**INTRODUCTION**

PHAs may but are not required to administer certain types of special purpose vouchers.

**☑ Decision Point: Will the PHA administer any special purpose vouchers?**

### Things to Consider

* The model plan chooses as its default policy to state that the PHA does offer special purpose vouchers but leaves it to the PHA to enter information on which programs it administers. This will allow PHAs to select which special purpose vouchers to offer based on the requirements of their jurisdiction.
* You may delete the sections in the remainder of the chapter for the special purpose voucher types the PHA does not list under Option 1 and renumber the remaining sections accordingly.
* If a PHA decides not to offer any special purpose vouchers, select Option 2, and delete the remainder of the chapter.

**CAUTION:** **You must insert information here. The model plan does not contain language that can be adopted as-is.**

🞎 *Option 1*: *Use the model plan language shown below, listing the special purpose vouchers administered by the PHA.*

The PHA will administer the following types of special purpose vouchers: **[List special purpose vouchers administered by the PHA]**

🞎 *Option 2*: *Delete the model plan language. Complete and insert the language below.*

The PHA does not administer any special purpose vouchers.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**PART I: FAMILY UNIFICATION PROGRAM (FUP)**

**19-I.A. PROGRAM OVERVIEW [Fact Sheet, Housing Choice Voucher Program Family Unification Program (FUP); Notice PIH 2025-08]**

**Overview**

This section is an overview of the FUP program. **No policy decisions are required.**

**Assigning Vouchers [FUP FAQs]**

A PHA administering FUP may assign a specific number or percentage of FUP vouchers to FUP youth (FUPY) and a specific number or percentage to FUP families (FUPF).

**☑ Decision Point: Will the PHA assign specific numbers or percentages of FUP vouchers to FUP youths and FUP families?**

### Things to Consider

* If the PHA decides to implement a voucher assignment, it must be described in the administrative plan.
* HUD provides an example of such an assignment in the FUP FAQs and states that if a PHA is awarded 100 FUP vouchers, the PHA may assign 40 of their awarded FUP vouchers to youths and 60 to families.
* The PHA must consider local housing needs for both populations when making this determination and must maintain the documentation supporting the decision [FUP FAQs].
* The PHA may not limit FUP to either families or youths. By Statute, both populations are eligible for assistance under FUP. The PHA may not exclude a statutorily eligible population from participating [2019 FUP NOFA FAQs].
* In order to provide the PHA with maximum flexibility, the model plan chooses not to implement such a cap.
* One of the advantages of assigning a specific number or percentage of FUP vouchers for FUP-eligible youths and a specific number or percentage for FUP-eligible families is that the actual number of FUP vouchers used by FUP-eligible youths is less likely to decrease over time. This is because when a FUP voucher is given to a FUP-eligible youth, that voucher is available for turnover after 36 to 60 months’ worth of assistance, and if that voucher is re-allocated to a FUP-eligible family (whose assistance is not time-limited), the number of FUP vouchers in use by FUP-eligible youths could shrink over time, as the number of FUP vouchers in use by FUP-eligible families grows.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA has not designated any specific number or percentage of FUP vouchers for youths or families. The PHA will serve all referrals that meet program eligibility requirements, up to the PHA’s FUP voucher allocation.

🞎 *Option 2*: *Delete the model plan language and insert the language below, including the numbers of FUP vouchers to be assigned and the documentation to support the determination.*

The PHA will assign a specific percentage of FUP vouchers to youth and to families. The PHA will assign **[insert number]** of their awarded FUP vouchers to youths and **[insert number]** of their awarded FUP vouchers to families.

The PHA has taken into consideration local housing needs for both populations in making this determination. **[Insert documentation to support this determination]**

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-I.B. PUBLIC CHILD WELFARE AGENCY (PCWA) [Notice PIH 2025-08]**

In order to administer the program, the PHA must form a partnership with a local Public Child Welfare Agency (PCWA) who is responsible for determining the family or youth meets FUP eligibility requirements and referring them to the PHA. For FUP youth, the PCWA also provides supportive services once they are admitted to the program.

**☑ Decision Point: Which PCWAs will the PHA partner with to administer the program?**

### Things to Consider

* *PCWA* is defined as the public agency responsible under applicable [state](https://www.law.cornell.edu/definitions/uscode.php?width=840&height=800&iframe=true&def_id=42-USC-80204913-1141073627&term_occur=999&term_src=) law for determining that a child is at imminent risk of placement in out-of-home care or that a child in out-of-home care under the supervision of the public agency may be returned to their family, or that a youth is at least 18 years and not more than 24 years of age and 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 is at risk of becoming homeless at age 16 or older [2019 FUP NOFA].
* A PHA may enter into an MOU with more than one PCWA.
* A PHA that has been awarded FUP vouchers under multiple NOFAs may choose to adopt a single MOU to administer its FUP program.
* The PCWA must certify that the referred FUP applicant meets FUP eligibility requirements unless the PCWA has vested another organization with this authority. The MOU between the PHA and the PCWA should indicate what organizations have this authority and the model policy should be edited to reflect this language.
* FUP referrals can come from other organizations in the community who work with the population, including organizations that the PCWA has contracted with to handle a specific department or division, and through a Continuum of Care’s (CoC’s) coordinated entry system. In cases where a referral comes from another organization in the community, the PCWA must certify that the FUP applicant meets FUP eligibility requirements, unless the PCWA has vested another organization with this authority. The MOU between the PHA and the PCWA should indicate what organizations have this authority.
* The PHA may wish to insert any MOUs with partnering organizations as an exhibit to this chapter.

**CAUTION:** **You must insert information here. The model plan does not contain language that can be adopted as-is.**

🞎 *Option 1*: *Use the model plan language shown below, inserting the names of partnering organizations.*

The PHA has entered into an MOU with the following partnering organizations ***[insert names of public child welfare agency (PCWA), continuum of care, and any other partnering organizations].***

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Supportive Services**

The PCWA must provide supportive services for the period of time defined in the notice or NOFA/O for which the funding was made available to all FUP-eligible youth regardless of their age.

**☑ Decision Point: During what time period will supportive services be offered to FUP youth?**

### Things to Consider

* At a minimum, supportive services must be provided for 18 months.
* Although the Housing Opportunities through Modernization Act (HOTMA) extended a FUP youth’s maximum assistance period from 18 to 36 months, the requirement for the PCWA to provide supportive services for 18 months did not change.
* Under the 2019 NOFA, the PHA received additional points if the MOU between the PHA and PCWA indicated that supportive services would be provided for more than 18 months, with the most points for those that indicated services would be provided for a full 36-months. Therefore, Option 1 indicates that supportive services will be provided for 36 months. If the PHA’s MOU provides for a shorter period, not less than 18 months, the language in the model policy should be edited.
* Further, FR Notice 1/24/22 increased the time maximum time period for assistance from 36 months to up to 60 months in certain cases. The notice states that the PCWA “is responsible for providing or leveraging follow-up supportive services… for the period defined in the notice or Notice of Funding Availability/Opportunity (NOFA/O) for which the funding was made available.” Therefore, the PHA should consult the NOFA/O under which funding was made available prior to selecting Option 1.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PCWA will provide supportive services for all FUP youth for a period of 36 months.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**☑ Decision Point: Will additional supportive services be provided beyond what is required under FUP program guidelines?**

### Things to Consider

* At a minimum, the PCWA or a designated agency or organization under contract with the PCWA must provide the supportive services listed in the administrative plan.
* As identified in the MOU, additional supportive services may be offered.
* Examples of additional supportive services may include housing search assistance in low-poverty census tracts, including working with landlords to secure appropriate eligible units, mobility assistance through pre-move and post-move counseling, and cash assistance.
* Since language on additional supportive services will be specific to the PHA, Option 1 states additional supportive services will not be offered. If additional services will be offered, select Option 2 and list the services.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

Additional supportive services will not be offered.

🞎 *Option 2*: *Delete the model plan language. Complete and insert the language below.*

In accordance with the PHA’s MOU, the following additional supportive services will be provided: **[Insert additional supportive services offered]**

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-I.C. FUP FAMILY VOUCHERS ELIGIBILITY CRITERIA**

This section defines eligibility criteria the PCWA uses to verify families qualify under FUP. **No policy decisions are required.**

**19-I.D. FUP YOUTH VOUCHER ELIGIBILITY CRITERIA**

**Eligibility Criteria**

This section defines eligibility criteria the PCWA uses to verify youth qualify under FUP. **No policy decisions are required.**

**19-I.E. ASSISTANCE PERIOD [FR Notice 1/24/22]**

**Maximum Assistance Period**

Although there is no time limit on FUP family vouchers, FUP youth vouchers are limited by statute. Unless the FUP youth meets an exception outlined in this section of the model plan, after 36 months of assistance, the FUP youth voucher must be terminated. However, any period of time for which no subsidy (HAP) is being paid on behalf of the youth does not count toward the 36-month limitation.

If the FUP youth does meet the requirements outlined below, the statutory limit on FUP assistance is a total of 60 months of FUP voucher assistance [FR Notice 1/24/22]. **No policy decisions are required.**

**Extension of Assistance**

FUP youth who first leased or lease a unit after December 27, 2020, may be eligible for an extension of assistance up to 24 months beyond the 36-month time limit (for a total of 60 months of assistance). **No policy decisions are required.**

**Statutory Exceptions**

A FUP youth will be entitled to receive an extension of assistance for up to 24 months beyond the 36-month time limit without participating in the PHA’s FSS program if they certify that they meet certain exceptions.

***Exception 1: The FUP youth is a parent or other household member responsible for the care of a dependent child under the age of six or for the care of an incapacitated person.***

**☑ Decision Point: How will the PHA define *incapacitated person*?**

### Things to Consider

* HUD does not define the term *incapacitated person* but is providing PHAs with flexibility in applying this requirement.
* HUD states that PHAs may choose to apply the definition of *incapacitated person* that has been established under state or local law. Because of this, Option 1 requires the PHA to insert this definition.
* HUD encourages PHAs to apply this exception in a manner that provides extensions of assistance to the broadest population possible consistent with the statutory requirements. Option 1 uses this language in order to allow the PHA to consider a broad range of possibilities.
* The statute does not require that the child or incapacitated person reside in the household in order for the youth to certify that they meet this exception.
* For example, a youth may submit a certification on the basis that they are responsible for the care of a dependent child under the age of six even if the child resides in the household only part of the time due to a shared custody arrangement.
* Similarly, a youth may submit this certification on the basis that they are responsible for the care of an incapacitated person, such as an elderly relative, even if the incapacitated person does not reside in the household.

**CAUTION:** **You must insert information here. The model plan does not contain language that can be adopted as-is.**

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA defines *incapacitated person* as **[insert definition under state and local law]**.

The PHA will apply this exception in a manner that provides extensions of FUP youth assistance to the broadest population possible consistent with the statutory requirements.

The FUP youth will be required to self-certify that they meet this exception on a PHA-provided form. This certification is the only documentation that the FUP youth must submit.

The child or incapacitated person is not required to reside in the household in order for the youth to certify they meet this exception. For example, a child in a joint custody arrangement under the age of six who resides in the household only part-time may qualify the youth for this exception.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

***Exception 2: The FUP youth is a person who is regularly and actively participating in a drug addiction or alcohol treatment and rehabilitation program.***

**☑ Decision Point: How will the PHA define *regular and active participation* in a drug addiction or alcohol rehabilitation program?**

### Things to Consider

* HUD does not define the term *regular and active participation*.
* HUD encourages PHAs to apply this exception in a manner that provides extensions of assistance to the broadest population possible consistent with the statutory requirements. Option 1 uses this language in order to allow the PHA to consider a broad range of possibilities.
* Since the only allowable form of verification is a self-certification, the model policy language does not state that the PHA will verify attendance in such programs.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will define *regular and active participation* in a manner that provides extensions of FUP youth assistance to the broadest population possible consistent with the statutory requirements.

The FUP youth will be required to self-certify that they meet this exception on a PHA-provided form. This certification is the only documentation that the FUP youth must submit.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

***Exception 3: The FUP youth is a person who is incapable of complying with the requirement to participate in a FSS program as described above or engage in education, workforce development, or employment activities as described below, as applicable, due to a documented medical condition.***

**☑ Decision Point: How will the PHA define *medical conditions*?**

### Things to Consider

* HUD is not defining the types of medical conditions that may meet this requirement but is providing PHAs with flexibility in applying this requirement.
* HUD encourages PHAs to apply this exception in a manner that provides extensions of FUPY/FYI assistance to the broadest population possible consistent with the statutory requirements.
* Option 1 uses this language in order to allow the PHA to consider a broad range of possibilities.
* Since the only form of verification required is a self-certification, the model policy language does not state that the PHA will verify the existence of such conditions beyond a self-certification.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will apply this requirement in a manner that provides extensions of FUP youth assistance to the broadest population possible consistent with statutory requirements.

The FUP youth will be required to self-certify that they meet this exception on a PHA-provided form. This certification is the only documentation that the FUP youth must submit.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Education, Workforce Development, or Employment Activities**

A PHA’s policies implementing its education, workforce development, and employment requirements must be included in its administrative plan.

If a PHA that carries out an FSS program is unable to offer a FUP youth an FSS slot during their first 36 months of receiving FUP youth assistance, the youth is considered to have been “unable to enroll” in the program and may have their voucher extended by meeting the education, workforce development, or employment criteria described below:

***Criterion 1: The youth was engaged in obtaining a recognized postsecondary credential or a secondary school diploma or its recognized equivalent.***

**☑ Decision Point: How will the PHA define *recognized postsecondary credential* and *secondary school diploma or recognized equivalent?***

### Things to Consider

* While HUD does not define this term, FR Notice 1/24/22 states that PHA may use the definitions of *recognized postsecondary credential* and *secondary school diploma or its recognized equivalent* under the Workforce Innovation and Opportunity Act (WIOA). As such, Option 1 adopts this definition.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will use the definitions of *recognized postsecondary credential* and *secondary school diploma or its recognized equivalent* under the Workforce Innovation and Opportunity Act (WIOA). WIOA defines a *recognized postsecondary credential* as a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state involved or federal government, or an associate or baccalaureate degree (29 U.S.C. 3102). Examples of a recognized postsecondary credential include, but are not limited to, an associate’s degree, bachelor’s degree, occupational licensure, or occupational certification (see U.S. Department of Labor, Training and Employment Guidance Letter No. 10–16, Change 1). For the purpose of WIOA, the U.S. Department of Labor defines a *secondary school diploma or its recognized equivalent* as a secondary school diploma (or alternate diploma) that is recognized by a state and that is included for accountability purposes under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA). A secondary school equivalency certification signifies that a student has completed the requirement for a high school education. Examples of a secondary school diploma or its recognized equivalent include, but are not limited to, obtaining certification of attaining passing scores on a state-recognized high school equivalency test, earning a secondary school diploma or state-recognized equivalent, or obtaining certification of passing a state-recognized competency-based assessment.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

***Criterion 2: The youth was enrolled in an institution of higher education, as such term is defined in section 101(a) of the Higher Education Act of 1965 (20 U.S.C. 1001(a)) or an institution that meets the definition of a proprietary institution of higher education or a postsecondary vocational institution under sections 102(b)(1) and (c)(1) of the Higher Education Act of 1965 (20 U.S.C. 1002(b)(1) and (c)(1)), respectively.***

**☑ Decision Point: Will the PHA define a minimum number of classes or credits that a youth must be enrolled in in order to receive an extension of assistance?**

### Things to Consider

* The statute does not establish a minimum number of classes or credits that a youth must be enrolled in in order to receive an extension of FUPY/FYI assistance under this provision. Conversely, the PHA is not prohibited from establishing such minimum requirements. Therefore, a PHA may, but is not required, to establish a minimum number of classes or credits that a youth must be enrolled in in order to receive an extension of assistance under this provision.
* However, HUD strongly encourages PHAs to establish policies that provide extensions of FUPY/FYI assistance for youth that were engaged in such activities on a part-time basis as long as they meet the requirement to engage in such activities for not less than nine months of the 12-month period preceding each extension.
* If a PHA chooses to establish minimum requirements, HUD encourages the PHA to establish policies that would allow them to make exceptions to such requirements for circumstances beyond the youth’s control. Option 1 makes such an exception.
* For example, a PHA may establish a requirement that a youth must be enrolled in education activities on at least a half-time basis but may make exceptions to this requirement if the youth is unable to enroll in a sufficient number of classes due to a lack of course offerings by the educational institution where the youth is enrolled.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

Youth must be enrolled in education activities on at least a half-time basis, as defined by the institution that they attend. However, the PHA may make exceptions to this requirement if the youth is unable to enroll in a sufficient number of classes due to a lack of course offerings by the educational institution where the youth is enrolled.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

***Criterion 3: The youth was participating in a career pathway, as such term is defined in Section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102).***

No policy decisions are required.

