validated VMS data reflects at least 50 percent utilization under the FUP VMS field, the "Foster Youth to Independence – HAP and Leasing" or "MTW - Foster Youth To Independence HAP Expenses After the First of the Month" category, as appropriate for your PHA. PIH Notice 2023-04 outlines additional eligibility requirements and specific exceptions to the utilization threshold criteria (see Section 6.B).

**45. How many vouchers should a PHA with previously awarded FYI vouchers lease to reach the 90% utilization? (Updated)**

PIH Notice 2023-04 outlines specific exceptions to the utilization threshold criteria with the submission of a PHA narrative (see Section 6.B). The percentage

calculation should round to the nearest whole number. For example, a PHA with an award of 25 FYI and/or FUP vouchers may request additional vouchers when it has 22 or more FYI/FUP vouchers leased.

**46. When is the submission of the FYI application due? (Updated)**

Per Notice PIH 2023-04, 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 \$25 million of the FUP appropriated amount under the 2024 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 use the FYI Form 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).

## 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?**

Yes. 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.

**52. For how long is rental assistance provided? (Updated)**

Youth may receive up to 36 months of assistance unless it's extended for up to an additional 24 months beyond the 36-month time limit, if the youth first leased a unit with their FYI voucher after December 27, 2020, and meets the requirements of the [Fostering Stable Housing Opportunities \(FSHO\) amendments](#).

**53. 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.

**54. 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 PHA's 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).)

**55. 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.

**56. 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) addresses selection and admission of applicants from the PHA waiting list.

**57. 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? (Updated)**

The PCWA must determine whether the supportive services offered meet the requirements found in Section 8 of the notice.

**58. May assistance under Notice PIH 2023-04 be project-based? (Updated)**

Yes. HOTMA added a new section 8(o)(13)(O) to the 1937 Act, that allows PHAs to project-base Family Unification Program vouchers without requiring additional HUD approval. This includes FYI vouchers awarded under Notice PIH 2023-04. All statutory and regulatory requirements that apply to the PBV program apply to vouchers awarded under Notice PIH 2023-04 that have been project-based.

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

**59. If a PHA administers FYI TPV vouchers under Notice PIH 2019-20 and FYI vouchers under Notice PIH 2023-04, how should the vouchers be recorded in PIC? (Updated)**

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 2021-26 and Notice PIH 2023-04, 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.

- 60. 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.

- 61. 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.

- 62. 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.

- 63. 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.

**64. 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.

**65. Is it true that once a PHA receives the referral and has an application (including screening/background check) that the PHA will issue a voucher when the agency is 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 2023-04, 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.

**66. 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) addresses selection and admission of applicants from the PHA waiting list.

**67. Must the PHA create a preference to serve these homeless youth? What does Notice PIH 2023-04 envision 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.

**68. Are all the waiting list regulations applied to 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 PWCA? Can the PHA's admin plan specify youth are only eligible if certified by the PWCA? (Updated)**

Yes. The PHA, upon receipt of a referral(s) 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 certified as eligible by the PCWA are not eligible to receive assistance under FYI/FUP.

**69. If a client that the voucher was originally intended for is unable to be reached and fails to use the voucher or does not meet the requirements, can a PHA fill their place with another client that meets the criteria? (Updated)**

Yes. Notice PIH 2023-04 addresses more details into this matter under the Youth Failure to Use Voucher/Turnover (see section 17.B.). These are excerpts from the Notice: Youth Failure to Use Voucher/Turnover. Should a youth fail to use the voucher, the PHA may issue the voucher to another eligible youth if one has been identified. *PHAs must continue to use FYI vouchers awarded under this notice for eligible youth upon turnover.* 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 2024 Act.

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

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.

**71. 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 2023-04, 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.

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

If your agency was previously awarded FYI vouchers under a Competitive NOFA/O or Notice PIH 2023-04 and has unleased vouchers, it can issue those vouchers and start leasing immediately. If your agency does not have any FYI/FUP vouchers available to issue or lease, a request for FYI vouchers must be submitted in accordance with Notice PIH 2023-04 via the FYI Form. Note that, in accordance with PIH Notice 2023-04, a PHA may request up to a total of 50 FYI vouchers per federal fiscal year. Note: appropriations language in FY 2024 removed this cap, and HUD is in the process of updating PIH 2023-04 to implement this guidance. 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).

