

Runaway and Homeless Youth Program FAQs

The Family and Youth Services Bureau (FYSB) administers programs authorized by the Runaway and Homeless Youth (RHY) Act. These programs provide services, as defined by federal legislation, regulations, and requirements included in the Notice of Funding Opportunity (NOFO). The purpose of this document is to provide a resource for grant recipients of RHY programs in the format of frequently asked questions. Where applicable, links to resources and references to the legislation have been included in the answers.

Table of Contents

Definitions	2
Basic Center Program (BCP)	7
Transitional Living Program/Maternity Group Home Program (TLP/MGH).....	10
Street Outreach Program (SOP)	13
Applicable to all RHY Program Services	13
RHY Program Operations	16
Partnerships	17
General Technical Assistance and Training	18

Definitions

1. How does FYSB define “runaway youth” and “homeless youth”?

[RHY Act](#) [34 U.S.C. § 11279(3-4)]/RHY Rule ([45 CFR § 1351.1](#))

Runaway youth: An individual who is less than 18 years of age who absents themselves from home or place of legal residence without the permission of a parent or legal guardian.

Homeless youth: An individual who cannot live safely with a parent, legal guardian, or relative and who has no other safe alternative living arrangement.

For the purposes of **Basic Center Program (BCP)** eligibility, a homeless youth must be less than 18 years of age (or higher if allowed by a state or local law or regulation that applies to licensing requirements for child or youth-serving facilities). The primary purpose of a BCP is to provide emergency shelter and counseling services to youth 17 years of age and younger; however, if state or local law or regulation allows, RHY funding may be used to provide shelter and supportive services to youth ages 18 and over under BCP.

For purposes of **Transitional Living Program/Maternity Group Home (TLP/MGH)** eligibility, a homeless youth cannot be less than 16 years of age and must be less than 22 years of age. If a youth enters on their last day of eligibility (the day before they turn 22 years of age), they may stay in a TLP/MGH for a continuous period not to exceed 540 days or, in exceptional circumstances, 635 days.

A youth who has not reached 18 years of age on the last day of the 635-day period may, in exceptional circumstances and if otherwise qualified for the program, remain in the program until the youth’s 18th birthday. More plainly stated, if a youth enters a program at the age of 16, they may remain in the program until they are aged 18 years even if that stay exceeds 635 days.

2. How does FYSB expect RHY programs to determine if a youth is “away from home without parent/legal guardian permission”? How does FYSB want this determination documented?

Pursuant to guidance set forth in the [RHY Act](#) (34 U.S.C. § 11212(b)(3)), specific to a BCP, the program must “develop adequate plans for contacting the parents or other relatives of the youth and ensuring the safe return of the youth according to the best interests of the youth.”

The RHY Rule ([45 CFR § 1351.24\(e\)](#)) states that BCPs shall, “as soon as feasible and no later than 72 hours of the youth entering the program, contact the parents, legal guardians, or other relatives of each youth, according to the best interests of the youth.” If a program determines that it is not in the best interest of the client to contact the parents, legal guardian or other relatives of the client, the program must (i) inform another adult identified by the child; (ii) document why it is not in the client’s best interest to contact the parent, legal guardian, or other relative; and (iii) send a copy of the documentation to the grant recipient’s Federal Project Officer (FPO) for review.

3. What if a youth refuses to disclose information about their parent or legal guardian?

Consistent with guidance set forth in the [RHY Act](#) (34 U.S.C. § 11212(b)(3)), specific to BCPs, programs must “develop adequate plans for contacting the parents or other relatives of the youth and ensuring the safe return of the youth according to the best interests of the youth.” The plans should include procedures if the youth refuses to disclose information about their parent or legal guardian. Receiving BCP shelter services is voluntary, and the youth is free to leave at any time. Given the voluntary nature of the shelter services, the program is encouraged to develop strategies

for encouraging youth to disclose information about their parent or legal guardian, assuming the youth believes it safe and appropriate to do so. If a program determines that it is not in the best interest of the client to contact the parents, legal guardian, or other relatives of the client, they must (i) inform another adult identified by the child; (ii) document why it is not in the client's best interest to contact the parent, legal guardian, or other relative; and (iii) send a copy of the documentation to the grant recipients FPO for review.

4. **How is outreach defined?** RHY Rule ([45 CFR § 1351.1](#))/([45 CFR § 1351.27](#)): Outreach “means finding runaway, homeless, and street youth, or youth at risk of becoming runaway or homeless, who might not use services due to lack of awareness or active avoidance, providing information to them about services and benefits, and encouraging the use of appropriate services.” Street Outreach Programs (SOPs) are expected to conduct outreach, including low-barrier services, such as, but not limited to, providing food and personal hygiene items.

All RHY programs, including BCPs, TLPs, MGHs, and SOPs, are required to perform outreach in order to connect with individuals who are eligible to participate in the programs.

5. **What is the definition of aftercare?** RHY Rule ([45 CFR § 1351.1](#)): Aftercare “means additional services provided beyond the period of residential stay that offer continuity and supportive services to youth served by the program.” The current expectation, as identified in the RHY Rule, is that aftercare services for BCP, TLP, and MGH are provided for a minimum of three months after shelter exit from an RHY program. A youth's individual aftercare plan shall outline what the services were during their stay and the services available to them while they were in the shelter as well as the services available after shelter exit. SOPs are not required to provide aftercare.
6. **What is the clear definition of prevention?** While there is no formal definition of prevention in the RHY Act or the RHY Rule, the RHY Rule ([45 CFR § 1351.10](#)) states that the purpose of RHY program grants is “to establish or strengthen community-based projects to provide runaway prevention, outreach, shelter, and transition services to runaway, homeless, or street youth or youth at risk of running away or becoming homeless.”

Specific to BCP awards, runaway prevention is accomplished through home-based services, which may be offered before a situation where the youth is at risk of requiring emergency shelter. If a youth requires emergency shelter, prevention services may be provided at the time of shelter exit to prevent the youth from re-entering shelter and stabilizing the family. Pursuant to the RHY Act and RHY Rule, home-based services are “services provided to youth and their families for the purpose of preventing such youth from running away, or otherwise becoming separated from their families and assisting runaway youth to return to their families.” Prevention also “includes services that are provided in the residences of families (to the extent practicable), including intensive individual and family counseling and training relating to life skills and parenting” ([34 U.S.C. § 11279\(2\)](#)) ([45 CFR § 1351.1](#)).

Therefore, prevention efforts under RHY programs are achieved through voluntary home-based services and must be for the specific purpose of preventing youth from running away or otherwise becoming homeless. Youth are not required to enter emergency shelter to receive home-based prevention services.

7. **How much (ratio of funding) may be used for prevention versus shelter?** FYSB does not have a formula for detailing an allowable expense ceiling for prevention services. However, grant recipients are reminded of the requirement that RHY programs provide shelter and transitional living arrangements for eligible youth. RHY programs may not provide prevention services only.