***Criterion 4: The youth was employed.***

**☑ Decision Point: Will the PHA define a minimum number of classes or credits that a youth must be enrolled in in order to receive an extension of assistance?**

### Things to Consider

* The statute does not establish a minimum number of hours a youth must work in order to receive an extension of FUPY/FYI assistance under this provision. Conversely, the PHA is not prohibited from establishing such minimum requirements. Therefore, a PHA may, but is not required, to establish a minimum number of hours that a youth must work in order to receive an extension of assistance under this provision.
* However, HUD strongly encourages PHAs to establish policies that provide extensions of FUPY/FYI assistance for youth that were engaged in such activities on a part-time basis as long as they meet the requirement to engage in such activities for not less than nine months of the 12-month period preceding each extension. Because of this, the model policy defines *employment* as 20 hours a week, as this is usually considered part-time.
* If the PHA chooses not to define a number of hours for work activities, the PHA should select Option 2.
* If a PHA chooses to establish minimum requirements, HUD encourages the PHA to establish policies that would allow them to make exceptions to such requirements for circumstances beyond the youth’s control.
* For example, a PHA may establish a requirement that a youth must work a minimum number of hours per week but may make exceptions to this requirement if the youth’s hours are reduced due to circumstances beyond their control or the youth must temporarily reduce their work hours due to a family emergency. Option 1 makes such an exception.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will consider the youth to be employed if they work a minimum of 20 hours per week. The PHA may make exceptions to this requirement if the youth’s hours are reduced due to circumstances beyond their control or the youth must temporarily reduce their work hours due to a verified family emergency.

🞎 *Option 2*: *Edit the model plan language or delete it and insert the PHA’s policy.*

The PHA will not define a number of hours that the youth must be employed.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**FSS Enrollment at 24 Months**

If the FUP youth has not been provided an opportunity to enroll in the FSS program during the first 24 months of FUP assistance, HUD encourages the PHA to remind the youth at the 24-month reexamination of the education, workforce development, and employment requirements described above so that the youth has enough time to meet these requirements prior to the expiration of the 36-month time period for FUP assistance.

**☑ Decision Point: Will the PHA remind the youth of education workforce development, and employment requirements at the 24-month reexam?**

### Things to Consider

* Since HUD encourages PHAs to remind youth at their 24-month reexamination of the education, workforce development, and employment requirements, the model policy adopts this suggestion.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

If the FUP youth has not been provided an opportunity to enroll in the FSS program during the first 24 months of FUP assistance, the PHA will remind the youth at their second regular reexamination of the education, workforce development, and employment requirements described above.

🞎 *Option 2:* *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**FSS Enrollment Between 36 and 48 Months**

This section discusses FSS enrollment between 36 and 48 months. **No policy decisions are required.**

**FSS Enrollment After 48 Months**

The PHA may, but is not required to, offer a FUP youth an FSS slot that becomes available between the 48-month mark and the 60-month mark.

**☑ Decision Point: Will the PHA offer an FSS slot that becomes available between the 48-month and 60-month mark?**

### Things to Consider

* Since the youth will have already received their second and final extension, Option 1 states that the PHA will not offer the FSS slot to the youth.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

If an FSS slot becomes available between the 48 and 60-month marks, the PHA will not offer the FSS slot to a FUP youth.

🞎 *Option 2:* *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Extensions of Assistance**

This section discusses requirements for extension of assistance. **No policy decisions are required.**

**No FSS Program or Unable to Enroll in FSS**

This section discusses situations that arise when the PHA does not have an FSS program or is unable to enroll the youth in the FSS program. **No policy decisions are required.**

**Verification Prior to Annual Reexam**

In order to provide an extension of assistance, the PHA must verify compliance with the above requirements at the end of the 36-month time period and the 48-month time periods. The PHA does not need to verify compliance with these requirements at the end of the 60-month time period since the maximum length of assistance is 60 months.

**☑ Decision Point: How will the PHA verify compliance?**

### Things to Consider

* To verify compliance with the FSS requirement, the PHA must examine its records to confirm, or obtain confirmation from the PHA’s FSS program staff, that the FUPY/FYI participant is in compliance with FSS program requirements and has not been terminated from the FSS program.
* The PHA must provide the FUPY/FYI youth written notification informing them that they may receive an extension of their FUPY/FYI assistance if they meet one of the statutory conditions and providing instructions on how the youth may demonstrate that they meet one of these conditions. This notification must be provided sufficiently in advance of the end of the 36-month time period or 48-month time period, as applicable, to allow the FUPY/FYI youth to demonstrate that they meet one of these statutory conditions and for the PHA to conduct an annual reexamination prior to the expiration of the FUPY/FYI assistance. Therefore, Option 1 states that written notice will be sent 60 days prior to the scheduled reexamination date.
* In order for the FUPY/FYI youth to meet the education, workforce development, or employment requirement, the youth must demonstrate to the PHA that they were engaged in at least one education, workforce development, or employment activity for at least nine months of the 12-month period immediately preceding the end of the 36-month or 48-month time period, as applicable. Due to the timing of when the PHA verifies compliance and conducts the annual reexamination, the FUPY/FYI youth may have not yet met the nine-month requirement but may be able to demonstrate that they will meet the nine-month requirement as of the end of the 36-month or 48-month time period. In such cases, the FUPY/FYI youth will still be considered to have met the requirements. The model policy adopts this language.
* In order for the FUPY/FYI youth to meet one of the statutory exceptions, the youth must submit a certification to the PHA that they meet one of these exceptions. This certification is the only documentation that the FUPY/FYI youth must submit in order to demonstrate that they meet one of these exceptions. The model policy states this in Option 1 to make clear that no additional documentation will be required.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will verify compliance with the education, workforce development, or employment requirement, or one of the statutory exceptions, at the end of the 36-month and 48-month time periods prior to the FUP youth’s scheduled annual reexamination. The PHA will not verify compliance at the end of the 60-month time period.

The PHA will provide each FUP youth on the PHA’s program with a written notification informing them that they may receive an extension of their FUP assistance if they meet conditions outlined in this chapter and providing them with instructions on how they may demonstrate compliance at least 60 days prior to their scheduled annual reexamination date. When necessary, the PHA will provide this notification in a format accessible to FUP youth with disabilities and in a translated format for FUP youth with limited English proficiency in accordance with Chapter 2.

The PHA will use the following verification methods to verify a FUP youth’s eligibility for voucher extensions:

To verify compliance with the FSS requirement, the PHA will examine its records to confirm, or obtain confirmation from the PHA’s FSS program staff, that the FUP youth participant is in compliance with FSS program requirements and has not been terminated from the FSS program.

To meet the education, workforce development, or employment requirement, the PHA will verify that the FUP youth was engaged in at least one education, workforce development, or employment activity for at least nine months of the 12-month period immediately preceding the end of the 36-month or 48-month time period, as applicable.

Due to the timing of when the PHA verifies compliance and conducts the annual reexamination, the FUP youth may have not yet met the nine-month requirement but may be able to demonstrate that they will meet the nine-month requirement as of the end of the 36-month or 48-month time period. In such cases, the FUP/FYI youth will still be considered to have met the requirements.

In order for the FUP youth to meet one of the statutory exceptions described above, the youth must submit a certification to the PHA that they meet one of these exceptions. This certification is the only documentation that the FUP youth must submit in order to demonstrate that they meet one of these exceptions.

🞎 *Option 2:* *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Termination of Assistance for Failure to Meet Conditions**

This section discusses termination of assistance. **No policy decisions are required.**

**19-I.F. REFERRALS AND WAITING LIST MANAGEMENT**

**Referrals**

**☑ Decision Point: How will referrals between the PCWA and PHA be processed?**

### Things to Consider

* Studies show that serving youth with FUP requires considerable cross-agency communication and collaboration.
* The MOU must identify staff positions at both the PHA and the PCWA who will serve as the lead FUP liaisons. These positions will be responsible for the transmission and acceptance of FUP referrals.
* The PCWA must have a system for identifying FUP-eligible youth within the agency’s caseload.
* In order to expediate the referral process, the model policy states that communication between the PCWA and PHA will occur via email.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

As part of the MOU, the PHA and PCWA have identified staff positions to serve as lead FUP liaisons. These positions will be responsible for transmission and acceptance of FUP referrals. The PCWA must commit sufficient staff and resources to ensure eligible families and youths are identified and determined eligible in a timely manner.

When FUP vouchers are available, the PHA liaison responsible for acceptance of referrals will contact the PCWA FUP liaison via email indicating the number of vouchers available and requesting an appropriate number of referrals. No more than 10 business days from the date the PCWA receives this notification, the PCWA liaison will provide the PHA with a list of eligible referrals include the name, address, and contact phone number for each adult individual who is being referred; a completed release form for each adult family member; and a written certification for each referral indicating the youth or family is FUP-eligible.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**☑ Decision Point: What documentation, if any, that demonstrates the family or youth’s eligibility for FUP will the PHA retain?**

### Things to Consider

* While the PHA is not required to maintain full documentation that demonstrates the family or youth’s eligibility as determined by the PCWA, HUD says the PHA should keep the referral or certification from the PCWA.
* For ease of administration, the model policy states that the PHA will keep the PCWA’s referral in the participant’s file along with other eligibility paperwork.
* If the PHA wishes to require additional documentation, the model policy should be amended.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will maintain a copy of the referral or certification from the PCWA in the participant’s file along with other eligibility paperwork.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Waiting List Placement**

The PHA may either use a single waiting list for its Section 8 tenant-based assistance program or may maintain a separate waiting list for FUP and FYI vouchers.

**☑ Decision Point: Will the PHA use a separate waiting list for FUP and FYI?**

### Things to Consider

* If the PHA does not maintain a separate waiting list for FUP and FYI vouchers:
  + Once referrals are made, the PHA must compare the list of PCWA referrals to its HCV waiting list to determine if any applicants on the PCWA’s referral list are already on the PHA’s HCV waiting list.
  + Applicants already on the PHA’s HCV waiting list retain the order of their position on the list. Applicants not already on the PHA’s HCV waiting list must be placed on the HCV waiting list.
  + For families already on the waiting list, the PHA must indicate that they are already FUP eligible.
  + For referrals not already on the list, the PHA will need information in the form of a pre-application or an application. FUP guidance does not indicate how this should occur, so the model policy states that the PHA will work with the PCWA to complete the application. Since this process may take some time, the model policy also states that once this process is completed, the referral will be placed on the application using the date and time of the original referral.
  + The PHA may, but is not required to, adopt a preference for FUP in accordance with 24 CFR 982.207. A preference is not required because FUP funding must be used, as required by appropriations law, for families and youths that meet the standard for FUP assistance. Therefore, the model policy does not adopt such a preference. If the PHA wishes to adopt such a preference, you should select Option 2 and edit the model policy in Section 4-III.C. to implement such a preference.
  + If the PHA has waiting list preferences, they apply in the selection of FUP applicants for a FUP voucher only in relation to other FUP applicants on the HCV waiting list. For example, if the PHA has a residency preference and FUP applicant A qualifies for that preference, but FUP applicant B does not, then FUP applicant A must be selected first from the HCV waiting list when a FUP voucher becomes available. On the other hand, the PHA must select a FUP applicant for a FUP voucher (when available) even if the next person on the HCV waiting list is a regular HCV applicant that qualifies for a preference that the FUP applicant does not.
  + If a PHA selects applicants from the HCV waiting list based on a random drawing, a FUP applicant would be selected before another FUP applicant that applied earlier.
  + If the PHA’s HCV waiting list is closed, the PHA must open its HCV waiting list in order to accept new FUP applicants. If necessary, the PHA may open its waiting list solely for FUP applicants, but this information must be included in the PHA’s notice of opening its waiting list (see section 4-II.C., Opening and Closing the Waiting List of this administrative plan).
* If a PHA chooses to establish a separate FUP and FYI waiting list:
  + It must also place all FUP and FYI applicants on its regular HCV waiting list on the separate FUP and FYI waiting list in accordance with their respective position on the regular HCV waiting list.
  + A PHA should be able to identify all of the FUP and FYI applicants on its regular HCV waiting list, since the PHA must receive a referral and/or certification of eligible FUP or FYI status from the PCWA for each applicant. However, the PHA is encouraged to reach out to its partnering PCWA to verify that its list of FUP and FYI applicants is complete and accurate in accordance with their records. FUP and FYI applicants will not lose their position on the general HCV waiting list even though they will now also be placed on the separate FUP/FYI waiting list.
  + PHAs must establish their own policies regarding whether to remove the applicant from the general HCV waiting list upon being issued a FUP/FYI voucher.
  + PHAs should inform a youth, before choosing to receive a FUP or FYI voucher, of the time-limited nature of the voucher assistance and whether the youth will be able to remain on the general HCV waiting list.
  + If a PHA chooses to create a separate FUP and FYI waiting list, the PHA must ensure that all families on its HCV waiting list are informed of the separate FUP and FYI waiting list and also have an opportunity to be placed on the list should the partnering PCWA certify to their eligibility for these special purpose vouchers.
  + PHAs must also inform individuals on the HCV waiting list of the separate FUP and FYI waiting list by either posting the information to their website or providing public notice in their communities.
  + PHAs must ensure effective communication of notice is provided by taking a combination of actions, which may include:
    - Ensuring outreach to organizations serving youth, families, and other service organizations, so there is widespread awareness of the availability of a separate waiting list and how to access this resource;
    - Providing information on social media sites; and
    - Other communication methods.
  + While the PHA will already know about FUP or FYI-eligible families because of the required certification/referral process, this notice will ensure that if there are any other applicants on the general HCV waiting list that would also qualify, that they are made aware of and have an opportunity to be placed onto the separate waiting list.
  + When providing notice, the PHA must describe the eligibility criteria for FUP and FYI vouchers and describe the actions an individual should take to be added to the FUP and FYI waiting list. The PHA notice should also make clear to applicants that if they decide to be included on the FUP and FYI waiting list, they will not lose their position on the HCV waiting list. PHAs must allow sufficient time for the communication of notice described above before issuing vouchers from the separate FUP and FYI waiting list. In the interim, PHAs may continue to use their HCV waitlist for issuing FUP and FYI vouchers.
  + If a PHA chooses to create a separate FUP and FYI waiting list, PHAs may use date and time of application in selecting an applicant from the FUP and FYI waiting list among applicants with the same preference status in accordance with the PHA’s administrative plan. Alternatively, a drawing or other random choice technique may be used, when determination of the date and time cannot be established between applicants with the same preferences, that both qualify to be selected next from the waiting list. For PHAs that rely on the date and time of application in determining the order in which an applicant is selected from the FUP and FYI waiting list, HUD is waiving 982.207(c)(1) and establishing as an alternative requirement that the application date and time of the applicant’s prior HCV application must be used for those FUP and FYI applicants that are already on the HCV waiting list. For example, if the PHA uses the date of application to determine the order of selection for applicants who qualify for the same FUP and FYI waiting list local preference, the date used to determine an applicant’s place on the waiting list compared to other applicants who qualify for that preference is the date of their application for the HCV program. However, the order in which an applicant may be reached on the FUP and FYI waiting list compared to the regular HCV waiting list may be different depending on the local preferences the PHA establishes for the FUP and FYI waiting list.
  + Selection from the separate FUP and FYI waiting list must be in accordance with local nondiscriminatory preferences that the PHA establishes for FUP and FYI applicants. This may result in the selection of an applicant from the FUP and FYI waiting list who was not previously on the HCV waiting list ahead of those who were on the HCV waiting list based on the applicant’s eligibility for a FUP and FYI waiting list preference.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will not maintain a separate waiting list for FUP and FYI vouchers.

Within 10 business days of receiving the referral from the PCWA, the PHA will review the HCV waiting list and will send the PCWA a list confirming whether or not referrals are on the waiting list.

Referrals who are already on the list will retain their position and the list will be notated to indicate the family or youth is FUP-eligible.

For those referrals not already on the waiting list, the PHA will work with the PCWA to ensure they receive and successfully complete a pre-application or application, as applicable. Once the pre-application or application has been completed, the PHA will place the referral on the HCV waiting list with the date and time of the original referral and an indication that the referral is FUP-eligible.

If the PHA’s HCV waiting list is closed, the PHA will open its HCV waiting list in order to accept new FUP applicants. If necessary, the PHA may open its waiting list solely for FUP applicants, but this information must be included in the PHA’s notice of opening its waiting list (see section 4-II.C., Opening and Closing the Waiting List of this administrative plan).

🞎 *Option 2*: *Delete the model plan language. Complete and insert the language below.*

The PHA will place all FUP and FYI on both the HCV waiting list and a separate FUP and FYI waiting list in accordance with their respective position on the regular HCV waiting list. FUP and FYI applicants will not lose their position on the general HCV waiting list even though they are also placed on the separate FUP and FYI waiting list. The PHA will not remove the applicant from the general HCV waiting list upon being issued a FUP/FYI voucher.

The PHA will ensure that all families on its HCV waiting list are informed of the separate FUP and FYI waiting list by posting the information on the PHA’s website. Families will have an opportunity to be placed on the list should the partnering PCWA certify to their eligibility for these special purpose vouchers. In addition, the PHA will conduct outreach to organizations serving youth, families, and other service organizations so there is widespread awareness of the availability of a separate waiting list and how to access this resource and provide information on the PHA’s social media sites. When providing notice, the PHA will describe the eligibility criteria for FUP and FYI vouchers and describe the actions an individual should take to be added to the FUP and FYI waiting list. The PHA notice will also make clear to applicants that if they decide to be included on the FUP and FYI waiting list, they will not lose their position on the HCV waiting list.

