

Appendix C | Summary of Revisions to the Administrative Plan

Indicates policy has been added

~~Indicates policy has been removed~~

Foster Youth to Independence Referral

Reason for the Change to 4.3.C Selection Method

This section was updated to include referral information for the new Foster Youth to Independence (FYI) voucher program.

4.3 SELECTION FOR HCV ASSISTANCE

4.3.C SELECTION METHOD

(iii) Foster Youth to Independence (FYI) Referral (75 Points) – Youth between the ages of 18 and 24 with a current or prior history of child welfare involvement referred by a partnering public child welfare agency.

~~(iv)~~ **Palo Alto Set Aside Referral (75 Points)** – Homeless students referred by Palo Alto Community College who are currently enrolled in at least six (6) credit hours at Palo Alto College in a degree or certificate program.

~~(iv)~~ **5-Year Mainstream Participants (75 Points)** – 238 applicant families on the tenant-based voucher waiting list, who have a household member between the ages of 18 and 61 with a disability, will be certified and referred by a designated social service agency currently partnered with Opportunity Home.

~~(vi)~~ **Opportunity Home Program Displacement (70 Points)** –

(A) Participants in “good standing” at a Opportunity Home public housing community or a Opportunity Home housing assistance program who will be displaced through no fault of their own; or



(B) Participants in the Project-Based Voucher program who require an emergency transfer through Violence Against Women Reauthorization Act of 2013 procedures [24 CFR 983.261].

(vi) **Voucher Program Return (40 Points)** – Former participants under the tenant based Housing Choice Voucher Program whose assistance was terminated because Opportunity Home did not have sufficient federal funding to continue to provide rental assistance.

FY2013-2 Simplified Earned Income (EID) MTW Activity Closeout

Reason for the Change to 6.1 Annual Income

Language was updated to reflect the close out of FY2013-2 Simplified Earned Income (EID) MTW Activity. FY2024-1 simplifies traditional EID rules beyond those of FY2013-2.

6.1 ANNUAL INCOME

6.1.E EARNED INCOME DISALLOWANCE [24 CFR 960.255; Streamlining Final Rule (SFR) Federal Register 3/8/16]

(ii) Per MTW Activity ~~“FY2013-2: Simplified Earned Income Disregard (EID),”~~ “FY2024-1: Elimination of Earned Income Disregard,” Opportunity Home will not disregard earned income for MTW participants using the traditional EID calculation.

Reinstatement After Termination

Reason for the Change to 12.2 Approach to Termination Assistance



This section was updated to clarify that Opportunity Home will only consider requests for reinstatement made within one year of a family's termination. This language is added to align with the one year appeals deadline in the court of law.

12.2 APPROACH TO TERMINATION OF ASSISTANCE

12.2.F TERMINATION NOTICE

- (4) When Opportunity Home initiates a termination, Opportunity Home will send the family a notice of intent to terminate assistance at least 30 calendar days prior to the effective date of the termination, except when the termination is for:
 - (a) An eviction, or
 - (b) Vacating without notice.
- (5) When Opportunity Home initiates a termination because the family vacated or was evicted from the unit, the notice of intent to terminate will be sent immediately upon receiving notice of the program violation.
- (6) Opportunity Home will also send forms HUD-5380 and HUD-5382 to the family with the termination notice.
- (7) When a family requests to be terminated from the program they must do so in writing to Opportunity Home (see Section 12.1.C). Opportunity Home will send a confirmation notice to the family and the owner no later than the termination effective date (as requested by the family).
- (8) If the family does not request a hearing to appeal their termination within 10 business days, Opportunity Home will send the owner/landlord a final notification of termination.
- (9) Opportunity Home will only consider requests for reinstatement to the program made within one year of termination.

Foster Youth to Independence (FYI) Vouchers

Reason for the Change to Chapter 20

Opportunity Home is acquiring up to 25 vouchers through the Foster Youth to Independence (FYI) initiative. These FYI vouchers provide housing assistance on behalf



of youth referred by a public child welfare agency (PCWA) who are at least 18 years and not more than 24 years of age (have not reached their 25th birthday) who 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 are homeless or are at risk of becoming homeless at age 16 or older. Youth must be provided supportive services to assist the young person on their path to self-sufficiency.

CHAPTER 20: EMERGENCY HOUSING VOUCHERS SPECIAL PURPOSE VOUCHERS

20.2 FOSTER YOUTH TO INDEPENDENCE (FYI) VOUCHERS

20.2.A OVERVIEW

- (1) Through the Foster Youth to Independence (FYI) initiative, HUD provides Housing Choice Vouchers (HCVs) for youth eligible under the Family Unification Program (FUP).
- (2) On September 3, 2021, HUD issued Notice PIH 2021-26, which described HUD's funding and availability of FYI vouchers and set forth the operating requirements for PHAs that administer them. The FYI Program is for youth with a current or prior history of child welfare involvement.
- (3) The Further Consolidated Appropriations Act, 2020 (Public Law 116-94), enacted on December 20, 2019, provides that up to \$10 million shall be available on a non-competitive basis to PHAs that partner with public child welfare agencies (PCWAs) for FUP-eligible youth under Section 8(x) of the U.S. Housing Act of 1937 (42 U.S.C. 1437f(x)).
- (4) All applicable nondiscrimination and equal opportunity requirements apply to FYI vouchers, including requirements that the PHA grant reasonable accommodations to persons with disabilities, effectively communicate with persons with disabilities, and ensure meaningful access for persons with limited English proficiency (LEP).
- (5) Except as addressed by this chapter and as required under federal statute and HUD requirements, the requirements of the HCV program apply to FYI vouchers.