8. **Will there be monies in the future to fund prevention-specific services?** Utilization of federal funds is dictated by the authorizing legislation. One way FYSB has prioritized prevention funding is through the RHY Act's demonstration authority ([34 U.S.C. § 11243](#)). In Fiscal Year 2023, FYSB released the RHY-Prevention Demonstration Program (RHY-PDP) NOFO to fund organizations to plan and implement prevention interventions for eligible youth. Should FYSB release additional NOFOs through this demonstration authority, or should authorization change to include broader funding opportunities for prevention services, RHY grant recipients will be notified.
9. **What are home-based services?** The RHY Act ([34 U.S.C. § 11279\(2\)](#)) defines home-based services as "services provided to youth and their families for the purpose of preventing such youth from running away, or otherwise becoming separated, from their families; and assisting runaway youth to return to their families." Home-based services include services provided in the residences of families (to the extent practicable), including intensive individual and family counseling and training relating to life skills and parenting.
10. **Are crisis calls a "home-based service"?** Grant recipients may document such calls as home-based prevention services should the youth be otherwise eligible for RHY services.
11. **How is respite defined?** FYSB does not have an official definition for respite; however, the Lifespan Respite Care Act of 2006 (Public Law 109-442) defines respite care as "planned or emergency care provided to a child or adult with a special need in order to provide temporary relief to the family caregiver of that child or adult." With temporary relief to the caregiver being the critical component of this definition, RHY programs should not provide respite care utilizing RHY funding. In other words, placing a youth in a BCP because of a parent's conflicting responsibilities, travel needs, being overwhelmed by the behavior of the youth, or because a parent or legal guardian needs a break from providing care to a youth is not a legitimate justification for seeking BCP emergency shelter services. If, however, a youth's parents or legal guardian refuses to allow the youth in the home and the youth does not have a safe alternative, or the youth indicates he or she will run away if forced to remain in the home, the youth may be considered eligible for BCP shelter services. All services at RHY programs are available to youth and young adults seeking services voluntarily.

FYSB does provide definitions for determining the eligibility of youth for receiving RHY services:

RHY Rule ([45 CFR § 1351.1](#)): Runaway youth refers to an individual under 18 years of age who absents himself or herself from the home or a place of legal residence without the permission of a parent or legal guardian.

RHY Rule ([45 CFR § 1351.1](#)): Homeless youth is an essential definition because it identifies individuals eligible to be served under the Act. Homeless youth refers to an individual who cannot live safely with a parent, guardian, or relative and who has no other safe alternative living arrangement.

For the purposes of BCP eligibility, a homeless youth must be less than 18 years of age (or higher if allowed by a state or local law or regulation that applies to licensure requirements for child- or youth-serving facilities). See question 1.

For purposes of TLP/MGH eligibility, a homeless youth cannot be less than 16 years of age and must be less than 22 years of age (unless the individual commenced his or her stay before age 22 and the maximum service period has not ended). See question 1.

- 12. Which definition—FYSB or U.S. Department of Housing and Urban Development (HUD)—takes precedence in RHY programs?** RHY programs are funded by FYSB; therefore, RHY grant recipients must comply with all requirements and definitions set forth in the [RHY Act](#), RHY Rule ([45 CFR § 1351](#)), and NOFOs. FYSB acknowledges that a youth's experience with homelessness may be fluid. One night they may be in a shelter, another night they may sleep on the street, and the next night they may be sleeping on a friend's couch. Regardless of the circumstances, eligibility for and compliance with RHY-funded services must be based on the RHY program requirements and definitions.
- 13. What are the [Four Core Outcome Areas](#) and how is each of the areas defined?** The RHY Rule ([45 CFR § 1351.30](#))/([45 CFR § 1351.31](#)) requires each BCP, TLP, and MGH recipient to collect data that demonstrates their ability to meet the performance standards described in the RHY Rule. Specifically, BCP, TLP, and MGH projects are required to measure goal attainment based on four core outcome areas: (1) social and emotional well-being, (2) permanent connections, (3) education or employment, and (4) stable housing.
- *Social and emotional well-being* means the development of key competencies, attitudes, and behaviors that equip runaway or homeless youth to avoid unhealthy risks and to succeed across multiple domains of daily life, including school, work, relationships, and community.
 - *Permanent connections* refer to ongoing attachments to families or adult role models, communities, schools, and other positive social networks that support young people's ability to access new ideas and opportunities to thrive and that provide a social safety net when young people are at risk of re-entering homelessness.
 - *Education or employment* means performance in and completion of education and training activities, especially for younger youth, as well as starting and maintaining adequate and stable employment, particularly for older youth.
 - *Safe and stable housing* refers to a safe and reliable place to call home.
- 14. Are youth eligible for shelter if they are picked up and dropped off by law enforcement?** Yes, as long as the youth meets the definition of a runaway or homeless youth and law enforcement is not mandating or requiring the youth stay in the shelter.
- 15. Can youth with a probation officer be served in a BCP utilizing FYSB funds?** The grant recipient must determine if the youth is on probation and still under the guardianship of a parent or relative or if the youth's legal guardian is the state. If the youth is on probation, not in state custody, and otherwise meets the definition of a runaway or homeless youth, the youth would be eligible for services. If the youth is on probation AND the legal guardian is a state agency, then FYSB funds cannot be used for shelter care. Grant recipients should work with their local juvenile justice agencies on an agreement to receive payment for shelter care in these situations.
- 16. Can a youth be ordered into RHY programs by a court to receive FYSB-funded BCP services?** No, RHY services are voluntary. BCP recipients should work with their local courts to develop an agreement to receive payment for shelter care in these situations.
- 17. Can a youth who has left, or absconded from, their foster care or juvenile justice placement be served by RHY grant recipients?** If a youth leaves their foster care or juvenile justice placement and seeks RHY services, RHY programs are expected to work with the child welfare

agency or juvenile justice agency to ensure the safety and stability of that youth. Specifically, the RHY Rule ([45 CFR § 1351.23](#)) states, “Grantees shall develop and implement a plan for addressing youth who have run away from foster care placement or correctional institutions, in accordance with federal, state, or local laws or regulations that apply to these situations. In accordance with section 312(b)(4) of the Act, Basic Center grantees must also develop a plan that ensures the return of runaway and homeless youth who have run away from the correctional institution.” The RHY Rule ([45 CFR § 1351.23](#)) further states, “Grantees shall take steps to ensure that youth who are or should be under the legal jurisdiction of the juvenile justice or child welfare systems obtain and receive services from those systems until such time as they are released from the jurisdiction of those systems.” As such, the statute and regulations require that RHY programs make plans for the safe return of these youth, but there are no explicit restrictions about providing care while the return is being facilitated. Additionally, RHY services and funds may be used to develop a plan for safely transitioning youth back to their child welfare placement or juvenile justice placement. Youth who run away from child welfare and juvenile justice placements are often in crisis, and crisis management is a reasonable part of a transition plan, in coordination with the child welfare or juvenile justice systems. If a BCP is providing transition services to a youth, and the youth has reached the 21-day limit in the program, the BCP may use other funding sources to keep the youth in shelter beyond 21 days.