The PHA will use date and time of application in selecting an applicant from the FUP and FYI waiting list. The application date and time of the applicant’s prior HCV application will be used for those FUP and FYI applicants that are already on the HCV waiting list.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Waiting List Selection** **[Notice PIH 2025-08]**

This section describes how FUP-eligible families are selected from the PHA’s waiting list. In addition, the PHA may establish separate preferences for FUP and FYI applicants.

**☑ Decision Point: Will the PHA establish separate preferences for FUP and FYI applicants?**

### Things to Consider

* While PHAs may establish local preferences based on local housing needs and priorities (24 CFR 982.207(a)), HCV regulations do not permit PHAs to establish separate preferences for FUP and FYI applicants. Preferences apply to all applicants on the waiting list. HUD is waiving 24 CFR 982.207(a)(1) and establishing an optional waiver permitting PHAs to establish separate preferences for FUP and FYI applicants.
* PHAs must ensure that their system of local preferences and processes for accepting referrals from partners does not violate nondiscrimination requirements under any applicable federal civil rights law, including but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Age Discrimination Act.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will not apply separate preferences to FUP and FYI applicants.

🞎 *Option 2*: *Delete the model plan language. Complete and insert the language below.*

The PHA will apply the following local preferences to FUP and FYI applicants: **[Insert a description of preferences]**

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-I.G. PHA HCV ELIGIBILITY DETERMINATION**

**☑ Decision Point: Will the PCWA provide criminal information to the PHA during the referral process, and will the PHA consider this information in making its eligibility determination?**

### Things to Consider

* HUD regulations do not impose an obligation on PCWAs to provide information regarding an applicant’s criminal history to the PHA.
* However, HUD has stated that it is in the best interest of the PHA and the PCWA for this information to be made known to the PHA during the referral process, subject to any privacy laws, since an applicant’s criminal history could make the applicant ineligible for assistance under PHA policy.
* PCWAs may also possess information as to whether the applicant is participating in or has successfully completed a supervised drug or alcohol rehabilitation program. Such details may be helpful to the PHA in determining an applicant’s eligibility and may result in the applicant being determined eligible under PHA policy [FUP FAQs].

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

Subject to privacy laws, the PCWA will provide any available information regarding the applicant’s criminal history to the PHA.

The PHA will consider the information in making its eligibility determination in accordance with the PHA’s policies in Chapter 3, Part III.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Additional FUP Eligibility Factors [FUP FAQs]**

This section describes additional FUP eligibility factors.

**☑ Decision Point: How will ineligible applicants be notified?**

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

Any applicant that does not meet the eligibility criteria for the HCV program listed in Chapter 3 or any eligibility criteria listed in this section will be notified by the PHA in writing following policies in 3-III.F., including stating the reasons the applicant was found ineligible and providing an opportunity for an informal review.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-I.H. LEASE UP [FR Notice 1/24/22]**

Once the PHA determines that the family or youth meets HCV eligibility requirements, the family or youth will be issued a FUP voucher in accordance with PHA policies.

**Briefings [FR Notice 1/24/22]**

FR Notice 1/14/22 outlines required topics to be discussed during the briefing.

**☑ Decision Point: Will the PHA implement any additional policies for FUP youth or families with regard to lease up?**

### Things to Consider

* Option 1 states that FUP youth will be briefed individually rather than in a group briefing in order to allow the PHA time to discuss the time limitation on FUP youth vouchers and the supportive services offered by the PCWA and ensure that the FUP youth fully understands these special program components. If the PHA does not wish to brief FUP youth separately, the PHA should amend the policy in Option 1.
* The model policy states that FUP families will be briefed in a normal HCV briefing since FUP family vouchers do not require any special program considerations.
* Further, while HUD does not require that additional search time be given to FUP families or youth, in order to ensure that FUP voucher holders lease up successfully, Option 1 states that FUP voucher holders will be given one additional extension. This language will need to be edited if the PHA has amended the policy in Section 5-II.E. of the administrative plan or if the PHA does not wish to give any additional automatic extensions to FUP voucher holders.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

Eligible applicants will be notified by the PHA in writing following policies in Section 3-III.F. of this administrative plan. FUP families will attend a standard HCV briefing in accordance with PHA policies in Part I of Chapter 5 of this administrative plan. FUP youth will be briefed individually. The PHA will provide all aspects of the written and oral briefing as outlined in Part I of Chapter 5 but will also provide an explanation of the required items listed above.

For both FUP youth and FUP families, vouchers will be issued in accordance with PHA policies in Chapter 5 Part II, except that the PHA will consider one additional 30-day extension beyond the first automatic extension for any reason, not just those listed in the policy in Section 5-II.E.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Voucher Issuance [Notice PIH 2025-08]**

**☑ Decision Point: What are the PHA’s policies on the initial and extension terms of the voucher?**

### Things to Consider

* The initial search term for FUP vouchers must be at least 120 days from the date the voucher is issued. The initial 120-day term also applies when a family or youth chooses to move to a new unit with continued assistance inside or outside the PHA’s jurisdiction.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

All FUP vouchers will have an initial term of 120 calendar days. The PHA will notify the applicant in writing via email and/or through a phone call at least 30 days prior to the expiration of the initial term of the voucher and inquire if the applicant is in need of assistance with their housing search. The PHA will also remind the applicant of the housing search assistance that is available to them as set forth in the PHA’s partnership agreements.

Upon written or oral request of the applicant (either through an email, phone call, or through a written form), the PHA will automatically approve one 90-day extension to the initial voucher term as long as the request is made prior to the expiration date of the initial voucher term. Subsequent requests for extensions will follow PHA policies on voucher extensions found in Chapter 5. This includes granting additional extensions as needed as a reasonable accommodation.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-I.I. TERMINATION OF ASSISTANCE**

**General Requirements**

Termination of a FUP voucher must be consistent with regulations for termination in 24 CFR Part 982, Subpart L and be in compliance with PHA policies in Chapter 12. **No policy decisions are required.**

**FUP Family Vouchers**

The PHA may transfer the assistance of a FUP family voucher holder to regular HCV assistance if there are no longer children in the household.

**☑ Decision Point: Will the PHA transfer assistance of a FUP family voucher holder to a regular HCV in cases where children are no longer in the household?**

### Things to Consider

* A transfer of assistance would free a FUP voucher for another FUP eligible applicant. As a result, Option 1 states the PHA will transfer assistance, with the caveat that if the PHA has a PBV program, the PHA will issue Choice Mobility vouchers ahead of vouchers to families receiving a transfer of assistance since the PHA must serve these PBV families first. If the PHA does not operate a PBV program but will still transfer assistance, select Option 2.
* If the PHA does not wish to transfer assistance, the family remains eligible to retain their FUP assistance, and the PHA should selected Option 3.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will transfer the assistance of a FUP family voucher holder to regular HCV assistance if there are no longer children in the household and there is no prospect of any minor child being returned to the household.

If the PHA has no regular HCV vouchers available at the time this determination is made, including if no vouchers are available due to lack of funding, the PHA will issue the family the next available regular HCV voucher after those being issued to families residing in PBV units claiming Choice Mobility.

🞎 *Option 2*: *Delete the model plan language and insert the language below.*

The PHA will transfer the assistance of a FUP family voucher holder to regular HCV assistance if there are no longer children in the household and there is no prospect of any minor child being returned to the household.

If the PHA has no regular HCV vouchers available at the time this determination is made, including if no vouchers are available due to lack of funding, the PHA will issue the family the next available regular HCV voucher.

🞎 *Option 3*: *Delete the model plan language and insert the language below.*

The PHA will not transfer assistance if there are no longer children in the household for a FUP family voucher holder. The family will remain eligible to keep their FUP assistance.

🞎 *Option 4*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**FUP Youth Vouchers**

The PHA may not transfer the assistance of a FUP youth voucher holder to regular HCV assistance upon the expiration of the time limit on assistance. However, the PHA may issue a regular HCV to FUP youth if they were selected from the waiting list in accordance with PHA policies and may also adopt a preference for FUP youth voucher holders who are being terminated for this reason.

**☑ Decision Point: Will the PHA offer a waiting list preference for FUP youth upon the expiration of the 36-month time limit on assistance?**

### Things to Consider

* The PHA may choose to create a preference in their regular HCV program for persons whose FUP youth assistance is expiring and will have a lack of adequate housing as a result of their termination from the program, or other similar category.
* If the PHA adopts a selection preference for FUP youth who are terminated due to the time limit on assistance, the PHA should select Option 2. The PHA must also edit the model policy in Section 4-III.C. to reflect this policy.

PHA Policy

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will not provide a selection preference on the PHA’s HCV waiting list for FUP youth who are terminated due to the time limit on assistance.

🞎 *Option 2*: *Delete the model plan language and insert the language below.*

The PHA will provide a selection preference for youth who are terminated due to the time limit on assistance in accordance with PHA policy in Section 4-III.C. of the administrative plan.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-I.J. FUP PORTABILITY**

Portability for FUP vouchers is handled the same was as for a regular HCV family. **No policy decisions are required.**

**Considerations for FUP Youth Vouchers**

This section describes considerations for portability of FUP youth vouchers. **No policy decisions are required.**

**19-I.K. PROJECT-BASING FUP VOUCHERS [Notice PIH 2017-21; FR Notice 5/7/24; 24 CFR 983.6(d)(2); 983.54(c); 983.262(c) and (e); and FR Notice 1/24/22]**

The PHA may project-base FUP vouchers in accordance with PBV program requirements. The PHA may limit PBVs to one category of FUP-eligible participants (families or youth) or a combination of the two. See Chapter 17 for PHA policies on project-basing FUP vouchers.

**PART II: FOSTER YOUTH TO INDEPENDENCE INITIATIVE**

**19-II.A. PROGRAM OVERVIEW [Notice PIH 2020-28; Notice PIH** **2023-04; FR Notice 1/24/22; Notice PIH 2025-08]**

This section provides an overview of the FYI program. **No policy decisions are required.**

**19-II.B. PARTNERING AGENCIES [Notice PIH 2023-04; FYI Updates and Partnering Opportunities Webinar]**

**Public Child Welfare Agency (PCWA)**

In order to administer the program, the PHA must form a partnership with a local Public Child Welfare Agency (PCWA) who is responsible for identifying and referring eligible youth to the PHA and providing or securing a commitment for the provision of supportive services once youth are admitted to the program.

**☑ Decision Point: Which PCWA(s) will the PHA partner with to administer the program?**

### Things to Consider

* *PCWA* is defined as the public agency responsible under applicable [state](https://www.law.cornell.edu/definitions/uscode.php?width=840&height=800&iframe=true&def_id=42-USC-80204913-1141073627&term_occur=999&term_src=) law for determining that a child is at imminent risk of placement in out-of-home care or that a child in out-of-home care under the supervision of the public agency may be returned to their family, or that a youth is at least 18 years and not more than 24 years of age and 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 is at risk of becoming homeless at age 16 or older [2019 FUP NOFA].
* A PHA may enter into an MOU 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 TPVs.
* The partnering PCWA must meet the following requirements:
  + Have a system for identifying eligible youth within the agency’s caseload and review referrals from any third parties
  + Have a system of prioritization for eligible youth
    - The intent of prioritization should be to ensure that youth are prioritized for housing resources and related services based on the level of need and appropriateness of intervention. For youth still involved in the child welfare system, the permanency of goals should be taken into account
  + Provide written certification that the youth is eligible
  + Provide or secure a commitment for the provision of required supportive services in accordance with Notice PIH 2023-04
* At a minimum, the partnership agreement between the PHA and PCWA must:
  + Define eligible youth
  + List supportive services, including all supportive services list in Section 6 of Notice PIH 2023-04
  + State that the PCWA will provide the listed supportive services for 36 months
  + Address PHA responsibilities
  + Address PCWA responsibilities
  + Address third-party responsibilities
* The PHA may wish to insert any MOUs with partnering organizations as an exhibit to this chapter.

**CAUTION:** **You must insert information here. The model plan does not contain language that can be adopted as-is.**

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will implement a Foster Youth to Independence (FYI) program in partnership with ***[insert name(s) of PCWA(s)].***

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Continuum of Care (CoC) and Other Partners**

HUD strongly encourages PHAs to add other partners into the partnership agreement with the PCWA such as state, local, philanthropic, faith-based organizations, and the CoC, or a CoC recipient it designates.

**☑ Decision Point: Will the PHA partner with any other agencies besides the PCWA?**

### Things to Consider

* *Continuum of Care (CoC)* is defined as the group organized to carry out the responsibilities required under 24 CFR part 578 and is composed of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.
* Where other partners, such as state, local, philanthropic, faith-based organizations, and the CoC, or a CoC recipient it designates, will be party to the partnership agreement, the responsibilities of the entity must be identified:
  + Integrate the prioritization and referral process for eligible youth into the third party or CoC’s coordinated entry process.
  + Identify services, if any, to be provided using third party or CoC program funds to youth who qualify for third party or CoC program assistance.
  + Make referrals of eligible youth to the PCWA.

**CAUTION:** **You must insert information here. The model plan does not contain language that can be adopted as-is.**

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

In addition to the PCWA, the PHA will implement the FYI program in partnership with ***[insert names of any other partners the PHA designates in the partnership agreement].***

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-II.C. YOUTH ELIGIBILITY CRITERIA [Notice PIH 2023-04; FYI Q&As; FYI FAQs]**

This section defines eligibility criteria the PCWA uses to verify that youth qualify. **No policy decisions are required.**

**19-II.D. SUPPORTIVE SERVICES [Notice PIH 2023-04; FYI Updates and Partnering Opportunities Webinar; FYI Q&As]**

The PCWA must provide or secure a commitment of supportive services for participating youth for a period of 36 months.

**☑ Decision Point: Will additional supportive services be provided beyond what is required under FYI program guidelines?**

### Things to Consider

* At a minimum, the PCWA or a designated agency or organization under contract with the PCWA must provide the supportive services listed in the administrative plan.
* As identified in the MOU, additional supportive services may be offered.
* Examples of additional supportive services may include housing search assistance in low-poverty census tracts, including working with landlords to secure appropriate eligible units, mobility assistance through pre-move and post-move counseling, and cash assistance.
* Since language on additional supportive services will be specific to the PHA, Option 1 states additional supportive services will not be offered. If additional services will be offered, select Option 2 and list the services.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

Additional supportive services will not be offered.

🞎 *Option 2*: *Delete the model plan language. Complete and insert the language below.*

In accordance with the PHA’s MOU, the following additional supportive services will be provided: **[Insert additional supportive services offered]**

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-II.E. REFERRALS AND WAITING LIST MANAGEMENT [Notice PIH 2023-04; FYI Updates and Partnering Opportunities Webinar FYI FAQs]**

**Referrals**

**☑ Decision Point: How will referral between the PCWA and PHA be processed?**

### Things to Consider

* The MOU must identify staff positions at both the PHA and the PCWA, who will serve as FYI liaisons. These positions will be responsible for the transmission and acceptance of referrals.
* The PCWA must have a system for identifying and prioritizing eligible youth within the agency’s caseload.
* In order to expediate the referral process, the model policy states that communication between the PCWA and PHA will occur via email.
* Referrals may come from other organizations in the community who work with the population. In cases where a referral comes from another organization in the community, the PCWA must certify that the youth meets eligibility requirements, unless the PCWA has vested another organization with this authority.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA and PCWA have identified staff positions to serve as lead FYI liaisons. These positions will be responsible for transmission and acceptance of referrals. The PCWA must commit sufficient staff and resources to ensure eligible youths are identified, prioritized, and determined eligible in a timely manner.

When vouchers are available, the PHA liaison responsible for acceptance of referrals will contact the PCWA liaison via email indicating the number of vouchers available and requesting an appropriate number of referrals. No more than 10 business days from the date the PCWA receives this notification, the PCWA liaison must provide the PHA with a list of eligible referrals, a completed release form, and a written certification for each referral indicating the referral is eligible. The list will include the name, address, and contact phone number for each adult individual who is being referred.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**☑ Decision Point: What documentation, if any, that demonstrates the youth’s eligibility will the PHA retain?**

### Things to Consider

* While the PHA is not required to maintain full documentation that demonstrates the youth’s eligibility as determined by the PCWA, HUD says the PHA should keep the referral or certification from the PCWA.
* For ease of administration, the model policy states that the PHA will keep the PCWA’s referral in the participant’s file along with other eligibility paperwork.
* If the PHA wishes to require additional documentation, the model policy should be amended.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will maintain a copy of the referral or certification from the PCWA in the participant’s file along with other eligibility paperwork.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Waiting List Placement [Notice PIH 2023-04 and FYI FAQs]**

The PHA may either use a single waiting list for its Section 8 tenant-based assistance program or may maintain a separate waiting list for FUP and FYI voucher.