**73. Can a youth who 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 has been issued an FYI voucher lease up with the voucher before they officially leave foster care? (New)**

Yes. The purpose of referring youth for FYI assistance 90 days before leaving foster care is to ensure that youth have enough time to receive a voucher and find suitable housing prior to exiting foster care. HUD recognizes that it is not always possible to align a youth’s exit from foster care with the date of their lease and that any gaps between their exit from foster care and leasing a unit may result in homelessness. Therefore, an FYI youth may lease a unit prior to officially leaving foster care in order to ensure a smooth transition from foster care to independence, as long as all requirements of the FYI program and HCV program are met. Please note that while a youth may be referred for an FYI-voucher before reaching the

age of 18, the PHA must not enter into a HAP contract on behalf of the youth until the youth reaches the age of 18.

**74. If a youth has a voucher that will expire in 9 months, can they move to a new home where a 12-month lease is required? (New)**

The PHA would need to comply with the requirement that the initial lease term must be for at least one year and the term of the HAP Contract must begin on the first day of the lease term and end on the last day of the lease term, in accordance with 24 CFR 982.309. The PHA may approve a shorter lease term in accordance with 24 CFR 982.309(a)(2). Under this regulation, a PHA may approve an initial lease term of less than one year if the PHA determines that (1) such shorter term would improve housing opportunities for the tenant and (2) such shorter term is the prevailing local market practice. In this scenario, the PHA may enter into a 9-month lease if these regulatory requirements are met and the owner agrees to the 9-month lease term.

**75. Are young adults who were in a Tribe's foster care program eligible for the Foster Youth to Independence (FYI) voucher Program? (New)**

Yes, young adults formerly in foster care under the placement and care or authority of federally recognized tribe, tribal organization or tribal consortium are eligible for FYI (assuming that they meet all other FYI and HCV eligibility requirements). Federally recognized Tribes may operate foster care programs under title IV-B and IV-E of the Social Security Act and through IV-E agreements with states. Therefore, a Tribe operating a foster care program is a Public Child Welfare Agency, or "PCWA," under the FYI program. As such, the Tribe may refer eligible young adults to a Public Housing Authority for an FYI voucher and/or may serve as the PCWA providing supportive services. State PCWAs may also refer eligible Tribal young adults to FYI and/or agree to provide the supportive services. State child welfare agencies should collaborate and partner with Tribes in order to meet the housing needs of Tribal young adults formerly in foster care.

**76. Are FYI applicants required to go through the coordinated entry process? (New)**

No. Youth cannot be required to go through the coordinated entry process in order to receive an FYI voucher. Rather, HUD encourages PHAs to partner with the Continuum of Care (CoC) to integrate into the coordinated entry process the identification, prioritization, and referral of an FYI-eligible youth not currently within the PCWA's caseload.

**77. Can PHAs use another referral agency (for example their local schools) other than their local PCWAs? (New)**

The FYI statute requires that the PCWA must certify that a youth meets the FYI eligibility requirements. Further, the FYI NOFA/Os set forth specific

responsibilities for the PCWA (such as providing or securing supportive services for FYI-eligible youth). Assuming that the PCWA provides the certification of FYI eligibility for the youth and fulfills its responsibilities under the FYI NOFO and its FYI MOU, the FYI statute does not preclude other entities from providing the referral (including the certification received from the PCWA) to the PHA.

## Portability

**78. Can PHAs restrict portability for youths for the first year or for the full time period of FYI assistance? (Updated)**

No. The PHA may not establish separate portability limitations for FYI participants. 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)).

**79. Can a PHA restrict portability of an FYI voucher while the PCWA is still providing services to the youth? (New)**

No. A PHA may not restrict or deny portability for an FYI participant for reasons other than those specified in HCV program regulations. Participation in case management is voluntary and portability cannot be restricted for this reason.

**80. 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.

**81. 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.

**82. 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 2023-04 continues to be made available to eligible youth upon turnover.

**83. 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.

## Voucher Time Limit

**84. Does the limit of assistance mean the number of months of paid HAP or the number of months on the program? (Updated)**

If no subsidy (HAP) is being paid on behalf of the youth, that period of time does not count towards the time limit of the FYI voucher, including the time limit of any extension of assistance received under the [Fostering Stable Housing Opportunities \(FSHO\) amendments](#).

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

No. It is not permissible to reissue another FYI voucher to the same youth upon expiration of their 36 months of FYI assistance (which includes FYI TPV assistance) or the expiration of any extension of assistance received in accordance with the [Fostering Stable Housing Opportunities \(FSHO\) amendments](#).