- 18. Can a youth dropped off by child welfare, because they do not have an available home, be served utilizing FYSB funds?** If child welfare has taken custody of the youth, then RHY program funding cannot be used to provide services to the youth. The grant recipient should work with their local child welfare agency on an agreement to receive payment for shelter care in these situations.
- 19. Can child welfare use a TLP/MGH as a discharge plan for youth aging out of state care?** FYSB has no authority or guidance on how child welfare develops their discharge plans. However, the youth must meet the definition of runaway or homeless youth to be eligible for TLP/MGH services. It is not best practice for child welfare organizations to intentionally discharge a youth aging out of care into temporary housing for runaway and homeless youth.
- 20. Can a youth with a history of being in the child welfare system access FYSB-funded services?** Yes, if the youth is not currently in the custody of the child welfare system and meets the definition of runaway or homeless youth.
- 21. Can MGH programs serve young couples?** Yes, there are no restrictions in the [RHY Act](#) or RHY Rule preventing couples from receiving MGH services. Both youths would need to meet RHY eligibility requirements, and the MGH would need to ensure this arrangement would not be in violation of local, regional, and/or state laws and licensing requirements.
- 22. Can MGH programs serve fathers?** Yes, FYSB supports programs that provide services to both parents, assuming their involvement is in the best interest of the young person experiencing homelessness and their dependent child.
- 23. Is a youth eligible for shelter if law enforcement removes youth from a family situation based on safety of the youth?** Yes, if it is determined the youth is eligible for services because they are defined as either a runaway youth ([45 CFR § 1351.1](#)) or homeless youth ([45 CFR § 1351.1](#)) and until such time that child welfare takes custody of the youth (if applicable). Note, the grant recipient must comply with any notification procedures as identified in applicable licensing requirements.
- 24. What is the age range of eligibility for a SOP?** SOPs provide street-based services to runaway and homeless and street youth aged 21 years or less who are experiencing homelessness and

have been subjected to, or are at risk of being subjected to, sexual abuse, prostitution, sexual exploitation, severe forms of trafficking. SOPs may also provide supplemental outreach resources to BCP, TLP, and MGH projects. Therefore, the age ranges served by SOPs tend to align with the age ranges that service population agencies serve, as identified by the applicable RHY programs in each community.

25. Is there an opportunity to increase the age range of eligibility for BCPs to 21 years of age?

The age of eligible youth for RHY programs is defined in legislation and cannot be changed outside of congressional action. For the purposes of BCP, a homeless youth must be less than 18 years of age (or higher if allowed by a state or local law or regulation that applies to licensure requirements for child- or youth-serving facilities).

26. Are programs expected to require identification from street youth to confirm they are within the age range allowed by FYSB? No, there is no requirement in the RHY Act, RHY Rule, or associated RHY NOFOs requiring youth to provide identification. It is up to the program to ensure, to the best of their ability that the youth meets the age requirement to be eligible for RHY services. Such efforts to determine eligibility must be documented in the youth's case file.

Basic Center Program (BCP)

27. Are there any common practices, policies, procedures, or standards that BCPs use in searching for weapons and contraband? Each RHY program determines the best practices to ensure safety for runaway and homeless youth and RHY program staff. Many RHY programs consult with local law enforcement to train staff on issues of safety and identification of contraband. For specific ideas, consider posting your question to the [RHYTTAC Communities of Practice \(CoP\)](#). RHY grant recipients are encouraged to review the [National Guidelines for Child and Youth Behavioral Health Crisis Care](#) developed by the Substance Abuse and Mental Health Services Administration, which provides recommendations and best practices for children's crisis response.

28. Is there a minimum number of days a youth must be in a BCP in order for the program to "count" them as receiving residential shelter services? There is no minimum number of days a youth must be in a BCP to be counted as receiving shelter services. The maximum stay is 21 days in a BCP under FYSB funding. As indicated in the RHY Act and Final Rule, BCPs may use other funding sources to keep youth in shelter beyond 21 days.

29. Is the age range for BCP "up to 18," "exactly 18," or "through 18"? The phrase "up to 18" means until the youth's 18th birthday. In other words, BCP shelter care is intended for RHY youth 17 years, 364 days or younger. For the purposes of BCP, a homeless youth must be less than 18 years of age (or higher if allowed by a state or local law or regulation that applies to licensure requirements for child- or youth-serving facilities).

30. If a youth is 17 and 364 days when they are admitted to BCP, are they eligible for up to 21 days of service? No, once a youth turns 18 years of age, the youth is no longer eligible for BCP services unless licensing allows the BCP to serve youth age 18 years or older as part of state or local law or regulation that applies to licensure requirements for child- or youth-serving facilities. In this case, such requirements must be documented in the youth's file. BCPs are expected to begin discharge planning at intake. Case planning, even over the course of 24 hours, should focus on anticipated shelter needs, potential referrals and aftercare planning. While access to FYSB-funded shelter services ends once the youth turns 18 years of age, aftercare provisions are still allowed for the required three-month period. Note, if a grant recipient chooses to serve a youth who has turned

18 using other funds, appropriate supervision and separation of this youth from minors is still expected.

- 31. Will length of stay ever be extended beyond 21 days?** The maximum length of stay for RHY programs is defined in legislation and cannot be changed outside of congressional action. RHY grant recipients will be notified should RHY legislation change as a result of congressional action.
- 32. Does placement in a kinship home “count” toward meeting numbers of youth sheltered by BCP?** Shelter days are counted only when the runaway or homeless youth is in a BCP facility or agency-authorized host home approved by FYSB as part of the organization’s grant application. If a youth otherwise meets the definition of a runaway or homeless youth and is placed with a family member as an alternative to shelter, this placement may be identified as prevention (BCPP).
- 33. How should programs document if a youth was initially served in a BCP and then moved to aftercare?** FYSB does not provide guidance on how programs document services provided to youth served in a BCP, although all RHY-funded programs are encouraged to maintain individual case files for each youth served and to include documentation in those files that includes the nature of services provided. However, other than required documentation in the RHY-Homeless Management Information System (RHY-HMIS), FYSB leaves decisions on how to document services provided to RHY to each grant recipient. For the purposes of RHY-HMIS documentation, all BCP information should be entered in RHY-HMIS, and aftercare services are provided when a youth exits from a BCP, even if it is beyond the 21 days funded by FYSB.
- 34. Is there an opportunity to operate a BCP specifically for 18 to 24-year-old runaway and homeless young people?** No, unless the shelter-licensing unit in your state allows services to youth over the age of 17 years as part of state or local law or regulation that applies to licensure requirements for child- or youth-serving facilities, once the youth turns 18 years of age, they are no longer eligible for BCP services.
- 35. Can BCPs take court-ordered youth if funding is not FYSB-RHY?** FYSB has no authority on how programs allocate beds beyond those committed to RHY in the approved grant application. Note, expenditures for youth eligible for RHY versus non-RHY programs must be kept distinctly separate and well documented.
- 36. If a youth is in a BCP beyond 21 days, is it possible for a FPO to provide written authorization for the BCP to utilize FYSB funds to serve that youth? If so, what is the process for obtaining this authorization?** No, an FPO is not able to provide written authorization because the RHY Act establishes the maximum time a youth can reside in shelter using BCP funds. Once a youth has received 21 days of shelter care in a BCP, the grant recipients may continue providing shelter care but cannot do so utilizing RHY funding. FYSB does not have authority to waive the 21-day shelter requirement.
- 37. What if a youth needs to stay longer than 21 days in a BCP? Can FYSB funds be utilized to pay for services beyond 21 days?** Once a youth has received 21 days of shelter care in a BCP, the grant recipient may continue providing shelter care but cannot do so utilizing RHY funding.
- 38. Can a youth be “discharged for an hour or two” and readmitted later the same day in order to be eligible for additional days in the BCP utilizing FYSB funds?** The RHY Act and the RHY Rule do not provide guidance regarding a youth leaving and then being readmitted as it pertains to the 21-day limitation. BCP’s are expected to facilitate a safe and appropriate exit and not exit a youth into “homelessness.” Grant recipients must thoroughly document eligibility of RHY at each