**☑ Decision Point: Will the PHA use a separate waiting list for FUP and FYI?**

### Things to Consider

* If the PHA does not maintain a separate waiting list for FUP and FYI vouchers:
  + Once referrals are made, the PHA must compare the list of PCWA referrals to its HCV waiting list to determine if any applicants on the PCWA’s referral list are already on the PHA’s HCV waiting list.
  + Applicants already on the PHA’s HCV waiting list retain the order of their position on the list. Applicants not already on the PHA’s HCV waiting list must be placed on the HCV waiting list.
  + For families already on the waiting list, the PHA must indicate that they are already FYI-eligible.
  + For referrals not already on the list, the PHA will need information in the form of a pre-application or an application. FYI guidance does not indicate how this should occur, so the model policy states that the PHA will work with the PCWA to complete the application. Since this process may take some time, the model policy also states that once this process is completed, the referral will be placed on the application using the date and time of the original referral.
  + The PHA may, but is not required to, adopt a preference for FYI in accordance with 24 CFR 982.207. A preference is not required because FUPFYI funding must be used, as required by appropriations law, for families and youths that meet the standard for FYI assistance. Therefore, the model policy does not adopt such a preference. If the PHA wishes to adopt such a preference, you should select Option 2 and edit the model policy in Section 4-III.C. to implement such a preference.
  + If the PHA has waiting list preferences, they apply in the selection of FYI applicants for an FYI voucher only in relation to other FYI applicants on the HCV waiting list. For example, if the PHA has a residency preference and FYI applicant A qualifies for that preference, but FYI applicant B does not, then FYI applicant A must be selected first from the HCV waiting list when an FYI voucher becomes available. On the other hand, the PHA must select an FYI applicant for an FYI voucher (when available) even if the next person on the HCV waiting list is a regular HCV applicant that qualifies for a preference that the FYI applicant does not.
  + If a PHA selects applicants from the HCV waiting list based on a random drawing, an FYI applicant would be selected before another FYI applicant that applied earlier.
  + If the PHA’s HCV waiting list is closed, the PHA must open its HCV waiting list in order to accept new FYI applicants. If necessary, the PHA may open its waiting list solely for FYI applicants, but this information must be included in the PHA’s notice of opening its waiting list (see section 4-II.C., Opening and Closing the Waiting List of this administrative plan).
* If a PHA chooses to establish a separate FUP and FYI waiting list:
  + It must also place all FUP and FYI applicants on its regular HCV waiting list to the separate FUP and FYI waiting list in accordance with their respective position on the regular HCV waiting list.
  + A PHA should be able to identify all of the FUP and FYI applicants on its regular HCV waiting list, since the PHA must receive a referral and/or certification of eligible FUP or FYI status from the PCWA for each applicant. However, the PHA is encouraged to reach out to its partnering PCWA to verify that its list of FUP and FYI applicants is complete and accurate in accordance with their records. FUP and FYI applicants will not lose their position on the general HCV waiting list even though they will now also be placed on the separate FUP/FYI waiting list.
  + PHAs must establish their own policies regarding whether to remove the applicant from the general HCV waiting list upon being issued a FUP/FYI voucher.
  + PHAs should inform a youth, before choosing to receive a FUP or FYI voucher, of the time-limited nature of the voucher assistance and whether the youth will be able to remain on the general HCV waiting list.
  + If a PHA chooses to create a separate FUP and FYI waiting list, the PHA must ensure that all families on its HCV waiting list are informed of the separate FUP and FYI waiting list and also have an opportunity to be placed on the list should the partnering PCWA certify to their eligibility for these special purpose vouchers.
  + PHAs must also inform individuals on the HCV waiting list of the separate FUP and FYI waiting list by either posting the information to their website or providing public notice in their communities.
  + PHAs must ensure effective communication of notice is provided by taking a combination of actions, which may include:
    - Ensuring outreach to organizations serving youth, families, and other service organizations so there is widespread awareness of the availability of a separate waiting list and how to access this resource;
    - Providing information on social media sites; and
    - Other communication methods.
  + While the PHA will already know about FUP or FYI-eligible families because of the required certification/referral process, this notice will ensure that if there are any other applicants on the general HCV waiting list that would also qualify, that they are made aware of and have an opportunity to be placed onto the separate waiting list.
  + When providing notice, the PHA must describe the eligibility criteria for FUP and FYI vouchers and describe the actions an individual should take to be added to the FUP and FYI waiting list. The PHA notice should also make clear to applicants that if they decide to be included on the FUP and FYI waiting list, they will not lose their position on the HCV waiting list. PHAs must allow sufficient time for the communication of notice described above before issuing vouchers from the separate FUP and FYI waiting list. In the interim, PHAs may continue to use their HCV waitlist for issuing FUP and FYI vouchers.
  + If a PHA chooses to create a separate FUP and FYI waiting list, PHAs may use date and time of application in selecting an applicant from the FUP and FYI waiting list among applicants with the same preference status in accordance with the PHA’s administrative plan. Alternatively, a drawing or other random choice technique may be used, when determination of the date and time cannot be established between applicants with the same preferences, that both qualify to be selected next from the waiting list. For PHAs that rely on the date and time of application in determining the order in which an applicant is selected from the FUP and FYI waiting list, HUD is waiving 982.207(c)(1) and establishing as an alternative requirement that the application date and time of the applicant’s prior HCV application must be used for those FUP and FYI applicants that are already on the HCV waiting list. For example, if the PHA uses the date of application to determine the order of selection for applicants who qualify for the same FUP and FYI waiting list local preference, the date used to determine an applicant’s place on the waiting list compared to other applicants who qualify for that preference is the date of their application for the HCV program. However, the order in which an applicant may be reached on the FUP and FYI waiting list compared to the regular HCV waiting list may be different depending on the local preferences the PHA establishes for the FUP and FYI waiting list.
  + Selection from the separate FUP and FYI waiting list must be in accordance with local nondiscriminatory preferences that the PHA establishes for FUP and FYI applicants. This may result in the selection of an applicant from the FUP and FYI waiting list who was not previously on the HCV waiting list ahead of those who were on the HCV waiting list based on the applicant’s eligibility for a FUP and FYI waiting list preference.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will not maintain a separate waiting list for FUP and FYI vouchers.

Within 10 business days of receiving the referral from the PCWA, the PHA will review the HCV waiting list and will send the PCWA a list confirming whether or not referrals are on the waiting list.

Referrals who are already on the list will retain their position and the list will be notated to indicate the family or youth is FYI-eligible.

For those referrals not already on the waiting list, the PHA will work with the PCWA to ensure they receive and successfully complete a pre-application or application, as applicable. Once the pre-application or application has been completed, the PHA will place the referral on the HCV waiting list with the date and time of the original referral and an indication that the referral is FYI-eligible.

If the PHA’s HCV waiting list is closed, the PHA will open its HCV waiting list in order to accept new FYI applicants. If necessary, the PHA may open its waiting list solely for FYI applicants, but this information must be included in the PHA’s notice of opening its waiting list (see section 4-II.C., Opening and Closing the Waiting List of this administrative plan).

🞎 *Option 2*: *Delete the model plan language. Complete and insert the language below.*

The PHA will place all FUP and FYI on both the HCV waiting list and a separate FUP and FYI waiting list in accordance with their respective position on the regular HCV waiting list. FUP and FYI applicants will not lose their position on the general HCV waiting list even though they are also placed on the separate FUP and FYI waiting list. The PHA will not remove the applicant from the general HCV waiting list upon being issued a FUP/FYI voucher.

The PHA will ensure that all families on its HCV waiting list are informed of the separate FUP and FYI waiting list by posting the information on the PHA’s website. Families will have an opportunity to be placed on the list should the partnering PCWA certify to their eligibility for these special purpose vouchers. In addition, the PHA will conduct outreach to organizations serving youth, families, and other service organizations so there is widespread awareness of the availability of a separate waiting list and how to access this resource and provide information on the PHA’s social media sites. When providing notice, the PHA will describe the eligibility criteria for FUP and FYI vouchers and describe the actions an individual should take to be added to the FUP and FYI waiting list. The PHA notice will also make clear to applicants that if they decide to be included on the FUP and FYI waiting list, they will not lose their position on the HCV waiting list.

The PHA will use date and time of application in selecting an applicant from the FUP and FYI waiting list. The application date and time of the applicant’s prior HCV application will be used for those FUP and FYI applicants that are already on the HCV waiting list.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Waiting List Selection [Notice PIH 2025-08]**

This section describes how FYI-eligible youths are selected from the PHA’s waiting list. In addition, the PHA may establish separate preferences for FUP and FYI applicants.

**☑ Decision Point: Will the PHA establish separate preferences for FUP and FYI applicants?**

### Things to Consider

* While PHAs may establish local preferences based on local housing needs and priorities (24 CFR 982.207(a)), HCV regulations do not permit PHAs to establish separate preferences for FUP and FYI applicants. Preferences apply to all applicants on the waiting list. HUD is waiving 24 CFR 982.207(a)(1) and establishing an optional waiver permitting PHAs to establish separate preferences for FUP and FYI applicants.
* PHAs must ensure that their system of local preferences and processes for accepting referrals from partners does not violate nondiscrimination requirements under any applicable federal civil rights law, including but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Age Discrimination Act.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will not apply separate preferences to FUP and FYI applicants.

🞎 *Option 2*: *Delete the model plan language. Complete and insert the language below.*

The PHA will apply the following local preferences to FUP and FYI applicants: **[Insert a description of preferences]**

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-II.F. PHA HCV ELIGIBILITY DETERMINATION [FYI FAQs]**

**☑ Decision Point: Will the PCWA provide criminal information to the PHA during the referral process, and will the PHA consider this information in making its eligibility determination?**

### Things to Consider

* HUD regulations do not impose an obligation on PCWAs to provide information regarding an applicant’s criminal history to the PHA.
* However, HUD has stated that it is in the best interest of the PHA and the PCWA for this information to be made known to the PHA during the referral process, subject to any privacy laws, since an applicant’s criminal history could make the applicant ineligible for assistance under PHA policy.
* PCWAs may also possess information as to whether the applicant is participating in or has successfully completed a supervised drug or alcohol rehabilitation program. Such details may be helpful to the PHA in determining an applicant’s eligibility and may result in the applicant being determined eligible under PHA policy.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

Subject to privacy laws, the PCWA will provide any available information regarding the applicant’s criminal history to the PHA.

The PHA will consider the information in making its eligibility determination in accordance with the PHA’s policies in Chapter 3, Part III.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Additional Eligibility Factors**

This section describes additional FYI eligibility factors.

**☑ Decision Point: How will ineligible applicants be notified?**

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

Any applicant that does not meet the eligibility criteria for the HCV program listed in Chapter 3 or any eligibility criteria listed in this section will be notified by the PHA in writing following policies in 3-III.F, including stating the reasons the applicant was found ineligible and providing an opportunity for an informal review.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-II.G. LEASE UP [FR Notice 1/24/22]**

Once the PHA determines that the family or youth meets HCV eligibility requirements, the youth will be issued an FYI voucher in accordance with PHA policies.

**Briefings [FR Notice 1/24/22]**

**☑ Decision Point: Will the PHA implement any additional policies for FYI applicants with regard to lease-up?**

### Things to Consider

* During the family briefing, PHAs must inform the FYI voucher holder of [FR Notice 1/24/22]:
  + The extension of assistance provisions and requirements;
  + The availability of the FSS program and offer them an FSS slot, if available, or offer to place them on the FSS waiting list (provided the PHA has an FSS program); and
  + The supportive services available to them, the existence of any other programs or services, and their eligibility for such programs and services. However, participation in supportive services cannot be required as a condition of receiving FYI assistance.
* Option 1 states that they will be briefed individually rather than in a group briefing. This allows the PHA time to discuss the above topics and ensure that youth fully understand these special program components. If the PHA does not wish to brief youth separately, the PHA should amend the policy in Option 1.
* Further, while HUD does not require that additional search time be given, in order to ensure that FYI voucher holders lease up successfully, Option 1 states that an FYI voucher holder will be given one additional extension. This language will need to be edited if the PHA has amended the policy in Section 5-II.E. of the administrative plan or if the PHA does not wish to give any additional automatic extensions to FYI voucher holders.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

Eligible applicants will be notified by the PHA in writing following policies in 3-III.F. of this policy. FYI youth will be briefed individually. The PHA will provide all aspects of the written and oral briefing as outlined in Part I of Chapter 5.

Vouchers will be issued in accordance with PHA policies in Chapter 5, Part II, except that the PHA will consider one additional 30-day extension beyond the first automatic extension for any reason, not just those listed in the policy in Section 5-II.E.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Voucher Issuance [Notice PIH 2025-08]**

**☑ Decision Point: What are the PHA’s policies on the initial and extension terms of the voucher?**

### Things to Consider

* The initial search term for FYI vouchers must be at least 120 days from the date the voucher is issued. The initial 120-day term also applies when a youth chooses to move to a new unit with continued assistance inside or outside the PHA’s jurisdiction.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

All FYI vouchers will have an initial term of 120 calendar days. The PHA will notify the applicant in writing via email and/or through a phone call at least 30 days prior to the expiration of the initial term of the voucher and inquire if the applicant is in need of assistance with their housing search. The PHA will also remind the applicant of the housing search assistance that is available to them as set forth in the PHA’s partnership agreements.

Upon written or oral request of the applicant (either through an email, phone call, or through a written form), the PHA will automatically approve one 90-day extension to the initial voucher term as long as the request is made prior to the expiration date of the initial voucher term. Subsequent requests for extensions will follow PHA policies on voucher extensions found in Chapter 5. This includes granting additional extensions as needed as a reasonable accommodation.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Turnover**

This section describes requirements for turnover of FYI vouchers. **No policy decisions are required.**

**19-II.H. MAXIMUM ASSISTANCE PERIOD [Notice PIH 2023-04; FYI FAQs****; FR Notice 1/24/22]**

FYI vouchers are limited by statute to a total of between 36 months and 60 months of housing assistance. At the end of the statutory time period, assistance must be terminated. However, any period of time for which no subsidy (HAP) is being paid on behalf of the youth does not count toward the limitation. It is not permissible to reissue another FYI TPV to the same youth upon expiration of their FYI assistance.

Participants do not “age out” of the program. A participant may continue with the program until they have received the period of assistance for which they are eligible. Age limits are only applied for entry into the program.

**Extension of Assistance**

FYI voucher holders who first leased or lease a unit after December 27, 2020, may be eligible for an extension of assistance up to 24 months beyond the 36-month time limit (for a total of 60 months of assistance). **No policy decisions are required.**

**Statutory Exceptions**

FYI voucher holders will be entitled to receive an extension of assistance for up to 24 months beyond the 36-month time limit without participating in the PHA’s FSS program if they certify that they meet on of the exceptions below.

***Exception 1: The FYI voucher holder is a parent or other household member responsible for the care of a dependent child under the age of six or for the care of an incapacitated person.***

**☑ Decision Point: How will the PHA define *incapacitated person*?**

### Things to Consider

* HUD does not define the term *incapacitated person* but is providing PHAs with flexibility in applying this requirement.
* HUD states that PHAs may choose to apply the definition of *incapacitated person* that has been established under state or local law. Because of this, Option 1 requires the PHA to insert this definition.
* HUD encourages PHAs to apply this exception in a manner that provides extensions of assistance to the broadest population possible consistent with the statutory requirements. Option 1 uses this language in order to allow the PHA to consider a broad range of possibilities.
* The statute does not require that the child or incapacitated person reside in the household in order for the FYI voucher holder to certify that they meet this exception.
* For example, an FYI voucher holder may submit a certification on the basis that they are responsible for the care of a dependent child under the age of six even if the child resides in the household only part of the time due to a shared custody arrangement.
* Similarly, an FYI voucher holder may submit this certification on the basis that they are responsible for the care of an incapacitated person, such as an elderly relative, even if the incapacitated person does not reside in the household.

**CAUTION:** **You must insert information here. The model plan does not contain language that can be adopted as-is.**

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA defines incapacitated person **as [insert definition under state and local law]**. The PHA will apply this exception in a manner that provides extensions of FYI assistance to the broadest population possible consistent with the statutory requirements.

The FYI voucher holder will be required to self-certify that they meet this exception on a PHA-provided form. This certification is the only documentation that the FYI voucher holder must submit.

The child or incapacitated person is not required to reside in the household in order for the FYI voucher holder to certify they meet this exception. For example, a child in a joint custody arrangement under the age of six who resides in the household only part time may qualify the FYI voucher holder for this exception.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

***Exception 2: The FYI voucher holder is a person who is regularly and actively participating in a drug addiction or alcohol treatment and rehabilitation program.***

**☑ Decision Point: How will the PHA define *regular and active participation* in a drug addiction or alcohol rehabilitation program?**

### Things to Consider

* HUD does not define the term *regular and active participation*.
* Option 1 uses this language in order to allow the PHA to consider a broad range of possibilities.
* Since the only form of verification required is a self-certification, the model policy language does not state that the PHA will verify attendance in such programs.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will define *regular and active participation* in a manner that provides extensions of FYI voucher holder assistance to the broadest population possible consistent with the statutory requirements.