20.1.A PROGRAM ADMINISTRATION

(1) Term of Assistance

- (a) FYI vouchers may only be used to provide housing assistance for youth for a maximum of 36 months.
- (b) Youth may be eligible to receive an extension of their voucher assistance for up to 24 months beyond the 36 month time limit if they:

- i) Participate in an FSS Program;
 - ii) Are unable to enroll in an FSS program, but are engaged in education, workforce development, or employment activities for at least 9 months of the 12-month period preceding the extension;
 - iii) If they are responsible for the care of a dependent child under the age of six or for the care of an incapacitated person; regularly and actively participating in a drug addiction or alcohol treatment and rehabilitation program;
 - iv) Are incapable of complying with the requirement to participate in an FSS program or engage in education, workforce development, or employment activities, as applicable, due to a documented medical condition.
- (c) Families cannot be required to participate in the FSS program as a condition of the FYI voucher program.

(2) Rent Calculation

- (a) Participants admitted to this program will follow the Agency's alternative implementation of small area fair market rents as established under FY2019-1: Local Small Area Fair Market Rent (SAFMR) Implementation.
- (b) See 6.3.A(2)(c) for rent calculation requirements under the program.

(3) Youth Eligibility

- (a) The partnering public child welfare agency (PCWA) is responsible for certifying that the youth:
 - i. Has attained at least 18 years and not more than 24 years of age at the time the PCWA certifies them eligible or at the execution of the HAP contract;
 - ii. 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;
 - iii. Is homeless or is at risk of becoming homeless at age 16 or older.
- (b) Eligibility is not limited to single persons. Opportunity Home may not exclude pregnant or parenting youth from service. Any pregnant or parenting youth who otherwise meets the definition of youth must be served.

(4) Organization of the Waiting List



- (a) Opportunity Home, upon receipt of a referral(s) from the PCWA of an eligible youth, must compare the name(s) with youth already on the HCV waiting list.
- (b) Any youth on the Opportunity Home 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 Opportunity Home admission policies.
- (c) 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).
- (d) If the Opportunity Home has a closed HCV waiting list, it must reopen the waiting list and place on the waiting list an FYI applicant youth who is not currently on the Opportunity Home HCV waiting list.
- (e) Opportunity Home may reopen the waiting list to accept an FYI eligible youth without opening the waiting list for other applicants. The requirements at 24 CFR 982.206 for giving public notice when opening and closing the waiting list apply.
- (f) Opportunity Home may establish waiting list preferences.

- i) Opportunity Home will establish a waitlist preference for FYI voucher referrals from a PCWA (see 4.3.C).

(5) **Reexaminations**

- (a) Annual reexaminations must be conducted for extended FYI vouchers at the end of the 36 month time period and the 48 month time period (see 2.1.A).

(6) **Partnering Agencies**

- (a) Opportunity Home must enter into a partnership agreement with a PCWA that may take the form of a Memorandum of Understanding (MOU) or letter of intent.

- i) Opportunity Home has entered into an MOU with PCWA, Texas Department of Family and Protective Services (DFPS).

(7) **Supportive Services**

- (a) PCWAs partnered with Opportunity Home must provide supportive services for participating youth to assist them in achieving self sufficiency. Supportive services must be made available for a period of 36 months to eligible youth receiving this assistance. At a minimum, the following supportive services must be offered:
 - i. Basic life skills information/counseling on money management, use of credit, housekeeping, proper nutrition/meal preparation; and

access to health care (e.g., doctors, medication, and mental and behavioral health services).

- ii. Counseling on compliance with rental lease requirements and with HCV program participant requirements, including assistance/referrals for assistance on security deposits, utility hook-up fees, and utility deposits.
- iii. Providing such assurances to owners of rental property as are reasonable and necessary to assist eligible youth to rent a unit with a voucher.
- iv. Job preparation and attainment counseling (where to look/how to apply, dress, grooming, and relationships with supervisory personnel, etc.).
- v. Educational and career advancement counseling regarding attainment of general equivalency diploma (GED); attendance/financing of education at a technical school, trade school or college; including successful work ethic and attitude models.

(8) Terminations [24 CFR Part 982, Subpart L]

- (a) Opportunity Home must terminate the FYI voucher once the 36-month time limit on assistance has expired.
 - i. FYI vouchers extended in accordance with 2.1.A for either 48-months or 60-months, dependent on continued FSS program compliance and HCV program eligibility, must be terminated once the time limit on assistance has expired.
- (b) Termination of an FYI voucher must be consistent with HCV regulations outlined in Chapter 12.

(9) Portability [24 CFR 982.353(c)]

- (a) Portability for an FYI youth must be consistent with HCV regulations outlined in Chapter 10.