intake and must also document a discharge plan and aftercare services. RHY programs are reminded that exiting a youth and immediately re-enrolling the youth to extend services is not the intent of RHY programs.

39. If a youth turns 18 on day ten of a BCP shelter stay, can they continue to reside in the shelter? If so, can FYSB funds continue to be utilized to provide BCP services? If not, should the youth be discharged to an adult shelter? If the youth goes into an adult shelter, can the BCP utilize FYSB funds to continue providing aftercare support and/or case management services? Once a youth turns 18 years of age, they are no longer eligible for BCP services unless shelter licensing in their state allows them to serve youth 18 years or older as part of their state or local law or regulation that applies to licensure requirements for child- or youth-serving facilities. FYSB does not recommend discharge options, as the appropriate plan varies from youth to youth. Discharge planning, which begins at intake, should include options for when the youth reaches the age of 18 years. Once a youth is discharged, whether to another program or shelter, the grant recipient is expected to provide aftercare services for up to three months after discharge from the BCP. This is true even if the youth turns 18 immediately before discharge.

40. What are allowable outreach activities for BCP? Outside of the following definition found in the RHY Rule, grant recipients are encouraged to plan and implement outreach activities that will result in identifying and attracting eligible runaway and homeless youth to receive services.

RHY Rule ([45 CFR § 1351.1](#)): Outreach “means finding runaway, homeless, and street youth, or youth at risk of becoming runaway or homeless, who might not use services due to lack of awareness or active avoidance, providing information to them about services and benefits, and encouraging the use of appropriate services.” Outreach includes low-barrier services, such as providing food and personal hygiene packs.

41. What are allowable aftercare activities for BCP? Aftercare is defined as “additional services provided beyond the period of residential stay that offer continuity and supportive services to youth served by the program” ([45 CFR § 1351.1](#)). Aftercare services must be offered and documented for a minimum period of three months. BCP projects establish an aftercare strategy with youth within 3 days of the youth receiving BCP shelter and services. Grant recipients should plan and implement aftercare activities that will give youth opportunities to make informed decisions about the support and services they need to receive, develop a plan for permanency, and identify and achieve their personal goals.

42. What are allowable prevention activities for BCP? Although there is no formal definition of prevention in the RHY Act or the RHY Rule, the RHY Rule ([45 CFR § 1351.10](#)) states that the purpose of RHY program grants is “to establish or strengthen community-based projects to provide runaway prevention, outreach, shelter, and transition services to runaway, homeless, or street youth or youth at risk of running away or becoming homeless.”

Specific to BCP grant recipients, runaway prevention is accomplished through “home-based services,” which may be offered in addition to the required emergency shelter and, as appropriate, counseling services to youth and their families ([34 U.S.C. § 11211](#)). Pursuant to the RHY Act and RHY Rule, home-based services are “services provided to youth and their families for the purpose of preventing such youth from running away, or otherwise becoming separated from their families; and assisting runaway youth to return to their families.” Prevention also “includes services that are provided in the residences of families (to the extent practicable), including intensive individual and family counseling and training relating to life skills and parenting” ([34 U.S.C. § 11279](#)) ([45 CFR § 1351.1](#)). Youth who receive home-based services are eligible for BCP shelter stays if the youth

leaves home without permission of their parent or legal guardian (runaway) or if the youth is forced to leave home and has no other safe and appropriate living situation.

Therefore, prevention efforts under RHY programs are achieved through voluntary, home-based services and must be for the specific purpose of preventing youth from running away or otherwise becoming homeless. Youth are not required to enter emergency shelter in order to receive home-based prevention services.

43. When is respite allowed for youth who would be homeless if such respite is not provided?

Generally, respite care is defined as the temporary care of an individual to provide relief for their usual caregivers. In this case, the emphasis is on the temporary nature of respite. A parent or legal guardian cannot abdicate their responsibility to provide youth shelter by intentionally bringing a youth to a BCP. If the youth is forced to leave a placement, whether that be the home of their parent or any legal guardians, and has no safe alternative living arrangement, then the youth is considered homeless and eligible to receive BCP shelter services. See question 6.

FYSB provides definitions for determining the eligibility of youth for receiving RHY services:

[RHY Act \[34 U.S.C. § 11279\(4\)\]/RHY Rule \(45 CFR § 1351.1\)](#): Runaway youth “means an individual under 18 years of age who absents himself or herself from the home or a place of legal residence without the permission of a parent or legal guardian.”

[RHY Act \[34 U.S.C. § 11279\(3\)\]/RHY Rule \(45 CFR § 1351.1\)](#): Homeless youth is an essential definition because it identifies individuals eligible to be served under the RHY Act. Homeless youth “means an individual who cannot live safely with a parent, guardian, or relative and who has no other safe alternative living arrangement.” For purposes of BCP eligibility, a homeless youth must be less than 18 years of age (or higher if allowed by a state or local law or regulation that applies to licensure requirements for child- or youth-serving facilities). For purposes of TLP/MGH eligibility, a homeless youth cannot be less than 16 years of age and must be less than 22 years of age (unless the individual commenced his or her stay before age 22, and the maximum service period has not ended).

Transitional Living Program/Maternity Group Home Program (TLP/MGH)

- 44. Do the children of youth served by TLP or MGH programs “count” toward the number of youth served by the program (e.g., if a program’s grant application says they will have eight beds, is it okay if they use four for youth and four for children of youth? Or would the grant application be interpreted to mean the program would have eight beds for RHY and additional beds for their children)?** Youth eligible for TLP or MGH services must be between 16 and 21 years of age at the time of program entry (see definition of homeless youth for further details). However, pursuant to [34 U.S.C § 11222\(a\)\(4\)](#) of the RHY Act, the “shelter facility used to carry out such project shall have the capacity to accommodate not more than 20 individuals”; therefore, the count of number of youth served in a single facility cannot exceed the combination of “eligible” youth and their dependent children. In addition, a TLP providing MGH services and standalone MGH projects must create a separate file for the young person’s infant or child. At a minimum, information contained in the file should include a record of well-care visits, sensory and developmental screenings, and assessments.