The FYI voucher holder will be required to self-certify that they meet this exception on a PHA-provided form. This certification is the only documentation that the FYI voucher holder must submit.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

***Exception 3: The FYI voucher holder is a person who is incapable of complying with the requirement to participate in a FSS program as described above or engage in education, workforce development, or employment activities as described below, as applicable, due to a documented medical condition.***

**☑ Decision Point: How will the PHA define *medical conditions*?**

### Things to Consider

* HUD is not defining the types of medical conditions that may meet this requirement but is providing PHAs with flexibility in applying this requirement.
* HUD encourages PHAs to apply this exception in a manner that provides extensions of FUPY/FYI assistance to the broadest population possible consistent with the statutory requirements.
* Option 1 uses this language in order to allow the PHA to consider a broad range of possibilities.
* Since the only form of verification required is a self-certification, the model policy language does not state that the PHA will verify the existence of such conditions beyond a self-certification.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will apply this requirement in a manner that provides extensions of FYI voucher holder assistance to the broadest population possible consistent with statutory requirements.

The FYI voucher holder will be required to self-certify that they meet this exception on a PHA-provided form. This certification is the only documentation that the FYI voucher holder must submit.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Education, Workforce Development, or Employment Activities**

A PHA’s policies implementing its education, workforce development, and employment requirements must be included in its administrative plan.

If a PHA that carries out an FSS program is unable to offer an FYI voucher holder an FSS slot during their first 36 months of receiving FYI assistance, the FYI voucher holder is considered to have been “unable to enroll” in the program and may have their voucher extended by meeting the education, workforce development, or employment criteria described below:

***Criterion 1: The FYI voucher holder was engaged in obtaining a recognized postsecondary credential or a secondary school diploma or its recognized equivalent.***

**☑ Decision Point: How will the PHA define *recognized postsecondary credential* and *secondary school diploma or recognized equivalent?***

### Things to Consider

* While HUD does not define this term, FR Notice 1/24/22 states that PHA may use the definitions of *recognized postsecondary credential* and *secondary school diploma or its recognized equivalent* under the Workforce Innovation and Opportunity Act (WIOA). As such, Option 1 adopts this definition.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will use the definitions of *recognized postsecondary credential* and *secondary school diploma or its recognized equivalent* under the Workforce Innovation and Opportunity Act (WIOA). WIOA defines a recognized postsecondary credential as a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state involved or federal government, or an associate or baccalaureate degree (29 U.S.C. 3102). Examples of a recognized postsecondary credential include, but are not limited to, an associate’s degree, bachelor’s degree, occupational licensure, or occupational certification (see U.S. Department of Labor, Training and Employment Guidance Letter No. 10–16, Change 1). For the purpose of WIOA, the U.S. Department of Labor defines a *secondary school diploma or its recognized equivalent* as a secondary school diploma (or alternate diploma) that is recognized by a state and that is included for accountability purposes under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA). A secondary school equivalency certification signifies that a student has completed the requirement for a high school education. Examples of a secondary school diploma or its recognized equivalent include, but are not limited to, obtaining certification of attaining passing scores on a state-recognized high school equivalency test, earning a secondary school diploma or state-recognized equivalent, or obtaining certification of passing a state-recognized competency-based assessment.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

***Criterion 2: The FYI voucher holder was enrolled in an institution of higher education, as such term is defined in section 101(a) of the Higher Education Act of 1965 (20 U.S.C. 1001(a)) or an institution that meets the definition of a proprietary institution of higher education or a postsecondary vocational institution under sections 102(b)(1) and (c)(1) of the Higher Education Act of 1965 (20 U.S.C. 1002(b)(1) and (c)(1)), respectively.***

**☑ Decision Point: Will the PHA define a minimum number of classes or credits that an FYI voucher holder must be enrolled in in order to receive an extension of assistance?**

### Things to Consider

* The statute does not establish a minimum number of classes or credits that an FYI voucher holder must be enrolled in in order to receive an extension of FUPY/FYI assistance under this provision. Conversely, the PHA is not prohibited from establishing such minimum requirements. Therefore, a PHA may, but is not required, to establish a minimum number of classes or credits that an FYI voucher holder must be enrolled in in order to receive an extension of assistance under this provision.
* However, HUD strongly encourages PHAs to establish policies that provide extensions of FUPY/FYI assistance for FYI voucher holders that were engaged in such activities on a part-time basis as long as they meet the requirement to engage in such activities for not less than nine months of the 12-month period preceding each extension.
* If a PHA chooses to establish minimum requirements, HUD encourages the PHA to establish policies that would allow them to make exceptions to such requirements for circumstances beyond the FYI voucher holder’s control. Option 1 makes such an exception.
* For example, a PHA may establish a requirement that an FYI voucher holder must be enrolled in education activities on at least a half-time basis but may make exceptions to this requirement if the FYI voucher holder is unable to enroll in a sufficient number of classes due to a lack of course offerings by the educational institution where they are enrolled.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The FYI voucher holder must be enrolled in education activities on at least a half-time basis, as defined by the institution which they attend. However, the PHA may make exceptions to this requirement if the FYI voucher holder is unable to enroll in a sufficient number of classes due to a lack of course offerings by the educational institution where they are enrolled.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

***Criterion 3: The FYI voucher holder was participating in a career pathway, as such term is defined in Section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102).***

No policy decisions are required.

***Criterion 4: The FYI voucher holder was employed.***

**☑ Decision Point: Will the PHA define a minimum number of classes or credits that an FYI voucher holder must be enrolled in in order to receive an extension of assistance?**

### Things to Consider

* The statute does not establish a minimum number of hours an FYI voucher holder must work in order to receive an extension of FUPY/FYI assistance under this provision. Conversely, the PHA is not prohibited from establishing such minimum requirements. Therefore, a PHA may, but is not required, to establish a minimum number of hours that an FYI voucher holder must work in order to receive an extension of assistance under this provision.
* However, HUD strongly encourages PHAs to establish policies that provide extensions of FUPY/FYI assistance for FYI voucher holders that were engaged in such activities on a part-time basis as long as they meet the requirement to engage in such activities for not less than nine months of the 12-month period preceding each extension. Because of this, the model policy defines *employment* as 20 hours a week, as this is usually considered part-time.
* If the PHA chooses not to define a number of hours for work activities, the PHA should select Option 2.
* If a PHA chooses to establish minimum requirements, HUD encourages the PHA to establish policies that would allow them to make exceptions to such requirements for circumstances beyond the FYI voucher holder’s control.
* For example, a PHA may establish a requirement that an FYI voucher holder must work a minimum number of hours per week but may make exceptions to this requirement if the FYI voucher holder’s hours are reduced due to circumstances beyond their control or the FYI voucher holder must temporarily reduce their work hours due to a family emergency. Option 1 makes such an exception.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will consider the FYI voucher holder to be employed if they work a minimum of 20 hours per week. The PHA may make exceptions to this requirement if the FYI voucher holder’s hours are reduced due to circumstances beyond their control or the FYI voucher holder must temporarily reduce their work hours due to a verified family emergency.

🞎 *Option 2*: *Edit the model plan language or delete it and insert the language below.*

The PHA will not define a number of hours that the youth must be employed.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**FSS Enrollment at 24 Months**

If the FYI voucher holder has not been provided an opportunity to enroll in the FSS program during the first 24 months of FYI assistance, HUD encourages the PHA to remind the FYI voucher holder at the 24-month reexamination of the education, workforce development, and employment requirements described above so that they have enough time to meet these requirements prior to the expiration of the 36-month time period for FYI assistance.

**☑ Decision Point: Will the PHA remind the FYI voucher holder of education workforce development, and employment requirements at the 24-month reexam?**

### Things to Consider

* Since HUD encourages PHAs to remind FYI voucher holders at their 24-month reexamination of the education, workforce development, and employment requirements, the model policy adopts this suggestion.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

If the FYI voucher holder has not been provided an opportunity to enroll in the FSS program during the first 24 months of FYI assistance, the PHA will remind the FYI voucher holder at their second regular reexamination of the education, workforce development, and employment requirements described above.

🞎 *Option 2:* *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**FSS Enrollment Between 36 and 48 Months**

This section discusses FSS enrollment between 36 and 48 months. **No policy decisions are required.**

**FSS Enrollment After 48 Months**

The PHA may, but is not required, to offer an FYI voucher holder an FSS slot that becomes available between the 48-month mark and the 60-month mark.

**☑ Decision Point: Will the PHA offer an FSS slot that becomes available between the 48-month and 60-month mark?**

### Things to Consider

* Since the FYI voucher holder will have already received their second and final extension, Option 1 states that the PHA will not offer the FSS slot to the FYI voucher holder.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

If an FSS slot becomes available between the 48 and 60-month marks, the PHA will not offer the FSS slot to an FYI voucher holder.

🞎 *Option 2:* *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Extensions of Assistance**

This section discusses requirements for extension of assistance. **No policy decisions are required.**

**No FSS Program or Unable to Enroll in FSS**

This section discusses situations that arise when the PHA does not have an FSS program or is unable to enroll the FYI voucher holder in the FSS program. **No policy decisions are required.**

**Verification Prior to Annual Reexam**

In order to provide an extension of assistance, the PHA must verify compliance with the above requirements at the end of the 36-month time period and the 48-month time periods. The PHA does not need to verify compliance with these requirements at the end of the 60-month time period since the maximum length of assistance is 60 months.

**☑ Decision Point: How will the PHA verify compliance?**

### Things to Consider

* To verify compliance with the FSS requirement, the PHA must examine its records to confirm, or obtain confirmation from the PHA’s FSS program staff, that the FUPY/FYI participant is in compliance with FSS program requirements and has not been terminated from the FSS program.
* The PHA must provide the FYI voucher holder written notification informing them that they may receive an extension of their FYI assistance if they meet one of the statutory conditions and providing instructions on how the FYI voucher holder may demonstrate that they meet one of these conditions. This notification must be provided sufficiently in advance of the end of the 36-month time period or 48-month time period, as applicable, to allow the FYI voucher holder to demonstrate that they meet one of these statutory conditions and for the PHA to conduct an annual reexamination prior to the expiration of the FYI assistance. Therefore, Option 1 states that written notice will be sent 60 days prior to the scheduled reexamination date.
* In order for the FYI voucher holder to meet the education, workforce development, or employment requirement, the FYI voucher holder must demonstrate to the PHA that they were engaged in at least one education, workforce development, or employment activity for at least nine months of the 12-month period immediately preceding the end of the 36-month or 48-month time period, as applicable. Due to the timing of when the PHA verifies compliance and conducts the annual reexamination, the FYI voucher holder may have not yet met the nine-month requirement but may be able to demonstrate that they will meet the nine-month requirement as of the end of the 36-month or 48-month time period. In such cases, the FYI voucher holder will still be considered to have met the requirements. The model policy adopts this language.
* In order for the FYI voucher holder to meet one of the statutory exceptions, they must submit a certification to the PHA that they meet one of these exceptions. This certification is the only documentation that the FYI voucher holder must submit in order to demonstrate that they meet one of these exceptions. The model policy states this in Option 1 to make clear that no additional documentation will be required.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will verify compliance with the education, workforce development, or employment requirement, or one of the statutory exceptions, at the end of the 36-month and 48-month time periods prior to the FYI voucher holder’s scheduled annual reexamination. The PHA will not verify compliance at the end of the 60-month time period.

The PHA will provide each FYI voucher holder on the PHA’s program with a written notification informing them that they may receive an extension of their FYI assistance if they meet conditions outlined in this chapter and providing them with instructions on how they may demonstrate compliance at least 60 days prior to their scheduled annual reexamination date. When necessary, the PHA will provide this notification in a format accessible to FYI voucher holders with disabilities and in a translated format for FYI voucher holders with limited English proficiency in accordance with Chapter 2.

The PHA will use the following verification methods to verify an FYI voucher holder’s eligibility for voucher extensions:

To verify compliance with the FSS requirement, the PHA will examine its records to confirm, or obtain confirmation from the PHA’s FSS program staff, that the FYI participant is in compliance with FSS program requirements and has not been terminated from the FSS program.

To meet the education, workforce development, or employment requirement, the PHA will verify that the FUP youth was engaged in at least one education, workforce development, or employment activity for at least nine months of the 12-month period immediately preceding the end of the 36-month or 48-month time period, as applicable.

Due to the timing of when the PHA verifies compliance and conducts the annual reexamination, the FYI voucher holder may have not yet met the nine-month requirement but may be able to demonstrate that they will meet the nine-month requirement as of the end of the 36-month or 48-month time period. In such cases, the FYI voucher holder will still be considered to have met the requirements.

In order for the FYI voucher holder to meet one of the statutory exceptions described above, the FYI voucher holder must submit a certification to the PHA that they meet one of these exceptions. This certification is the only documentation that the FYI voucher holder must submit in order to demonstrate that they meet one of these exceptions.

🞎 *Option 2:* *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Termination of Assistance for Failure to Meet Conditions**

This section discusses termination of assistance. **No policy decisions are required.**

**19-II.I. TERMINATION OF ASSISTANCE [FYI FAQs]**

Termination of an FYI voucher must be consistent with regulations for termination in 24 CFR Part 982, Subpart L, and be in compliance with PHA policies in Chapter 12.

The PHA may not transfer the assistance of an FYI voucher holder to regular HCV assistance upon the expiration of the time limit on assistance. However, the PHA may issue a regular HCV to an FYI voucher holder if they were selected from the waiting list in accordance with PHA policies and may also adopt a preference for FYI voucher holders who are being terminated for this reason.

**☑ Decision Point: Will the PHA offer a preference to FYI voucher holders upon expiration of the time limit on assistance?**

### Things to Consider

* The PHA 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 their termination from the program, or other similar category.
* PHAs may work collaboratively with PCWAs in developing a transitional plan to help prepare youths for the eventual expiration of their time limit of FYI assistance. PHAs also have the option of using a preference.
* If the PHA adopts a selection preference for FYI youth who are terminated due to the time limit on assistance, the PHA should select Option 2. The PHA must also edit the model policy in Section 4-III.C. to reflect this policy.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will not provide a selection preference on the PHA’s HCV waiting list for FYI voucher holders who are terminated due to the time limit on assistance.

🞎 *Option 2*: *Delete the model plan language and insert the language below.*

The PHA will provide a selection preference for FYI voucher holders who are terminated due to the time limit on assistance in accordance with PHA policy in Section 4-III.C. of the administrative plan.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-II.J. PORTABILITY [FYI FAQs]**

Portability for FYI vouchers is handled the same was as for a regular HCV family. **No policy decisions are required.**

**19-II.K. PROJECT-BASING FYI VOUCHERS [FYI FAQs; FR Notice 1/24/22; Notice PIH 2024-03]**

This section states the PHA may be eligible to project-base FYI vouchers.