**86. Can a youth be issued a regular HCV upon expiration of the 36-month limit or the expiration of the maximum extension of assistance that the youth is entitled to in accordance with the [Fostering Stable Housing Opportunities \(FSHO\) amendments](#)? (Updated)**

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.

**87. Can the 36-month time limit on a FYI TPV or FYI voucher be waived? (Updated)**

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, a youth who first leased a unit with their FYI assistance after December 27, 2020, must receive an extension of their assistance for up to an additional 24 months beyond the 36-month time limit if they meet the requirements of the [Fostering Stable Housing Opportunities \(FSHO\) amendments](#). PHAs also may choose to create a preference

in their regular HCV program for persons whose FYI assistance is expiring and will have a lack of adequate housing as a result of the expiration of their assistance, or other similar category.

**88. 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.

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

Yes, but only 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 2023-04. PHAs must continue to use FYI vouchers awarded under this notice for eligible youth upon turnover.

**90. 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.

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

Yes. A youth participating in a PHA’s FSS program is not limited to the statutory maximum assistance of 36 months if the youth is participating in the Fostering Stable Housing Opportunities (FSHO) Amendments. Their FYI voucher may be extended for up to 24 months beyond the 36-month time limit of assistance and may not exceed a total of 60 months (see Question #111).

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

No. Youth eligibility is outlined in Section 9 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 (have not reach their 25<sup>th</sup> birthday);
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.

**93. 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.

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

**(Updated)**

The major administrative differences are outlined in Section 17 of the PIH Notice 2023-04.

## Terminations

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

**(Updated)**

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, unless it is extended under the FSHO amendments.

## Funding

**96. 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.

**97. 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.

**98. Is the maximum 25 FYI vouchers, per PHA, per county, or state? (Updated)**

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. Under PIH Notice 2023-04, PHAs will not be awarded more than 50 vouchers in a fiscal year. Appropriations language in FY 2024 removed this cap, and HUD is in the process of updating PIH 2023-04 to implement this guidance.

**99. 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.

**100. 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

**101. May FYI TPVs or FYI vouchers be used in shared housing situations?**

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

### **102. 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.

### **103. 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.

### **104. Is the partnership agreement between the PHA and PCWA required to include the party responsible to provide the required supportive services? (New)**

Yes, the partnership agreement must document who will provide the required supportive services. Notice PIH 2023-04, Section 10.B., states that the partnership agreement must list the required supportive services and the organization(s) that will provide these services. Further, the FYI Competitive Notices of Funding Opportunity (NOFOs) require that the MOU list the required supportive services to be provided by the PCWA or another agency/organization under agreement/contract with the PCWA and list the organizations to provide the services and resources.

## Prioritization

### **105. 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, 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 services based upon level of need and appropriateness of the intervention.

### **106. Are applicant required to use coordinated entry?**

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. 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

### **107. My PHA received FYI TPV vouchers under Notice PIH 2019-20. Does the recently published Notice PIH 2023-04 impact these awards? (Updated)**

No. The requirements of Notice PIH 2019-20 continue to apply to awards made under that Notice.

### **108. Do FYI TPVs 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.

## Fostering Stable Housing Opportunities (FSHO) Amendments

### General

### **109. If a PHA already has a preference to provide a regular HCV to FYI participants who still need housing subsidy at the end of the 36-month time limit, do we still have to meet the requirements of FSHO? (New)**

A PHA must comply with the requirements of FSHO and provide extensions of FYI assistance to youth who meet the requirements of FSHO. A PHA may, but is not required to, create a preference applicable to the PHA's regular HCV and/or PBV waiting lists for youth whose FYI assistance is expiring and will have a lack of adequate housing as a result of the expiration of their assistance, or other similar category. This preference would apply when the youth is no longer eligible for FYI assistance.

### Participation in a Family Self-Sufficiency (FSS) Program

### **110. Does the FYI youth have to enroll in FSS at the time of voucher issuance in order to be eligible for an extension of assistance under FSHO? (New)**

No. The FYI youth must be enrolled in FSS no later than the annual reexamination at the end of the 36-month or 48-month time period, as applicable, in order to receive an extension of assistance under the FSS provision of FSHO. However, HUD encourages youth to enroll in FSS as soon as they are offered a slot in order to maximize their time in the FSS program.