- 45. What is the minimum number of youth and young adults who can be served by a TLP or MGH?** A TLP/MGH must have the capacity to provide shelter and supportive services to a minimum of four (4) eligible homeless youth and young adults. Dependent children of youth are not factored into the minimum requirement. If a TLP/MGH had a minimum capacity of four to provide shelter to eligible youth or young adult and each had one dependent child, then the total number of individuals served is eight (8).
- 46. A youth enters a TLP, stays 6 months, and then is discharged. If the youth needs to re-enter the TLP for additional support, is the youth entitled to receive an additional 18 months of service, or is their stay limited to 12 months on the re-enrollment?** Youth who are discharged from a TLP and apply for readmission in the future may be eligible for an additional 18 months of services if the youth meets all RHY eligibility requirements. RHY programs must document policies regarding readmission of RHY and verification of eligibility of youth admitted into the program.
- 47. Can TLPs and MGHs maintain a waiting list? If so, how long can youth remain on a waiting list?** FYSB does not prescribe guidance or limitations for a waiting list or how long a youth can remain on a waiting list.
- 48. Can TLPs and MGHs use FYSB funds to provide nonresidential services to youth who do not want to access residential services?** No, TLPs and MGH provide shelter and supportive services. The only nonresidential services provided are aftercare services required for up to three (3) months after exiting residential stay.
- 49. Can TLPs and MGHs use FYSB funds to provide nonresidential services to eligible youth on a waiting list? If so, how long can youth receive nonresidential services without accessing residential services?** No, TLPs and MGH provide shelter and supportive services. TLP and MGH programs are funded for eligible youth to have access to the supportive services necessary to transition from homelessness to safe and stable living situations. FYSB funding may only be used for youth who are residents of the TLP/MGH program. Aftercare services may be provided to youth after discharge from residential services.
- 50. Can a youth be enrolled in a TLP program twice, say once for 18 months, and then come back after a period of time for an additional 18 months?** If the youth meets eligibility requirements, the youth would be eligible for a second length of stay. RHY programs are reminded that exiting a youth and immediately re-enrolling the youth to extend services is not the intent of RHY programs.
- 51. With regard to clarification on waitlists for TLP, if placement is imminent and services are needed in preparation for placement, can a TLP provide services to a youth on a waitlist?** No; services should only be provided to youth entering or already admitted to a TLP when utilizing FYSB funds.
- 52. What are allowable outreach activities for TLPs and MGHs?** Outside of the following definition found in the RHY Rule, grant recipients are encouraged to plan and implement outreach activities that will result in identifying and attracting eligible RHY youth to receive services.

RHY Rule ([45 CFR § 1351.1](#)): Outreach “means finding runaway, homeless, and street youth, or youth at risk of becoming runaway or homeless, who might not use services due to lack of awareness or active avoidance, providing information to them about services and benefits, and encouraging the use of appropriate services.” Outreach includes low-barrier services, such as providing food and personal hygiene packs.

TLPs and MGHs may use grant funds to plan and implement outreach activities that will result in identifying and attracting eligible RHY youth to receive shelter and services.

53. What are allowable aftercare activities for TLPs and MGHs? Aftercare is defined as the additional services provided beyond the period of residential stay that offer continuity and supportive services to youth served by the program ([45 CFR § 1351.1](#)). Grant recipients should plan and implement aftercare activities that will assist the youth with opportunities to make informed decisions about the support and services they need to receive, develop a plan for permanency, and identify and achieve their personal goals. Aftercare services must be offered and documented for a minimum period of three months.

54. What are allowable prevention activities for TLPs and MGHs? The RHY Act does not provide authority for TLPs or MGHs to provide prevention services.

55. What is an exceptional circumstance for length of stay of TLP and MGH and who determines that? TLP and MGH projects must provide safe and stable shelter for youth ages 16 to under 22 years of age and, if applicable, their young families who are experiencing homelessness throughout a continuous period not to exceed 540 days, or in exceptional circumstances 635 days; as an exception, a young person who has not reached 18 years of age on the last day of the 635-day period may, in exceptional circumstances and if otherwise qualified for the program, remain in the program until their 18th birthday.

EXCEPTIONAL CIRCUMSTANCES: Extenuating circumstances in which a youth would benefit from additional time in the program.

56. How should TLPs and MGHs serve youth who are 16 to 17 years of age compared with youth who are 18+? Can a 16- to 17-year-old runaway or homeless youth be housed with 18+-year-old runaway or homeless youth in TLPs and MGHs? Youth who are aged 16 to 17, who meet eligibility for TLP/MGH, should receive all services and supports mandated by the RHY Act, the RHY Rule, and in accordance with the applicable NOFO. Grant recipients must comply with local and state regulations and licensing requirements when determining if minors can be housed in the same facility as young adults.

57. If a youth enters at 21 years, 364 days old, can they remain in the program for the full 18 months? Yes. For purposes of TLP/MGH eligibility, a homeless youth cannot be younger than 16 years of age and must be less than 22 years of age (unless the individual commenced his or her stay before age 22, and the maximum service period has not ended) ([45 CFR § 1351.1](#)).

58. Do youth and young adults residing in a TLP/MGH qualify as HUD Level I homeless? According to the most recent Level 1 HUD definition, TLP/MGH youth would qualify under Category 1: Literally Homeless Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning (a) has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or (iii) is exiting an institution where the individual has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Street Outreach Program (SOP)

59. What are best practices for operating a drop-in center as a component of a FYSB-funded SOP? FYSB does not provide specific guidance on operating a drop-in center in relation to “best practices” or the development of policy and procedures for SOP operation. Grant recipients are encouraged to visit RHYTTAC to learn about current [best practices](#) in the field and participate in the RHYTTAC Communities of Practice (CoP) to leverage expertise of grant recipients currently operating successful drop-in centers. Grant recipients must ensure SOP services are NOT limited to SOP projects that support drop-in centers. SOP projects must not use the drop-in center services and supports to replace required outreach and engagement efforts. Drop-in centers are meant to enhance street outreach and engagement.

60. Can SOP services in rural areas be focused on school/community center-based outreach because youth in rural areas are not typically “on the street”? School and community outreach may be an appropriate activity to create an awareness of services; however, the purpose of a SOP is to provide street-based services to street youth and young adults who are experiencing homelessness or have left home without permission. A street youth is a runaway youth who is indefinitely or intermittently homeless and who spends a significant amount of time on the street or in other areas that increase risk to such youth of being subjected to sexual abuse, exploitation, and severe forms of trafficking (sex and/or labor). SOPs in rural areas must provide street-based services and conduct outreach in areas of the community where youth are at increased risk and to build relationships between street outreach workers and these youth to move them into safe and stable housing or emergency shelter.