**☑ Decision Point: Will the PHA project-base eligible FYI vouchers?**

### Things to Consider

* FYI TPVs that were awarded under Notice PIH 2019–20 are prohibited from project-basing. If the PHA was awarded FYI TPVs under this notice, Option 1 must be selected.
* PHAs awarded FYI vouchers under Notices PIH 2020-28, PIH 2021-26, or PIH 2023-04 that have initiated the selection process to project-base FYI and/or FUP vouchers may be eligible to project-base FYI and FUP units if the required criteria are met.
* If the PHA was awarded FYI vouchers under Notices PIH 2020-28, PIH 2021-26, or PIH 2023-04, and the PHA will not project-base FYI assistance, the PHA should select Option 1.
* If the PHA will project-base all or a portion of its FYI vouchers awarded under Notices PIH 2020-28, PIH 2021-26, or PIH 2023-04, the PHA should select Option 2.
* If the PHA chooses to project-based FYI vouchers, the PBV percentage limitation and the income-mixing requirement have been amended for units that house eligible youth receiving FYI assistance.
* HUD requires that the HAP contract must formally identify the PBV units made available to FYI voucher holders in order for the unit to be covered.
* In order to make PBV units specifically available to FYI voucher holders, the PHA must also amend its administrative plan to include limitations of these units to eligible youth. Option 2 provides this language.
* Certain PBV units that house eligible youth receiving FYI assistance are eligible for the 10 percent exception authority described in Chapter 17, Additional Project-Based Units. Option 2 assumes the PHA has project-based units under this authority. If this is not the case, language related to this exception should be removed.
  + PBV units that house eligible youth receiving FYI assistance may only be covered by this 10 percent exception authority if the units are under a HAP contract that became effective after December 27, 2020, and if the unit is occupied by an eligible youth receiving FYI assistance.
  + In contrast, units added after December 27, 2020, through an amendment of a HAP contract that became effective on or prior to December 27, 2020, are not eligible for this 10 percent exception authority.
  + The PBV unit specifically made available to FYI youth, as applicable, will apply under the 10 percent exception authority as long as an eligible youth receiving FYI assistance resides in the unit.
    - Therefore, prior to project-basing an FYI voucher under this 10 percent exception authority, the PHA must plan for how it will maintain compliance with this 10 percent exception authority once the FYI assistance has expired for a particular youth who has leased the unit.
    - In order for the unit to remain under the FYI exception authority, the youth must vacate the unit once their FYI assistance has expired and the owner must lease the unit to another FYI youth. If the youth does not move from the unit upon the expiration of their FYI assistance, at that time the PHA must take one of the following actions since the unit no longer qualifies for the FYI exception authority:
      * Remove the unit from the HAP contract. The PHA would remove the unit from the HAP contract if the youth remains in the unit without assistance or with non-FYI tenant-based assistance. The unit may be added back to the contract per 24 CFR 983.207(b) if the youth later moves from the unit;
      * Amend the HAP contract to substitute the youth’s current unit for another unit in the building if it is possible to do so in accordance with 24 CFR 983.207(a). Such a substitution will result in the other unit in the building being covered by the FYI 10 percent exception authority. A PHA may, but is not required to, in conjunction with such substitution add the youth’s current unit to the HAP contract if it is possible to do so in accordance with 24 CFR 983.207(b), as amended by HOTMA, including that such addition does not cause the PHA to exceed the program limitation or become noncompliant with the income mixing requirement (as described in the following section). If the youth’s current unit is not added to the HAP contract, the youth may remain in the unit without assistance or with non-FYI tenant-based assistance; or
      * Change the 10 percent exception authority category from FYI to one of the other 10 percent exception categories if the FYI youth, or the unit, happens to qualify for it, so long as the change is allowable under the income-mixing requirement.
* Certain PBV units that house eligible youth receiving FYI assistance are exempt from the project cap described in Section 17-II.F.
  + The statutory change excepting units that are exclusively made available to youth receiving FYI assistance from the project cap was effective December 27, 2020, and applies to vouchers that were not in use on behalf of an assisted family as of December 27, 2020. Therefore, units exclusively made available to youth receiving FYI assistance may be excepted from the project cap for HAP contracts first effective after December 27, 2020.
  + Owners under HAP contracts already in effect prior to the effective date of the January 18, 2017, HOTMA notice (i.e., April 18, 2017) are still obligated by the terms of those HAP contracts with respect to the requirements that apply to the number of excepted units in a multifamily project. The owner must continue to designate the same number of contract units and assist the same number of excepted families as provided under the HAP contract during the remaining term of the HAP contract unless the owner and the PHA mutually agree to change those requirements.
    - A PHA and owner may agree to add excepted units exclusively made available to FYI youth to an existing HAP contract or change the exception category of a current excepted unit to be a unit exclusively made available to FYI youth.
    - The PBV HAP contract may not be changed to include units exclusively made available to youth receiving FYI assistance if the change would jeopardize an assisted family’s eligibility for continued assistance at the project.
  + Excepted PBV units exclusively made available to FYI youth, as applicable, qualify as excepted as long as an eligible youth receiving FYI assistance resides in the unit. Prior to entering into a HAP contract that includes FUPY excepted units, the PHA must plan for how it will maintain compliance with the requirements for excepted units once the FYI assistance has expired for a particular youth who has leased the unit. In order for the unit to remain under the FYI excepted unit category, the youth must vacate the unit once their FYI assistance has expired and the owner must lease the unit to another FUP youth. If the youth does not move from the unit upon the expiration of their FYI assistance, at that time the PHA must take one of the following actions in order to maintain compliance with the income-mixing requirement:
    - Remove the unit from the HAP contract if the youth remains in the unit without assistance or with non-FYI tenant-based assistance. The unit may be added back to the contract per 24 CFR 983.207(b) if the youth later moves from the unit;
    - Amend the HAP contract to substitute the youth’s current unit for another unit in the building if it is possible to do so in accordance with 24 CFR 983.207(a). Such a substitution will result in the other unit in the building being covered by the FYI excepted unit category. A PHA may, but is not required to, in conjunction with such substitution add the youth’s current unit to the HAP contract if it is possible to do so in accordance with 24 CFR 983.207(b), as amended by HOTMA, including that such addition does not cause the PHA to exceed the program limitation or become noncompliant with the income-mixing requirement. If the youth’s current unit is not added to the HAP contract, the youth may remain in the unit without assistance or with non-FYI tenant-based assistance; or
    - Amend the HAP contract to change the excepted unit category from FYI to another excepted unit category (such as supportive services) if the FYI youth, or the unit, happens to qualify for it, or change the unit to a non-excepted unit if doing so is allowable under the income-mixing requirement. Such a change in the form of PBV assistance used in the unit is permissible only if it does not cause the PHA to exceed the program limitation.
  + A PHA should be aware that it may only allow the youth to remain in the unit with non-FUPY/FYI HCV assistance (either tenant-based or project-based, as applicable) if the youth was selected from the applicable waiting list in accordance with the policies set forth in the PHA’s administrative plan.
  + A PHA may, but is not required to, create a preference applicable to the PHA’s regular HCV and/or PBV waiting lists for persons whose FYI assistance is expiring and will have a lack of adequate housing as a result of their termination from the program, or other similar category. However, as noted above, the unit will no longer qualify for the FYI excepted unit category if the youth remains in the unit with another form of HCV assistance after their FYI assistance has expired.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will not project-base FYI vouchers. All FYI vouchers will be used to provide tenant-based assistance.

🞎 *Option 2:* *Delete the model plan language. Complete and insert the language below.*

The PHA will project-base FYI vouchers in the following developments: **[insert names of developments]**

The HAP contract will specify that the PBV unit is specifically made available to FYI voucher holders.

Since the PHA has project-based units under the FYI exception authority, in order for the unit to remain under the FYI exception authority, the youth must vacate the unit once their FYI assistance has expired and the owner must lease the unit to another FYI voucher holder. If the FYI voucher holder does not move from the unit upon the expiration of their FYI assistance, at that time the PHA will take one of the following actions since the unit no longer qualifies for the FYI exception authority:

Remove the unit from the HAP contract if the youth remains in the unit without assistance or with non-FYI tenant-based assistance. The unit may be added back to the contract per 24 CFR 983.207(b) if the FYI voucher holder later moves from the unit;

Amend the HAP contract to substitute the youth’s current unit for another unit in the building if it is possible to do so in accordance with 24 CFR 983.207(a). Such a substitution will result in the other unit in the building being covered by the FYI 10 percent exception authority. The PHA may, but is not required to, in conjunction with such substitution add the youth’s current unit to the HAP contract if it is possible to do so in accordance with 24 CFR 983.207(b), as amended by HOTMA, including that such addition does not cause the PHA to exceed the program limitation or become noncompliant with the income-mixing requirement. If the youth’s current unit is not added to the HAP contract, the youth may remain in the unit without assistance or with non-FYI tenant-based assistance; or

Change the 10 percent exception authority category from FYI to one of the other 10 percent exception categories if the FYI voucher holder, or the unit, happens to qualify for it, so long as the change is allowable under the income-mixing requirement.

The PHA may allow the youth to remain in the unit with non-FYI HCV assistance (either tenant-based or project-based, as applicable) if the FYI voucher holder was selected from the applicable waiting list in accordance with PHA policies.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**PART III: VETERANS AFFAIRS SUPPORTIVE HOUSING (VASH) PROGRAM**

**19-III.A. PROGRAM OVERVIEW**

This section provides an overview of the HUD-VASH program. **No policy decisions are required.**

**19-III.B. REFERRALS [FR Notice 8/13/24 and HUD-VASH Qs and As]**

VAMC case managers refer eligible families to the PHA.

**☑ Decision Point: Will the PHA adopt any policies related to expediting the referral process?**

### Things to Consider

* HUD-VASH Best Practices – Version 1.0 is a document published in 2012 that asked PHAs and VAMCs that administer VASH to submit best practices for operating the program. In this document, HUD notes that the expeditious processing of HUD-VASH applications is important in establishing the relationship with the veteran and maintaining the connection and their belief that they can be housed. Partnering agencies have recognized this importance and have altered traditional practices in order to house HUD-VASH applicants as quickly as possible. A common denominator in these practices is the simultaneous completion of one or more tasks, which deviates from the linear, step-by-step methods that PHAs normally use to process applications.
* A very widespread practice is for the PHA to provide all forms and a list of documents required for the HUD-VASH application to the VAMC. Case managers work with Veterans to fill out the forms and compile all documents prior to meeting with the PHA and submitting applications. The PHA may ask the VA case managers to email copies of all documents prior to the meeting in order to review them (if PHA staff have time) and start a file for the Veteran. Option 1 of the model policy states that the PHA will do this in order to expediate the process. It further adds that eligibility screening will be performed within five business days of receipt of the VAMC referral. The model policy typically uses 10 business days as the default time period for PHA actions, but given the expedited process, Option 1 cuts this time in half. The PHA may increase or decrease this time period as necessary.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

In order to expedite the screening process, the PHA will provide all forms and a list of documents required for the VASH application to the VAMC. Case managers will work with veterans to fill out the forms and compile all documents prior to meeting with the PHA and submitting an application. When feasible, the VAMC case manager should email copies of all documents to the PHA prior to the meeting in order to allow the PHA time to review them and start a file for the veteran.

After the VAMC has given the PHA a complete referral, the PHA will perform an eligibility screening within five business days of receipt of a VAMC referral.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-III.C. HCV PROGRAM ELIGIBILITY** **[FR Notice 8/13/24]**

**Social Security Numbers**

This section clarifies requirements for verification of SSNs. **No policy decisions are required.**

**Proof of Age**

This section clarifies requirements for verification of age. **No policy decisions are required.**

**Photo Identification**

This section clarifies requirements for the use of photo identification. **No policy decisions are required.**

**Income Eligibility [FR Notice 8/13/24]**

While income-targeting does not apply to VASH vouchers, the PHA may, include the admission of extremely low-income VASH families in its income targeting numbers for the fiscal year in which these families are admitted.

**☑ Decision Point: Will the PHA include VASH vouchers in its income targeting numbers for the fiscal year in which families are admitted?**

### Things to Consider

* The income targeting requirement at 24 CFR 982.201(b)(2) that 75 percent of families admitted in a fiscal year be extremely low-income does not apply to VASH vouchers.
* To ensure that PHAs can effectively serve the eligible population of VASH families, homeless veterans at a range of income levels may be served under the VASH program, provided they still meet income limit requirements.
* Option 1 states that the PHA will include any extremely low-income VASH families it admits in its income targeting numbers for the fiscal year since these families are admitted to the program anyway.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

While income-targeting requirements will not be considered by the PHA when families are referred by the partnering VAMC, the PHA will include any extremely low-income VASH families that are admitted in its income targeting numbers for the fiscal year in which these families are admitted.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Screening [FR Notice 8/13/24]**

This section clarifies screening requirements. **No policy decisions are required.**

**Minimum Rent [FR Notice 8/13/24]**

**☑ Decision Point: What will be the minimum rent for VASH families?**

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will establish a minimum rent of $0 for VASH families.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Denial of Assistance [Notice PIH 2008-37]**

This section states the PHA must give prompt written notice of a denial and a copy of the notice must be sent to the VAMC case manager. **No policy decisions are required.**

**19-III.D. CHANGES IN FAMILY COMPOSITION**

**Adding Family Members [FR Notice 8/13/24]**

This section discusses requirements for adding family members. **No policy decisions are required.**

**Remaining Family Members** **[HUD-VASH Qs and As]**

This section discusses what happens when the veteran dies and other family members remain in the unit. **No policy decisions are required.**

**Family Break Up [HUD-VASH Qs and As]**

This section discusses who receives the voucher in the case of family break-up. **No policy decisions are required.**

**19-III.E. LEASING [FR Notice 8/13/24]**

**Waiting List**

This section states that PHA policies relating to the waiting list do not apply to VASH. **No policy decisions are required.**

**Exception Payment Standards [FR Notice 8/13/24]**

This section states that PHAs may establish exception payment standards specifically for VASH families. **No policy decisions are required.**

**Voucher Issuance [FR Notice 8/13/24]**

VASH vouchers must have an initial search term of at least 120 days.

🗹 **Decision Point: What is the time limit for the initial term of a VASH voucher?**

Things to Consider

* Unlike in the standard HCV program where the minimum initial voucher term is 60 calendar days, VASH vouchers must be issued for a minimum initial term of at least 120 days. There is no maximum initial voucher term.
* The PHA should consider the local housing market when establishing policies governing the voucher term. In areas where the vacancy rate is low and renters compete for affordable units, it is likely to take voucher holders longer to locate an approvable unit. PHAs in these areas may wish to establish a longer initial term for the voucher.
* All other PHA policies on extensions and suspension of vouchers apply.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

All VASH vouchers will have an initial term of 120 calendar days.

The family must submit a Request for Tenancy Approval and proposed lease within the 120-day period unless the PHA grants an extension.

🞎 *Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Special Housing Types** **[FR Notice 8/13/24]**

The PHA must permit VASH clients to use certain special housing types for tenant-based VASH assistance, regardless of whether these types are permitted in the administrative plan for other families. **No policy decisions are required.**

**Initial Lease Term [FR Notice 8/13/24]**

VASH voucher holders may enter into an initial lease that is for less than 12 months. **No policy decisions are required.**

**Ineligible Housing [FR Notice 8/13/24]**

VASH families are permitted to live on the grounds of a VA facility in units developed to house homeless veterans. **No policy decisions are required.**

**Pre-Inspections [FR Notice 8/13/24]**

PHAs may pre-inspect available units that veterans may be interested in leasing in order to maintain a pool of eligible units.

🗹 **Decision Point: Will the PHA pre-inspect VASH units?**

Things to Consider

* To expedite the leasing process, PHAs may pre-inspect available units that veterans may be interested in leasing in order to maintain a pool of eligible units.
* Option 1 says the PHA may pre-inspect units in order to give the PHA flexibility to do so. Since most PHAs wish to expedite the lease-up process for VASH, it also states that for all other inspections unrelated to pre-inspections, the PHA will make every effort to fast track inspections.
* If the PHA does not wish to conduct any pre-inspections of available units, the PHA should select Option 2.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

To expedite the leasing process, the PHA may pre-inspect available units that veterans may be interested in leasing, in order to maintain a pool of eligible units. If a VASH family selects a unit that passed a pre-inspection (without intervening occupancy) within 45 days of the date of the RTA, the unit may be approved, provided that it meets all other conditions under 24 CFR 982.305. The veteran will be free to select their unit.

When a pre-inspected unit is not selected, the PHA will make every effort to fast-track the inspection process, including adjusting the normal inspection schedule for both initial and any required reinspections.

🞎 *Option 2: Delete the model plan language and insert the language below.*

The PHA will not conduct any pre-inspections of available units.

🞎 *Option 3: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-III.F. PORTABILITY [Notice PIH 2011-53 and FR Notice 8/13/24]**

**General requirements**

This section provides an overview of general requirements for portability of VASH vouchers. **No policy decisions are required.**

**Portability within the Initial VAMC or DSP’s Catchment Area**

This section discusses portability within the initial VAMC’s catchment area. **No policy decisions are required.**

**Portability Outside of the Initial VAMC or DSP’s Catchment Area**

This section discusses portability outside of the initial VAMC’s catchment area. **No policy decisions are required.**

**Portability Outside the Initial VAMC or DSP’s Catchment Area under VAWA**

This section discusses portability outside of the initial VAMC or DSP’s catchment area when the veteran is requesting to port to protect the health and safety of a person who is a victim or domestic violence, dating violence, sexual assault, stalking, or human trafficking. **No policy decisions are required.**

**19-III.G. TERMINATION OF ASSISTANCE [FR Notice 8/13/24]**

With the exception of terminations for failure to receive case management, HUD has not established any alternative requirements for termination of assistance for VASH participants. **No policy decisions are required.**

**Cessation of Case Management**

A VASH participant family’s assistance must be terminated for failure to participate, without good cause, in case management as verified by the VAMC or DSP. **No policy decisions are required.**

**Serious Violation of the Lease**

The regulation at 24 CFR 982.552(b)(2) states that the PHA must terminate program assistance for a family evicted from housing assisted under the program for serious violation of the lease. HUD waived this provision, and establishing the alternative requirement that the PHA may terminate program assistance in this case. **No policy decisions are required.**

**VAWA [FR Notice 8/13/24]**

This section discusses VAWA considerations when the perpetrator is the veteran. **No policy decisions are required.**

**19-III.H. PROJECT-BASING VASH VOUCHERS**

**General Requirements [Notice PIH 2017-21 and FR Notice 8/13/24]**

This section discusses general requirements for VASH PBVs. **No policy decisions are required.**

**Ineligible Units**

**No policy decisions are required.**

**Termination of Assistance**

🗹 **Decision Point: Will the PHA terminate a family’s PBV assistance for failure to participate in case management or allow the family to receive a tenant-based voucher?**

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

If the family fails to participate in case management when required by the VA, the PHA will terminate the family’s assistance. The family will have 120 days to vacate the unit. The PHA will terminate assistance to the family at the earlier of (1) the time the family vacates or (2) the expiration of the 120-day period. If the family fails to vacate the unit within the established time, the owner may evict the family. If the owner does not evict the family, the PHA will remove the unit from the HAP contract or amend the HAP contract to substitute a different unit in the project if the project is partially assisted. The PHA may add the removed unit back onto the HAP contract after the ineligible family vacates the property.