**111. Can a PHA extend an FYI voucher for more than the 24 months allowed under FSHO if the youth participating in the FSS Program receives an extension of their FSS CoP for additional two years? (New)**

No. Under FSHO, an FYI voucher may be extended for up to 24 months beyond the 36-month time limit of assistance. Therefore, the FYI voucher may not exceed 60 months, total. This time limit may not be extended even if the youth receives an extension of their FSS Contract of Participation (CoP) for an additional two years.

**112. Since FSS is a 5-year program, will the FYI youth be able to graduate before the usual 5 years, in order to have their escrow savings disbursed to them? (New)**

All FSS participants enter into a Contract of Participation that sets out the rights and responsibilities of the FSS participant and the organization administering the FSS program. While the contract lasts for five years, all FSS participants can graduate from the program sooner so long as they have achieved their goals outlined in the Contract. This applies to FYI youth as well.

**113. What is the plan for an escrow for FYI youth at non-FSS PHAs since such an important part of FSHO is to help youth build wealth? (New)**

A PHA that does not administer a Family Self-Sufficiency (FSS) program is not required to establish an escrow account for youth. As one of the goals of FSHO is to help FYI youth advance their education, improve their career and employment prospects, and build towards financial security, HUD encourages PHAs that do not currently administer an FSS program to start one by creating an FSS Action Plan pursuant to 24 CFR 984.201 and having it approved by their local HUD Field Office.

**114. If a PHA has an FSS program but our FYI partnership includes other self-sufficiency programming (including through the Workforce Innovation and Opportunity Act (WIOA)), can the PHA extend the FYI voucher so long as the youth is engaging in self-sufficiency services? (New)**

If a PHA has a Family Self-Sufficiency (FSS) program, it may only provide an FYI youth with an extension of assistance under FSHO's education, workforce development, or employment provision if the PHA was unable to offer the youth an FSS slot during their first 36 months of receiving FYI assistance. In order to receive an extension of assistance under the education, workforce development, or employment provision the youth must engage in one or more of these activities as defined in FSHO and the PHA's Administrative Plan for at least 9 months out of the 12-month period preceding the extension.

**115. What about FYI youth that leased up prior to December 27, 2020? Are they completely excluded from participating in an FSS program? (New)**

FSHO does not impact whether an FYI youth may enroll in the Family Self-Sufficiency (FSS) program. A FYI youth may participate in FSS regardless of whether they are covered under FSHO (i.e., regardless of whether they first leased a unit before or after December 27, 2020). Further, a PHA may, but is not required to, create a preference applicable to the PHA's regular HCV and/or PBV waiting lists for youth whose FYI assistance is expiring and will have a lack of adequate housing as a result of the expiration of their assistance, or other similar category. If the youth is selected for regular HCV or PBV assistance, it would allow them to continue in the FSS program after their FYI assistance has expired, regardless of whether they are covered under FSHO.

**116. For FYI youth, are PHAs required to do a five-year Contract of Participation for the youth, regardless of the time left on their FYI voucher? (New)**

Yes. FYI voucher holders have the same initial CoP duration as other FSS participants so the PHA would need to work with them to establish goals that can be met in the time they have left on their voucher. The FSHO Notice states "If the FYI youth accepts the FSS slot, the PHA must work with the youth to establish Contract of Participation goals and an Individual Training and Services Plan (ITSP) that can be accomplished *within the time period left on the FYI voucher.*" (emphasis added)

**117. In the FSHO notice, it says "If an FSS slot becomes available between the 36- and 48-month mark, the PHA must offer the slot to an FYI youth who had their voucher extended based on meeting the education, workforce development or employment requirement or one of the statutory exceptions." Is this referencing when a slot is available and the FYI is next on the list? Or is it saying if we have an opening it goes to the FYI regardless of waitlist placement? (New)**

FSHO does not override FSS program requirements or the PHA's family selection procedures outlined in its FSS Action Plan. Therefore, this language in the FSHO notice is referencing when a slot is available and the FYI youth is next on the list.

**118. Is an FYI youth who has already graduated from the FSS program at the expiration of their 36-months of rental assistance eligible to receive an extension of assistance under FSHO? (New)**

An FYI youth must be currently enrolled and in compliance with the FSS program in order to receive an extension of assistance under the FSS provision of FSHO. Therefore, a youth who has already graduated from FSS may not have their voucher extended under this provision. Further, a youth who has graduated from the FSS program would not be able to receive an extension of assistance based on the education, workforce development, or medical condition since this exception only applies to youth who cannot participate in FSS or education, workforce development, or employment activities.