61. What are allowable outreach activities for SOPs? Outside of the following definition found in the RHY Rule, grant recipients are encouraged to plan and implement outreach activities that will result in identifying and attracting eligible RHY youth to receive services. Remember outreach services for SOPs MUST include street-based outreach efforts.

RHY Rule ([45 CFR § 1351.1](#)): Outreach “means finding runaway, homeless, and street youth, or youth at risk of becoming runaway or homeless, who might not use services due to lack of awareness or active avoidance, providing information to them about services and benefits, and encouraging the use of appropriate services.” Outreach includes low-barrier services, such as providing food and personal hygiene packs.

62. What are allowable aftercare activities for SOPs? SOPs are not required by statute or regulation to provide aftercare services. Aftercare, as defined ([45 CFR § 1351.1](#)), is only required for BCP, TLP, and MGH. SOPs are required, as a program requirement in the NOFO, to provide follow-up care. Follow-up care assesses youth’s progress after receiving safety and resource referrals or engaging them in client assessments, case planning, and/or shelter. Follow-up is a form of open and active communication with youth.

Applicable to all RHY Program Services

63. What is FYSB’s expectation regarding documentation when aftercare is refused by the youth or family? FYSB does not provide specific guidance; however, most grant recipients simply state this information in the youth’s file. For the purposes of RHY-HMIS documentation for item R20, if aftercare is refused by the youth or the family, select “Client refused” as the response.

BCP, TLP, and MGH projects should begin aftercare planning for ongoing safety, stability, and access to services well in advance of the youth's exit from the program. The plan should outline the services provided to youth during and available after exit from shelter, including physical and behavioral health care, education and job training/placement services, counseling, and life skills training.

- 64. How does FYSB define supportive services?** Supportive services are services that address the special needs of youth and young adults served by an RHY program. Supportive services include the broad scope of requirements detailed in the Comprehensive Youth Centered Services Model in each program NOFO but may also include assistance with, but not limited to, obtaining identification, legal services, victim services, childcare services, and transportation services.
- 65. Can RHY programs serve youth under the age of 18 and over the age of 18 years in the same facility?** Such placement (serving youth over 18) is only authorized if permitted by state licensing. Grant recipients must detail applicable safety and supervision policies for all youth served in the same facility.
- 66. Can youth released from jail be served in an RHY program?** Yes, as long as the youth is not court ordered into services, is not a ward of the state, and otherwise meets the definitions of runaway or homeless.
- 67. Is there an expectation that the program offer aftercare services a certain number of times after an initial refusal to accept?** Aftercare services are to be provided for at least three months after the youth exits an RHY program. FYSB does not provide guidance on the number of times to offer these services after the initial refusal to accept.
- 68. How is coordinated entry intended to work for youth?** The intent of coordinated entry is to standardize and streamline the process for individuals', including youth and young adults, access to homelessness-dedicated resources across the entire homelessness crisis response system and to lower the overall burden to receive needed housing and supportive services. This process allows a Continuum of Care (CoC), to allow decisions to be made based on the availability of resources across an entire community, not just at an individual program or project, expanding an individual's access to needed community resources. A youth-inclusive coordinated entry process requires CoCs to implement a systems-level, youth-focused approach for youth access, screening and assessment, prioritization, and referral to housing and supportive services. If an RHY grant recipient is not currently engaged in their local CoC's coordinated entry process, RHY grant recipients are encouraged to contact their local CoC to learn more about the specifics of their community's coordinated entry system. CoC contact information can be found on the [Department of Housing and Urban Development's website](#).

Coordinated entry must ensure confidentiality of the records/information of minors—youth under the age of majority cannot sign a release of information for their personal data to be shared openly across the CoC. The information with coordinated entry should only be shared with CoC members/organizations that serve youth. Coordinated entry should work the same for youth as others, with the exception of the confidentiality and signing-for-self for youth under the majority. Youth, by definition, should be a priority.

- 69. How do RHY programs ensure confidentiality of minors receiving services in a coordinated entry system?** Pursuant to [45 CFR § 1351.21](#) of the RHY Rule, no records containing the identity of individual youth, including, but not limited to, lists of names, addresses, photographs, or records of evaluation of individuals served by an RHY program, may be disclosed or transferred to any

individual or to any public or private agency without the consent of the youth and parent or legal guardian, with the exception of disclosing records to a government agency involved in the disposition of criminal charges and disclosing de-identified records to an agency for compiling statistical records. Each RHY program should provide guidance to their local CoCs about the RHY program's confidentiality requirements in accordance with the RHY Act and RHY Rule. CoCs should then revise their specific regulations, policy, and procedures for protecting the confidentiality of minors to ensure they are consistent with the RHY program if working with RHY recipients in coordinated entry systems.

- 70. Are all RHY program types required to address the four core outcome areas (safe and stable housing, permanent connections, education or employment, and social and emotional well-being)? Is there written guidance on how each program type is expected to address each of these?** No, by RHY Rule, only BCP, TLP, and MGH programs are required to address the four core outcome areas. SOP grant recipients are strongly encouraged to build program models that are responsive to the four core outcome areas, and all grant recipients are required to identify the ways their RHY program will address the requirements in their grant proposal. Once funded, recipients are required to provide services as proposed and document the effect of such services as applicable and feasible, given the type of services provided to each youth.
- 71. Can undocumented minors access RHY program services without RHY staff being required to contact Immigration and Customs Enforcement?** The RHY program does not collect information on youth's immigration status.
- 72. Are RHY staff mandated reporters of abuse, neglect, abandonment, etc.? If so, what documentation does the FYSB expect programs to maintain to prove a report was made?** Each state has their own laws regarding reports of abuse, neglect, and abandonment. Grant recipients must comply with all local, regional, and state laws regarding documenting and reporting abuse and neglect.
- 73. How do RHY programs classify services beyond aftercare?** FYSB requires BCPs, TLPs, and MGHs to provide aftercare services for a minimum of three months after the runaway or homeless youth has exited residential services. RHY programs can provide aftercare services beyond the three months as there is not a maximum length of time aftercare services can be provided to youth who have exited residential services. Such services must be documented in the youth's file and directly tied to an aftercare plan, which must also be included in the youth's file.
- 74. How long can youth receive prevention services?** The RHY Act, RHY Rule, and NOFO do not provide a limitation on length of time youth can receive prevention services. All services are to be provided to eligible youth and documented in the youth's file.
- 75. What is the difference between aftercare and follow-up?** Aftercare is defined in the RHY Rule and means "additional services provided beyond the period of residential stay that offer continuity and supportive follow-up [services] to youth served by the program." ([45 CFR 1351.1](#)). Follow-up is the act of checking in on the current status of a youth who has been discharged from a program.
- 76. What are examples of aftercare?** Aftercare services can include the provision of individual, group, or family counseling; support in job- or education-related services; connections to health care services, etc. Anticipated and provided aftercare must be documented in the aftercare plan and in the client's file.