🞎 *Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Moves**

If a VASH family is eligible to move from its PBV unit after a year of PBV assistance, the PHA will generally follow policies in Chapter 17. However, if there is no VASH tenant-based voucher available at the time the family requests to move, the PHA’s actions depend on whether the family still requires case management. **No policy decisions are required.**

**Wrong-Sized or Accessible Units**

If the PHA determines that a VASH family is occupying a wrong-size PBV unit or a PBV unit with accessibility features that the family does not require and the PBV unit is needed by a family that requires the accessibility features, the PHA must notify the family and the owner within 30 days of the PHA’s determination. **No policy decisions are required.**

**Contract Terminations**

**No policy decisions are required.**

**Rents**

Contract rents may not be different based on whether the unit is a VASH PBV unit or a non-VASH PBV unit. **No policy decisions are required.**

**Removing Units from the HAP Contract for Ineligible Families**

The PHA and owner may also agree to temporarily remove a unit from the HAP contract in cases where a HUDVASH eligible veteran has been identified by the VA as appropriate for a VASH PBV unit, but the veteran is not income eligible to receive voucher assistance or may not be selected for the PBV unit because the family’s TTP exceeds the gross rent of the unit. **No policy decisions are required.**

**Zero HAP Families**

If the PBV project is either on the grounds of a VA facility or there are HUD-VASH supportive services provided onsite at the project, the PHA may opt to select a unit occupied by a zero HAP VASH eligible family or admit a zero HAP VASH family to a unit if such unit is made exclusively available to VASH families. **No policy decisions are required.**

**Proposal/Project Selection**

**No policy decisions are required.**

**Failure to Participate in Case Management [FR Notice 8/13/24]**

🗹 **Decision Point: What is the time limit for the initial term of a VASH voucher?**

Things to Consider

* Upon notification by the VAMC or DSP of the family’s failure to participate, without good cause, in case management, the PHA must provide the family a reasonable time period to vacate the unit. The PHA must terminate assistance to the family at the earlier of either the time the family vacates the unit or the expiration of the reasonable time period given to vacate.
* Per FR Notice 8/13/24, this “reasonable time period” is established by the PHA.
* Under Option 1, the PHA will give families 60 days to move out of a VASH PBV unit for failure to participate in case management without good cause. While other PHA policies that require PBV residents to move allow for 30 days, VASH families may need more support and may have difficulty finding a unit.
* The language under Option 1 also allows the PHA to extend the 60-day period if it is necessary due to circumstances beyond the family’s control. Although examples of circumstances are given, the policy does not provide an exhaustive list.
* Option 2 is the same as Option 1, with a blank space to fill in the amount of time given to families before they must move out of a VASH PBV unit due to failure to comply with case management requirements without good cause.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

Upon notification by the VAMC or DSP that a VASH PBV family has failed to participate in case management without good cause, the PHA will provide written notice of termination of assistance to the family and the owner within 10 business days. The family will be given 60 days from the date of the notice to move out of the unit.

The PHA may make exceptions to this 60-day period if needed for reasons beyond the family’s control such as death, serious illness, or other medical emergency of a family member.

🞎 *Option 2: Delete model plan language. Fill in the blanks and substitute language shown below.*

Upon notification by the VAMC or DSP that a VASH PBV family has failed to participate in case management without good cause, the PHA will provide written notice of termination of assistance to the family and the owner within \_\_\_ business days. The family will be given \_\_\_ days from the date of the notice to move out of the unit.

The PHA may make exceptions to this \_\_-day period if needed for reasons beyond the family’s control such as death, serious illness, or other medical emergency of a family member.

🞎 *Option 3: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Moves [HUD-VASH Qs and As, FR Notice 8/13/24]**

This section discusses special requirements for moves for VASH PBVs. **No policy decisions are required.**

**PART IV: MAINSTREAM VOUCHER PROGRAM**

**19-IV.A. PROGRAM OVERVIEW [Notice PIH 2020-01 and Notice PIH 2024-30]**

This section provides an overview of the program. **No policy decisions are required.**

**19-IV.B. ELIGIBLE POPULATION [Notice PIH 2020-01 and Notice PIH 2020-22]**

**This section discusses the eligible population for Mainstream vouchers. No policy decisions are required.**

**19-IV.C. PARTNERSHIP AND SUPPORTIVE SERVICES [Notice PIH 2020-01]**

PHAs are encouraged but not required to establish formal and informal partnerships with a variety of organizations that assist persons with disabilities.

**☑ Decision Point: Does the PHA administer the Mainstream program in partnership with any supportive service organizations?**

Things to Consider

* HUD encourages the PHA to establish formal and informal partnerships with a variety of organizations that assist persons with disabilities. Partner agencies may include Continuums of Care (CoCs), Centers for Independent Living, service provided for specific populations, homeless providers, and other community partners.
* The PHA should identify key primary and secondary points of contact to ensure ongoing communication.
* HUD encourages PHAs to continue developing partnerships with such organizations to help ensure eligible participants find and maintain stable housing.
* These partners may provide the following services:
  + Coordinate outreach and referral of eligible persons that meet the PHA’s preference criteria;
  + Assist persons with disabilities to apply to and obtain acceptance in housing programs, find housing, or secure home modifications and/or disability-related accommodations;
  + Assist persons with disabilities to move into units, including physically accessible units where appropriate, on the private rental market;
  + Refer, coordinate, or provide voluntary home and community-based services; and
  + Provide outreach to recruit landlords to participate in the HCV program (either for the program as a whole or specifically for the Mainstream voucher program).
* If the PHA has not partnered with any other groups, select Option 2.

**CAUTION:** **You must insert information here. The model plan does not contain language that can be adopted as-is.**

🞎 *Option 1:* *Use the model plan language shown below. Insert the list of partners as indicated.*

The PHA will implement a Mainstream program, in partnership with ***[insert names of any groups with which the PHA has formed partnerships].***

🞎 *Option 2: Delete the model plan language and insert the text below.*

The PHA has not partnered with any other groups in the operation of its Mainstream program.

🞎 *Option 3: Use another PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-IV.D. WAITING LIST ADMINISTRATION [Notice PIH 2024-30]**

**☑ Decision Point: Will the PHA establish a separate Mainstream waiting list?**

Things to Consider

* HCV regulations require PHAs to use a single waiting list for admission to HCV program. Prior to Notice PIH 2024-30, PHAs were required to select Mainstream voucher applicants from its HCV waiting list. This requirement led to challenges for some PHAs in administering Mainstream vouchers, as it can be time-consuming and burdensome to identify eligible applicants from long HCV waiting lists. Further, PHAs found it challenging to identify eligible applicants if the PHA has an established preference for targeted subgroups identified in a Mainstream notice of funding opportunity (NOFO), such as persons transitioning out of institutional or other segregated settings.
* Option1 of the model policy states the PHA will establish a separate Mainstream waiting list.
* The model policy does not include information on establishing a Mainstream waiting list as this will only occur once. If the PHA adopts Option 1, in accordance with Notice PIH 2024-30, the PHA must take the following actions:
  + If the PHA chooses to create a separate Mainstream waiting list, the PHA must notify families on the HCV waiting list of the separate Mainstream waiting list and provide an opportunity for families on the HCV list to be placed on the Mainstream list. The PHA must either post the information to their website or provide public notice in their communities. In providing this notice, the PHA must ensure effective communication to persons with disabilities, including persons with vision, hearing, speech, intellectual or developmental disabilities, or any other communication-related disabilities. The PHA must ensure effective communication by taking a combination of actions, which may include:
    - Individually notifying families that identified as having a family member with a disability at the time of application or pre-application;
    - Individually notifying a reasonable percentage of families from the top of the existing HCV waiting list given the anticipated number of Mainstream vouchers that a PHA will be issuing in the next five years, while not denying the opportunity for any other household on the HCV waiting list to also be placed on the Mainstream voucher waiting list;
    - Ensuring outreach to organizations serving persons with disabilities and service organizations so there is widespread awareness of the availability of a separate waiting list and how to access this resource;
    - Providing information on social media sites; and
    - Other communication methods.
  + When notifying families and providing notice, the PHA must describe the eligibility criteria for Mainstream vouchers and describe the actions a family should take to be added to the Mainstream voucher waiting list. The PHA notice should also make clear to applicants that if they decide to be included on the Mainstream waiting list, they will not lose their position on the HCV waiting list. The PHA must also take reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP).
  + When establishing a sperate Mainstream list, the PHA may choose and is strongly encouraged to commence notifying families on the HCV waiting list before the establishment of a separate Mainstream waiting list is formally adopted by the PHA board of commissioners or other authorized PHA officials.
    - The PHA notice must explain that the establishment of the Mainstream waiting list is dependent on the amendment to the PHA administrative plan being formally adopted but that families are strongly encouraged to take the necessary action now to ensure that their names are placed on the Mainstream waiting list as seamlessly and expeditiously as possible.
    - Conducting the outreach process to HCV waiting list applicants concurrently with the actions necessary to formally adopt the establishment of the separate Mainstream waiting list in the PHA administrative plan is an important consideration for PHAs that wish to implement the separate Mainstream waiting list promptly. Taking such action allows the PHA to ensure the HCV waiting list applicants are provided reasonable time to complete the actions necessary to be added to the Mainstream waiting list at its inception without having to unduly delay the implementation and the associated benefits and efficiencies offered by the Mainstream waiting list.
    - PHAs must allow 60 calendar days for the effective communication of notice and to provide families an opportunity to respond before issuing vouchers from the separate Mainstream waiting list. This 60-day period may commence whenever a PHA elects to do an early notification as described above. In the interim, PHAs can continue to use the HCV waitlist for issuing Mainstream vouchers.
  + For PHAs that rely on the date and time of application in determining the order in which families are selected from the Mainstream waiting list, HUD has waived 24 CFR 982.207(c)(1) and established as an alternative requirement that the application date and time of the family’s prior HCV application must be used for those Mainstream applicants that are already on the HCV waiting list. However, the order that families may be reached on the Mainstream waiting list compared to the regular HCV waiting list may be different depending on the local preferences the PHA establishes for the Mainstream waiting list. Selection from the Mainstream waiting list will be in accordance with local preferences that the PHA establishes for Mainstream voucher applicants. This may result in the selection of families from the Mainstream waiting list who were not previously on the HCV waiting list ahead of those who were on the HCV waiting list based on the family’s eligibility for a Mainstream applicant preference.

🞎 *Option 1:* *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will establish a separate waiting list for the Mainstream program.

All PHA policies on opening, closing, and updating the waiting list in Chapter 4 will also apply to the Mainstream waiting list.

🞎 *Option 2: Delete the model plan language and insert the text below.*

The PHA will not operate a separate Mainstream waiting list. When vouchers are available, the PHA will pull the first Mainstream-eligible family from its tenant-based waiting list. The PHA will not skip over Mainstream-eligible families on the waiting list because the PHA is serving the required number of Mainstream families.

All PHA policies on opening, closing, and updating the waiting list in Chapter 4 apply to the Mainstream program.

🞎 *Option 3: Use another PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-IV.E. PREFERENCES [Notice PIH 2024-30]**

HUD waived 24 CFR 982.207(a)(1) and allows PHAs to establish separate preferences for Mainstream voucher applicants. HUD also requires that preferences be adopted in certain circumstances.

**☑ Decision Point: Is the PHA required to adopt a preference and, if so, will the PHA adopt a preference for at least one targeted group?**

Things to Consider

* If the PHA claimed points for a preference in a Notice of Funding Opportunity (NOFO) application, the PHA must adopt a preference for at least one of the targeted groups in the NOFO.
* While PHAs are not required to adopt admission preferences related to Mainstream vouchers, the FY 2017 and 2019 Mainstream NOFOs awarded additional points to PHAs that agreed to adopt a preference for at least one of the following targeted groups.
* Under both the 2017 and 2019 NOFOs, the PHA could select one or more of the following preference categories:
  + Transitioning out of institutional/segregated settings
  + At serious risk of institutionalization
  + Currently experiencing homelessness
  + At risk of experiencing homelessness
* Under the 2019 NOFO, the PHA could also select:
  + Previously experienced homelessness
  + Currently a client in a permanent supportive housing (PSH) or rapid rehousing (RRH) project as eligible preference categories
* Preferences cannot be applied only to Mainstream vouchers.
* The PHA must ensure that their preference does not exclude persons with certain disabilities from accessing assistance or violate other fair housing or civil rights laws.
* Preferences may be limited to a certain number of applicants.
* PHAs that wish to target their assistance to one of the NOFO targeted groups may adopt a preference for just that group.
  + For example, PHA may adopt a preference only for those transitioning out of institutional or other segregated settings.
* The PHA may not have a preference specifically for referrals from organizations that exclusively serve persons with certain types of disabilities.
* Notice PIH 2013-15 provides that PHAs may adopt a preference specifically for the Coordinated Entry system, as it is not disability-specific.
* If the PHA adopts any of these preferences, the PHA would need to offer those on its current waiting list who meet the preference an opportunity to claim the preference.
* **NOTE:** If the PHA is identifying a preference here, you must also describe the preference in Section 4-III.C. of this chapter.
* Select Option 2 if the PHA will not adopt any preferences.

**CAUTION:** **You must insert information here. The model plan does not contain language that can be adopted as-is.**

🞎 *Option 1:* *Use the model plan language shown below. Insert the PHA’s preference as indicated.*

The PHA claimed a preference for a targeted group as part of an application for Mainstream vouchers under a NOFO. The PHA will offer the following preference:

**[Insert the PHA’s preference here and in Section 4-III.C.]**

🞎 *Option 2: Delete the model plan language and insert the text below.*

The PHA is not required to adopt any preferences.

🞎 *Option 3: Use another PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**☑ Decision Point: Will the PHA adopt any additional preferences?**

Things to Consider

* Because Mainstream vouchers are intended to facilitate access to housing for individuals with disabilities, including for individuals who reside in institutional or other segregated settings that may not be located in the geographic area that is typically served by a PHA, a residency preference may prevent an otherwise eligible applicant from accessing Mainstream vouchers. Consequently, HUD waived 24 CFR 982.207(b)(1) and established an alternative requirement under which a PHA cannot apply a residency preference to Mainstream voucher applicants.
* Option 1 assumes that the PHA has establishes a separate waiting list for Mainstream vouchers.
* PHAs may choose to establish a referral preference specifically for Mainstream voucher applicants. Option 2 outlines policies for this. Option 2 cannot be adopted as-is, as it requires that the PHA enter the names of partners. When selecting referral partners, the PHA must consider the following requirements outlined in Notice PIH 2024-30:
  + Referral partners may refer potential Mainstream voucher participants directly to the PHA for processing, and such individuals may be placed on the Mainstream waiting list.
  + A formalized partnership with a referring agency is not required for Mainstream voucher referrals, but HUD encourages PHAs to execute memoranda of understanding (MOUs) with agencies providing referrals. A sample MOU can be found in Notice PIH 2024-30.
  + PHAs that choose to use direct referrals from other agencies to place individuals onto their waiting list must make such information publicly available, by providing clear information on these partnerships and the direct referrals process on their website and in their administrative plan, including the names and contact information of their partnering agencies.
  + Written documentation of these referrals must be maintained in the tenant file by the PHA.
  + When engaging in such partnerships and accepting referrals, PHAs must ensure that they are not discriminating based on disability type or on the basis of any other federally protected class. Referral partnerships cannot create, directly or indirectly, requirements to receive Mainstream vouchers that may violate nondiscrimination requirements under any applicable federal civil rights laws, including Section 504 of the Rehabilitation Act (Section 504), the Fair Housing Act, Title VI of the Civil Rights Act (Title VI), the ADA, and the Age Discrimination Act, among others.
  + The PHA cannot restrict Mainstream vouchers to those referred by a specific state or local agency that provides services only to individuals with specific types of disabilities or diagnoses because such an arrangement would exclude individuals with other types of disabilities who are eligible to receive a Mainstream voucher. If a PHA partners with such an organization, the PHA also must have a partnership with at least one organization that will accept and refer any potentially eligible applicant.
  + Potential referral sources that may serve individuals with all types of disabilities and therefore will refer any potentially eligible applicant include Continuums of Care, Independent Living Centers, Area Agencies on Aging, and fair housing initiatives programs.
  + So long as the PHA has a referral partnership with a source that serves all individuals regardless of types of disability, the PHA may create additional partnerships with disability-specific referral services or other sources that may not serve individuals with all types of disabilities, such as state Medicaid agencies.
  + In implementing this referral process, a PHA cannot prioritize referrals from one referral source over others or provide any priority or preference over other referral sources in allocating vouchers and developing a waiting list.
  + Any proposed preferences must comply with federal fair housing and civil rights authorities, including, but not limited to, the Fair Housing Act, Section 504, Title VI, and the Age Discrimination Act, among others (24 CFR 5.105(a)).
  + These partnerships are intended to help PHAs more efficiently identify eligible beneficiaries and quickly utilize vouchers. Such partnerships also help facilitate access to individuals who are exiting institutional settings. Given the challenges in timing and ensuring a voucher is available when an individual is ready to leave an institutional setting, this type of arrangement allows an agency to better ensure a voucher will be available when an individual is ready to exit an institutional or other segregated setting, coordinate any application and screening issues, and build in time for finding a unit that meets the individual’s disability-related needs. This advance planning and coordination should help facilitate a timely move into a community-based, affordable, and integrated housing opportunity.

🞎 *Option 1:* *Use the model plan language shown below. No changes to the model plan are needed.*

Otherwise, the PHA will not offer any preferences on its Mainstream waiting list.