## Verification of Compliance

### **119. Is an FYI youth required to enter into a contract for the education, workforce development, or employment requirement, similar to an FSS contract of participation? (New)**

FSHO did not establish any sort of contractual requirement for the education, workforce development, or employment provision. The PHA must establish policies in its Administrative Plan for the type of documentation that a youth must submit to demonstrate that they meet the education, workforce development, or employment requirement.

### **120. How can an FYI youth demonstrate that they are participating in a career pathway as defined under Section 3 of Workforce Innovation and Opportunity Act (WIOA)? (New)**

Section 3 of WIOA defines a “career pathway” as a combination of rigorous and high-quality education, training, and other services that aligns with the skill needs of the local job market. The definition of a “career pathway” sets forth specific activities that must be offered, but an individual will participate in an activity or combination of activities based on their individual education and career goals.

A PHA may consider a youth who is participating in any U.S. Department of Labor (DOL)-funded workforce development program as participating in a career pathway as defined in WIOA. DOL-funded workforce development programs that youth might be enrolled are:

- WIOA Youth formula-funded program
- WIOA Adult formula-funded program
- YouthBuild
- Job Corp
- DOL-funded pre-apprenticeship programs
- DOL-funded Registered Apprenticeship programs

A PHA may require that youth provide documentation that they were participating in one of these programs for at least 9 months out of the 12-month period preceding the extension. Such documentation may be provided by the appropriate service provider or Workforce Development Board.

### **121. Will persons with disabilities be exempt from either participation in the FSS program or meeting the education, workforce development, or employment requirement? (New)**

FSHO provides an exception for youth who are incapable of complying with the requirement to participate in FSS or engage in education, workforce development, or employment activities, as applicable, due to a documented medical condition. An FYI youth with disabilities that preclude them from meeting the FSS or education, workforce development, or employment requirement, as applicable, may certify that they meet this exception.



## Supportive Services

### **122. Did FSHO extend the amount of time that a PCWA must provide or leverage supportive services for FYI youth? (New)**

No. FSHO did not change the amount of time that a PCWA must provide or leverage supportive services for FYI youth. Youth must be offered the required supportive services for the period defined in the notice or Notice of Funding

Availability/Opportunity (NOFA/O) under which the funding was made available (i.e., 18 months or 36 months, as applicable).

## Portability

### **123. If a FYI youth ports to another jurisdiction under a billing arrangement, which PHA has the responsibility of terminating the FYI assistance once the 36-month limit expires? or, For youth who first leased a unit with their FYI assistance after December 27, 2020, which PHA has the responsibility for determining whether the youth is eligible for an extension of their FYI assistance under the [Fostering Stable Housing Opportunities \(FSHO\) amendments](#)? (New)**

The initial and receiving PHA must work together to initiate termination of assistance upon expiration of the 36-month limit. If the youth first leased a unit with their FYI voucher after December 27, 2020, the initial PHA must determine if the youth meets the requirements to receive an extension of their FYI assistance at the end of the 36-month and 48-month time periods, as applicable, in accordance with FSHO. If the youth does not meet the requirements of FSHO, then the initial and receiving PHA must work together to initiate termination of assistance. The initial and receiving PHA must also work together to initiate termination of assistance upon expiration of the maximum extension of assistance available under FSHO, if applicable.

## Project-Based Vouchers

### **124. Does a PHA that submitted a notice of intent to project-base vouchers (see PIH Notice 2017-21 Att. C) to HUD prior to the publication of the FSHO Notice, and which HUD has not yet responded to, need to amend its submission if it wishes to use the FYI exception category instead of the category that was used in its submission? (New)**

A PHA may, but is not required to, amend a submission that was sent to HUD prior to the publication of the FSHO Notice, and which HUD has not yet responded to, if it wants to use the FYI exception category instead of the category that was used in its submission. If a PHA chooses not to amend the submission when making this change, the PHA remains responsible to ensure that units project-based under the FYI exception category meet the requirements of FSHO, i.e., the units must house eligible youth receiving FYI assistance and the HAP contract must have become effective after December 27, 2020. PHAs that amend their submissions are encouraged to notify their local Office of Public Housing of the change to the FYI exception category, as a courtesy. More information on exceptions to the PBV project cap and how project-based units may qualify for this exception can be found at 24 CFR 982.54(c)(2)(ii).