- 77. Does prevention apply to BCP, TLP, and MGH programs?** TLP and MGH programs do not have a prevention component. Home-based services, offered for the purpose of preventing a youth from running away or becoming homeless, is an appropriate and applicable prevention strategy for BCP.
- 78. What are examples of safe and stable housing?** Safe and stable housing refers to a safe and reliable place for the youth to call home. This will vary from youth to youth as their situations and options will also differ. It is incumbent on the grant recipient to detail why a placement at discharge meets the goal of safe and stable housing.
- 79. In some states, RHY programs are required to notify juvenile court when a youth enters a shelter. Does this notification requirement prevent RHY programs from providing services to runaway and homeless youth?** No, as long as such notification does not correlate to custody or court order. Such requirement and notification must be documented in the program's policies and procedures and in the client's file.

RHY Program Operations

- 80. What is the requirement related to background checks for RHY staff and volunteers?** RHY Rule ([45 CFR § 1351.23\(i\)](#)) requires complete background checks for all paid and nonpaid staff who have regular and unsupervised contact with youth, as well as for all adult occupants of host homes. Required background checks include:
- State or tribal criminal history records, including fingerprint checks
 - FBI criminal history records, including fingerprint checks, to the extent the FYSB determines this to be practicable and specified in the NOFO
 - Child abuse and neglect state registry check, to the extent the FYSB determines this to be practicable and specified in the NOFO
 - Sex offender registry check
 - Any other checks required by state law
 - Conduct checks as appropriate to job function—education credentials and employment experience, driving record, and professional license
 - Documentation of justification for hire where an arrest, pending criminal charge, or conviction is present
- 81. If local or state laws and regulations conflict with FYSB requirements, federal legislation, and/or the RHY Rule, how do RHY programs resolve the conflict?** As a general principle, federal laws and regulations preempt state laws and regulations. This principle comes from the Supremacy Clause of the U.S. Constitution. The Supreme Court has explained that “any state law, however clearly within a state’s acknowledged power, which interferes with or is contrary to federal law, must yield” (*Grade v. National Solid Wastes Management Association*, 505 U.S. 88; 108 [1992]).

If a state law is in direct conflict with a federal statute, the federal law prevails. This is also the case if the state law is in conflict with a federal regulation or federal guidance, such as might be found in an FAQ or NOFO, as that guidance is an interpretation of federal law and gains its force from the underlying federal law.

Where the federal law explicitly defers to state or local law, as the RHY Act does at [34 USC § 11279\(3\)\(A\)\(i\)](#) (regarding the maximum age of youth served in BCPs) and [34 USC § 11212\(b\)\(2\)\(A\)](#) (regarding the maximum capacity of shelters in the BCP), then it is appropriate to

follow the state or local law.

Failure to adhere to FYSB requirements enumerated in statute, regulation, guidance, or NOFO may result in a disallowance or eventual termination of the grant.

82. If a state has a regulation that requires or allows shelters to provide services to youth up to 19 years of age in order to be licensed, can the BCP utilize FYSB funds to provide services for youth 18 and older? If not, can the BCP continue to provide residential services to the youth utilizing other funding? Yes, if a shelter licensing unit in your state allows youth 18 years and older, as part of state or local law or regulation that applies to licensure requirements for child- or youth-serving facilities, then the shelter is permitted to use RHY funds to provide services to such youth up until they are less than the higher maximum age indicated in the licensure requirements. In other words, if the maximum age indicated in the license is 19 years old, the shelter can provide services until the youth turns 19 years old but not beyond.

83. How does FYSB recognize the difference between rural and nonrural programs? FYSB does not have specific definitions of rural and urban. The U.S. Census Bureau defines the terms as follows (U.S. Census Bureau, *Geography Reference: Urban and Rural*, from <https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural.html>).

The U.S. Census Bureau identifies two types of urban areas:

- Urbanized areas (UAs) of 50,000 or more people
- Urban clusters (UCs) of at least 2,500 and less than 50,000 people
- “Rural” encompasses all population, housing, and territory not included within an urban area.

HUD defines rural as follows (U.S. Department of Housing and Urban Development, *Rural Housing and Economic Development*).

- A place having fewer than 2,500 inhabitants
- A county or parish with an urban population of 20,000 inhabitants or less
- Any place with a population not in excess of 20,000 inhabitants and not located in a Metropolitan Statistical Area.

Partnerships

84. What are best practices for establishing and maintaining strong working relationships with a McKinney-Vento liaison to meet the needs of RHY?

Make contact. Reach out to introduce yourself to the local homeless education liaison for the school district(s) in your area. You can find local liaison contact information by clicking on your state on the map at <https://nche.ed.gov/data/> and then by clicking on the liaison directory link on your state’s page.

Look for common ground. Both the McKinney-Vento Act and RHY Act include requirements for local liaisons to collaborate with RHY grant recipients and vice versa. Explore these requirements and other program goals with your school or RHY partner. Look for and discuss ways each of you can help support the other’s program goals. Commit to specific action steps to advance the partnership and each of your respective program goals and client outcomes moving forward.

Keep it up. Commit to communicating at regular intervals to check in with each other about your work and joint initiatives. Assess progress on agreed-upon action steps and set the course for how you will continue to advance the collaboration moving forward.

- 85. Who can RHY programs contact when challenges arise and a McKinney-Vento liaison is unsuccessful or unable to provide services to runaway and homeless youth eligible for RHY (e.g., difficulty with enrollment in their home school, challenges in accessing transportation)?** If an RHY grant recipient is working with a young person and experiences challenges in working with the school district, and local discussions have not resolved the issue, the school or RHY grant recipient may contact the State Coordinator for Homeless Education to request assistance in resolving the issue. State Coordinator contact information can be accessed by clicking on the state at the [National Center for Homeless Education](#) (NCHE). If the issue is still unresolved after speaking with state-level contacts, the school and/or RHY grant recipient may contact the NCHE at 1.800.308.2145 or homeless@serve.org.
- 86. What are best practices for establishing and maintaining strong working relationships with child welfare personnel to meet the needs of RHY?** RHY programs are encouraged to meet with local child welfare administrators and personnel to ensure understanding of the services of the RHY program and which youth are eligible for RHY services. Inviting child welfare workers to RHY trainings and attending training offered by child welfare agencies can increase the shared understanding of terminology and responses to community needs. Partnering with child welfare agencies to address shared community concerns, such as homelessness and trafficking, can build the partnership, which benefits all involved when challenges arise.
- 87. How can RHY providers address apathy regarding youth in local communities?** RHY providers are in an excellent position to educate community members on the needs of runaway and homeless youth and how communities can play a role in helping youth. Apathy often evolves from a lack of information or misinformation. Sharing your knowledge regarding youth is a helpful first step.
- 88. Can FYSB and HUD work together to identify data/reporting/eligibility requirements?** FYSB and HUD are working together to identify solutions to challenges related to multiple aspects of service provision and data reporting. Grant recipients will receive updated information as it becomes available.

General Technical Assistance and Training

- 89. How does FYSB utilize the Performance Progress Report (PPR)?** FYSB utilizes the PPR to determine whether grant recipients are implementing the goals, objectives, and activities as described in an approved grant application. Grant recipients will be monitored based on their compliance with these performance standards and measures. FPOs utilize the PPR to determine whether a program has issues with noncompliance and requires a corrective action plan (CAP) to include technical assistance to support the program in getting back on track with their stated goals and objectives. Grant recipients' performance on these standards may also be used when deciding which RHY applications to include in future funding opportunities. As a reminder, the PPR is due semi-annually on April 30 (reporting period of October 1–March 31) and on October 30 (reporting period of April 1–September 30). There is a Final PPR due 90 days after the end of the entire project period, usually December 30.
- 90. Is there a tip sheet or one-page document of the programmatic requirements (legislative, regulatory, FYSB-specific, RHY Rule) for each program type?**

[RHY Rule Factsheet](#)

[RHY Rule](#)

91. Is there a tip sheet or one-page document on the Families First Prevention Service Act and how it impacts RHY programs? **No, there is no Tip Sheet on how the Families First Act impacts RHY programs.** Please visit the Children's Bureau website for more information and resources about the [Families First Prevention Act](#).
92. Where can I learn more about how RHY programs can access services and supports from the Department of Education's TRIO Education Programs for eligible youth? Visit the U.S. Department of Education, Office of Postsecondary Education's Federal TRIO Programs ([TRIO Home Page \(ed.gov\)](#)).
93. How can I contact my local U.S. Department of Housing and Urban Development Continuum of Care? Visit the U.S. Department of Housing and Urban Development; [HUD Exchange](#) to identify your CoCs point contact information.
94. Where can I learn more about U.S. Department of Housing and Urban Development's Youth Homelessness Demonstration Project Grant? Visit the U.S. Department of Housing and Urban Development HUD Exchange (<https://www.hudexchange.info/programs/yhdp/>).
95. How do grant recipients access the Community of Practice? The Community of Practice (CoP) site is a meeting place that provides FYSB-funded RHY grant recipients with opportunities to participate in discussion forums, view member profiles, peruse the photo gallery, store files, and more.

To learn more and to register, visit RHYTTAC's website (<https://www.rhyttac.net/>) or click on link below:

<https://www.rhyttac.net/elearning-community-of-practice>

96. Where can I find a list of all mandated services for RHY programs?
- RHY Rule
 - <https://www.acf.hhs.gov/fysb/law-regulation/runaway-and-homeless-youth-program-regulations>
 - Approved Grant Applications
 - FYSB Website (<https://www.acf.hhs.gov/fysb>)
 - Program Fact Sheets (Basic Center, Street Outreach, Transitional Living, and Maternity Group Home)
 - <https://www.acf.hhs.gov/fysb/resource/bcp-fact-sheet>
 - <https://www.acf.hhs.gov/fysb/resource/sop-fact-sheet>
 - <https://www.acf.hhs.gov/fysb/resource/tlp-fact-sheet>
 - <https://www.acf.hhs.gov/fysb/resource/mgh-fact-sheet>
 - Each fiscal year's New Grantee Orientation Webinar can be found on RHYTTAC's [eLearning site](#)
97. Do all staff of an RHY program need to be trained on all required training topics? For example, one of the required topics is fiscal management. This topic may not be relevant for direct care workers. How do I know which employees need to complete which trainings?

FYSB requires training for all staff of an RHY grant recipient but does not require all staff be trained on the same topics. These trainings are outlined in the NOFO under the *Training Plan* section for BCP, SOP, TLP, and MGH as well as in the RHY Rule. Many of these topics are addressed in the eLearning selections available to RHY grant recipients. Webinars, Technical Assistance clinics, and conference sessions also address these topics. Please consult the NOFO(s) under which you are currently funded for the full list of topics.

These topics are also in addition to any training areas required by your organization (e.g., universal precautions, confidentiality, CPR). Employee files should document that each of the required training topics has been addressed either via orientation or ongoing training opportunities.

Document the required FYSB training in personnel files, as such training relates to the roles and responsibilities of each staff person.

- 98. If training requirements are already included in an organization's standard operating procedures, should the training topics be repeated to meet FYSB requirements?** If RHY staff received previous training already required by your organization that falls under the FYSB-required training topics, personnel files should include documentation of those trainings, including date, topic, and presenter or source of training.
- 99. What is the training expectation for new hires? Is it sufficient to offer training on all topics annually?** Projects must ensure that all paid and volunteer workers are trained on the core competencies of youth workers necessary to carry out the objectives and activities of the project. Many of these topics are addressed in the eLearning selections available to RHY grant recipients. Webinars, TA clinics, and conference sessions also address these topics. Additional training topics are included in the NOFO applicable to each funded RHY program. Orientation for new hires, including the number of hours and training topics addressed, must be documented in each staff member's file. Additional training must be offered on an annual basis and likewise documented.
- 100. Does each required training topic need to be covered individually, or is there one module that covers all relevant topics for on-boarding purposes?** Training is offered in various ways to include self-directed participation in eLearning, individual coaching, facilitated webinars, group trainings, as well as local, state, regional, and national training opportunities. Grant recipients have flexibility in how training requirements are addressed, as long as the completion of training requirements is documented.
- 101. Does each member of my staff need to complete an application to the eLearning site, or can that be done in bulk or perhaps set up with one agency-wide login?** All eLearning participants must register individually, which requires a login on the RHYTTAC site and creation of a user profile. Once users complete their profile, they will be able to explore the platform Course Catalog and enroll in courses.

eLearning accounts cannot be set up with one agency-wide login, as only those with individual accounts will be able to print a certificate of completion. Individual accounts also allow participants to track completed courses, and the system will provide access to a transcript for documentation. Those with individual accounts are also able to stop and restart a course, should they need to do so. The platform will automatically save progress and allow users to return to the same location in the course the next time they access that course. Users can exit a course as many times as they need without having to start the course over from the beginning. Users can also enroll or unenroll in any course at any time, as many times as they need.

- 102. Will FYSB provide a more thorough document to assist grant recipients in preparing for monitoring?** The onsite monitoring instrument (OMI) is a tool used by FYSB to conduct site visits with funded RHY programs to provide guidance on requirements. Grant recipients should refer to the approved grant narrative and program requirements in preparation for a site-visit.
- 103. How long is it necessary to keep client records?** FYSB does not have a requirement regarding the length of time client records must be kept. However, youth have a right to review their records, and RHY programs are encouraged to ensure written policies and procedures exist and that such policies and procedures are in compliance with applicable licensing requirements. At a minimum, please note that during monitoring visits, FYSB may ask for files on any youth served in the current funding cycle and such files must be available.
- 104. How does an RHY program make changes to an approved budget?** Grant recipients should submit their request in writing to the assigned RHY FPO. If the change is within an approved scope of service and within an allowed percentage, the project specialist may be able to approve the change. Certain funding requests require a budget amendment with approval from the U.S. Office of Grants Management. The project specialist can walk a grant recipient through the process and define what is allowed.