🞎 *Option 2: Delete the model plan language and use the text below, inserting the names of the PHA’s referral partners.*

The PHA will use direct referrals from other agencies to place individuals onto the waiting list. Information on direct referrals will be publicly available on the PHA’s website and will include information on the direct referrals process and the names and contact information of the PHA’s partnering agencies. The PHA will not prioritize referrals from one referral source over others or provide any priority or preference over other referral sources in allocating vouchers and developing a waiting list.

The PHA will use the following referral partners:

**[Insert the names of the PHA’s referral partners]**

Written documentation of referrals will be maintained in the tenant file by the PHA.

🞎 *Option 3: Use another PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-IV.F. VOUCHER ISSUANCE**

**Initial Search Term [Notice PIH 2024-30]**

For Mainstream vouchers, HUD waived 24 CFR 982.303(a), which requires an initial search term of at least 60 days, and established an alternative requirement that the initial search term for a Mainstream voucher be at least 120 days. The initial 120-day term also applies when a family chooses to move to a new unit with continued assistance inside or outside the PHA’s jurisdiction. When issuing a Mainstream voucher, the PHA also must provide a current listing of available accessible units known to the PHA and, if necessary, otherwise assist the family in identifying an accessible unit.

**☑ Decision Point: How long will the initial search term be for Mainstream vouchers?**

Things to Consider

* Many Mainstream voucher applicants face challenges in their housing search. Tight rental markets coupled with specific unit needs (e.g., accessible units, units near medical or supportive services, units near public transit, units meeting other disability-related needs, etc.) may require applicants to need additional time to search for a suitable unit.
* Option 1 states the PHA will initially issue vouchers for 120 days, which is the minimum amount of time required under Notice PIH 2024-30. If the PHA wishes to adopt a longer initial term, Option 1 should be edited and a period greater than 120 days should be entered.

🞎 *Option 1:* *Use the model plan language shown below. No changes to the model plan are needed.*

The initial voucher term for all Mainstream vouchers, including those issued when a family wishes to exercise portability, will be 120 days.

🞎 *Option 2: Use another PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Voucher Extension [Notice PIH 2024-30]**

**☑ Decision Point: What is the PHA’s policy on extensions for Mainstream vouchers?**

Things to Consider

* Families may require more than the minimum required initial extension to successfully lease up and must be granted additional extensions if requested in accordance with the PHA’s administration plan.
* While all Mainstream voucher applicants include a family member with a disability and are eligible for an extension as a reasonable accommodation, PHAs have considerable discretion in the details they may establish for their general extension policy under 24 CFR 982.303(b)(1) outside of the context of reasonable accommodation, including the deadline for requesting an extension and the length of the extension.
* National voucher success rates and median search times indicate that, on average, Mainstream voucher applicants take longer to lease than HCV applicants and are more likely to ultimately be unsuccessful in using their voucher compared to other special purpose voucher applicants.
* HUD stated that given the challenges Mainstream voucher applicants may face in securing a unit, applicants should be provided with flexible extension policies.
* Note that this alternative requirement also applies to current Mainstream voucher participants who choose to move to a new unit with continued assistance inside or outside the PHA’s jurisdiction.
* Option 1 states the PHA will extend vouchers for 90 days, which is the minimum amount of time required under Notice PIH 2024-30. If the PHA wishes to adopt a longer extension term, Option 1 should be edited and a period greater than 90 days should be entered. Notice PIH 2024-30 states that subsequent requests for extensions should be processed in accordance with the PHA’s administrative plan. For ease of administration and to ensure that Mainstream voucher holders receive as much search time as is necessary, Option 1 treats subsequent requests the same way as initial requests.

🞎 *Option 1:* *Use the model plan language shown below. Insert the list of partners as indicated.*

At least 30 days prior to the expiration of the initial term of the voucher, the PHA will contact the family to remind them of the expiration date of their voucher, the process for requesting an extension, and to inquire if the family needs assistance with their housing search. Depending on the family’s preferred method of communication, the PHA may contact the family via telephone, text message, email, or other accessible communication method. The PHA will ensure effective communication with persons with disabilities, including those with vision, hearing, speech, intellectual or other developmental disabilities, or any other communication-related disabilities.

Families may request an extension, either orally or in writing, at any time prior to the expiration of the family’s voucher. All requests for extensions will automatically be granted without the requirement for the family to provide documentation. The initial extension period will be for 90 days. If the family requires additional extensions beyond 90 days, the family may request additional extensions, either orally or in writing, at any time prior to the expiration of the extended voucher term. All subsequent extensions will also be for a period of 90 days and will not require the family to meet certain circumstances or provide documentation. Each time the family requests an extension, the PHA will inquire if the family needs assistance with their housing search and will provide a current listing of available accessible units known to the PHA.

🞎 *Option 2: Use another PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-IV.G. PORTABILITY [Notice PIH 2020-01 and Mainstream Voucher Basics Webinar, 10/15/20]**

This section discusses portability for Mainstream vouchers. **No policy decisions are required.**

**19-IV.H. PROJECT-BASING MAINSTREAM VOUCHERS [FY19 Mainstream Voucher NOFA Q&A]**

This section states Mainstream vouchers may be project-based. **No policy decisions are required.**

**PART V: NON-ELDERLY DISABLED (NED) VOUCHERS**

**19-V.A. PROGRAM OVERVIEW [Notice PIH 2013-19]**

This section provides an overview of NED vouchers. **No policy decisions are required.**

**19-V.B. ELIGIBLE POPULATION**

**General Requirements [Notice PIH 2013-19]**

This section provides an overview of eligibility requirements for all NED vouchers. **No policy decisions are required.**

**NED Category 2 [Notice PIH 2013-19 and NED Category 2 FAQs]**

This section provides an overview of special eligibility requirements for NED Category 2 vouchers. **No policy decisions are required.**

**19-V.C. WAITING LIST**

**General Requirements [Notice PIH 2013-19]**

This section provides an overview of waiting list requirements for all NED vouchers. **No policy decisions are required.**

**NED Category 2 Referrals [NED Category 2 FAQs]**

This section provides an overview of requirements for referrals for NED Category 2 vouchers. **No policy decisions are required.**

**Reissuance of Turnover Vouchers [Notice PIH 2013-19]**

This section provides an overview of requirements for reissuance of turnover vouchers. **No policy decisions are required.**

**19-V.D. LEASE UP [Notice PIH 2013-19]**

**Briefings**

In addition to providing families with a disabled person a list of accessible units known to the PHA, PHAs are encouraged to provide additional resources to NED families as part of the briefing.

🗹 **Decision Point: Will the PHA provide any additional items in the briefing packet for NED voucher holders?**

Things to Consider

* While the PHA is not required to add additional information to the briefing packet, in Notice PIH 2011-32, HUD states that in addition to providing families with a disabled person a list of accessible units known to the PHA, the PHA should provide a list of local supportive service and disability organizations that may provide such assistance as counseling services and funding for moving expenses or security deposits in the briefing packet.
* These organizations include state protection and advocacy agencies, Centers for Independent Living, State Medicaid agencies, and disability advocacy groups that represent individuals with a variety of disabilities.
* Since HUD has identified this as a best practice, Option 1 states the PHA will add these materials to the briefing packet. If the PHA will add other items to the packet as well, the PHA should amend the model language in Option 1.
* If the PHA will not provide any additional resources in the briefing packet for NED families, select Option 2.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

In addition to providing families with a disabled person a list of accessible units known to the PHA, the PHA will provide a list of local supportive service and disability organizations that may provide such assistance as counseling services and funding for moving expenses or security deposits in the briefing packet. These organizations include state protection and advocacy agencies, Centers for Independent Living, state Medicaid agencies, and disability advocacy groups that represent individuals with a variety of disabilities.

Further, if other governmental or non-governmental agencies provide available resources such as housing search counseling, moving expenses, security deposits, and utility deposits, the PHA will include this information in the briefing packet.

The PHA will also offer specialized housing search assistance to families with a disabled person to locate accessible units if requested. Trained PHA staff or a local supportive service or disability organization may be able to provide this service.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

The PHA will not provide any additional resources in the briefing packet for NED families.

**Voucher Term**

HUD encourages PHAs to be generous in establishing reasonable initial search terms and subsequent extensions for families with a disabled person.

🗹 **Decision Point: What is the time limit for the initial term of a NED voucher?**

Things to Consider

* The PHA is not required to establish different policies for the initial term of the voucher for NED vouchers.
* In Notice PIH 2011-32, HUD encouraged PHAs to consider more generous search terms for families with a disabled individual since it may be harder for these families to locate a suitable unit.
* While 60 days is the minimum voucher term, there is no maximum term established by program regulations.
* In setting its policy concerning the length of the voucher term, a PHA may wish to contact agencies that work with families with a disabled person for advice on reasonable search terms.
* While HUD encourages search terms that maximize the family’s opportunity to find suitable housing, the term may not be indefinite.
* Option 1 in the model policy assumes that the PHA has adopted the model policy in Section 5-II.E. for an initial term of 60 days. If the PHA has adopted this policy, Option 1 increases the search time for NED vouchers to 120 days. This time period was selected because it mirrors the search period for VASH vouchers.
* If the PHA has adopted an alternative policy in 5-II.E. and wishes to extend the initial voucher term for NED vouchers, the PHA may wish to alter the language in Option 1.
* If the PHA wants to issue vouchers for the same time period for NED vouchers as all other vouchers, the PHA should select Option 2.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

All NED vouchers will have an initial term of 120 calendar days.

The family must submit a Request for Tenancy Approval and proposed lease within the 120-day period unless the PHA grants an extension.

All other PHA policies on extensions and suspension of vouchers in Section 5-II.E. will apply.

🞎 *Option 2*: *Delete the model plan language and insert the language below.*

The PHA will not provide a longer search term for NED vouchers than for other vouchers. The PHA will follow all policies in section 5-II.E. regarding the initial and extension terms of the voucher.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Special Housing Types [Notice PIH 2013-19 and NED Category 2 FAQs]**

This section provides information on special housing types. **No policy decisions are required.**

**19-V.E. PORTABILITY [NED Category 2 FAQs]**

NED vouchers follow standard portability rules for the HCV program. However, the PHA may, but is not required to, allow NED families to move under portability, even if the family did not have legal residency in the initial PHA’s jurisdiction when they applied.

🗹 **Decision Point: Will the PHA allow nonresident applicant NED voucher holders to exercise portability upon initial lease-up?**

Things to Consider

* The HUD regulations on portability make a distinction between resident and nonresident applicant families. A nonresident family is one whose head, spouse, or cohead did not have a domicile (legal residence) in the initial PHA’s jurisdiction when the family first submitted an application for admission to the initial PHA’s voucher program [24 CFR 982.353(c)(1)]. Unlike resident families, nonresident families have no right to portability for the first 12 months after they are admitted to the program; however, the initial PHA has the discretion to allow portability during this period [24 CFR 982.353(c)(2)].
* In some cases, the supportive services a person needs in order to live in the community might only be available in an area outside the PHA’s jurisdiction.
* Even if the PHA has a policy of not allowing portability for nonresident applicants within the first year, the PHA must consider granting an exception to the policy if doing so provides a reasonable accommodation for a person with disabilities.
* Another option the PHA has is to revise the policy in its PHA administrative plan on portability for nonresident applicants to allow for immediate portability. The PHA can specify that this exception to their general policy applies only to NED Category 2 families.
* For consistency with policies in Section 10-II.B., which state the PHA will typically not allow portability in this situation with exceptions for purposes of reasonable accommodation and VAWA, Option 1 does not allow portability for nonresident families during the first 12 months.
* If the PHA adopts Option 2, the PHA should also amend the policy in Section 10-II.B. to reflect this change.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

If neither the head of household nor the spouse or cohead of a NED applicant family had a domicile (legal residence) in the PHA’s jurisdiction at the time that the family’s initial application for assistance was submitted, the family must lease a unit within the initial PHA’s jurisdiction for at least 12 months before requesting portability.

The PHA will consider exceptions to this policy for purposes of reasonable accommodation (see Chapter 2) or reasons related to domestic violence, dating violence, sexual assault, stalking, or human trafficking.

🞎 *Option 2*: *Delete the model plan language and insert the language below.*

If neither the head of household nor the spouse or cohead of a NED applicant family had a domicile (legal residence) in the PHA’s jurisdiction at the time the family’s application for assistance was submitted, the NED family will be allowed to move to an area outside the PHA’s jurisdiction under portability [24 CFR 982.353(c)].

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**PART VI: STABILITY VOUCHER PROGRAM**

**19-VI.A. PROGRAM OVERVIEW [Notice PIH 2022-24]**

This section is an overview of the SV program. **No policy decisions are required.**

**19-VI.B. PARTNERING ORGANIZATION [Notice PIH 2022-24]**

SV funding is only awarded to PHAs that partner with eligible Continuums of Care (CoCs) or other entities that serve the targeted population, such as Victim Service Providers (VSPs) and Veteran Service Organizations (VSOs) serving the targeted population in the PHA’s jurisdiction.

**☑ Decision Point: Which organization will the PHA partner with to administer the program?**

### Things to Consider

* PHAs that agree to accept an allocation of SVs must enter into an MOU with a partnering CoC within 90 days of the effective date of the ACC funding increment for the SVs.
* The PHA must provide the MOU to HUD if requested to do so.
* The MOU may be subsequently amended to add or change the services that the CoC may provide but must always retain the direct referral responsibility of the CoC.
* For ease of administration, PHAs with an Emergency Housing Voucher (EHV) allocation may add an SV addendum to their established EHV MOU. The EHV website includes many resources containing guidance on best practices for working in collaboration with CoC.
* All services provided by the CoC must be outlined in the MOU.
* The MOU must include at a minimum include:
  + The PHA’s, CoC’s, and VSP’s commitment to administering the SVs in partnership.
  + The goals and standards of success in administering the SVs.
  + The staff position for each organization that will serve as the lead SV liaison.
  + A listing of CoC-funded supportive services that will be paired with SVs.
  + All alternative waivers adopted by the PHA for the administration of SVs.
  + Any permissive prohibition policies agreed upon by the PHA and CoC.
  + The roles and responsibilities of the PHA and CoC, including but not limited to the CoC making direct referrals of eligible families to the PHA through the coordinated entry (CE) process (CoCs may be required to update CE policies as required under 24 CFR 578.7(a)(c)).
  + A statement that all parties agree to cooperate with any program evaluation efforts undertaken by HUD, or a HUD-approved contractor, including compliance with HUD evaluation protocols and data sharing requests.
* Option 1 states that a copy of the MOU will be attached at the end of this chapter as Exhibit 19-3. Exhibit 19-3 contains sample MOU language from Notice PIH 2022-24 that the PHA may fill in, or the PHA may replace this sample text with its own MOU. If the PHA does not wish to attach the MOU to the chapter, this should be removed.

**CAUTION:** **You must insert information here. The model plan does not contain language that can be adopted as-is.**

🞎 *Option 1*: *Use the model plan language shown below, inserting the names of partnering organizations.*

The PHA has entered into an MOU with the following partnering organization ***[insert names of CoC, VSP, and/or VSO].*** See Exhibit 19-3 for a copy of the MOU.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-VI.C. REFERRALS [Notice PIH 2022-24]**

**CoC Referrals**

The primary responsibility of the CoC under the MOU is to make direct referrals of qualifying individuals and families to the PHA and to identify any CoC-funded available supportive services that may be paired with SVs.

**☑ Decision Point: How will referrals between the CoC or partnering agency and the PHA be made?**

### Things to Consider

* Notice PIH 2022-24 does not outline how the referral process between the CoC or partnering agency and the PHA should operate. As such, the language in Option 1 is drawn from best practice language used for the VASH program in this chapter.
* The PHA should work closely with the CoC and other partnering agencies to establish a referral process that expedites the issuance of SVs and to establish a system that works for all parties.
* For certifying eligibility for individuals and families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, CoCs and victim service providers may accept the survivors’ self-definition of *fleeing or attempting to flee* for purposes of meeting eligibility for the SV as a person fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking. Therefore, if an individual self-identifies as fleeing or attempting to flee domestic violence, that individual would be eligible for an SV. Additionally, the survivor of domestic violence, dating violence, sexual assault, stalking, or human trafficking can be a minor child.

🞎 *Option 1*: *Use the model plan language shown below, no changes to the model plan are needed.*

The CoC or partnering agency must establish and implement a system to identify SV-eligible individuals and families within the agency’s caseload and make referrals to the PHA.

The CoC or other partnering agency must certify that the SV applicants they refer to the PHA meet SV eligibility criteria. The PHA will maintain a copy of the referral or certification from the CoC or other partnering agency in the participant’s file along with other eligibility paperwork. Homeless service providers may, but are not required to, use the certification form found in Exhibit 19-1 of this chapter. Victim services providers may, but are not required to, use the certification form found in Exhibit 19-1 of this chapter when identifying eligible families who qualify as victims of human trafficking.

As part of the MOU, the PHA and CoC or other partnering agency will identify staff positions to serve as lead SV liaisons. These positions will be responsible for transmission and acceptance of referrals. The CoC or partnering agency must commit sufficient staff and resources to ensure eligible individuals and families are identified and determined eligible in a timely manner.

The PHA liaison responsible for acceptance of referrals will contact the CoC or partnering agency liaison via email indicating the number of vouchers available and requesting an appropriate number of referrals. No more than five business days from the date the CoC or partnering agency receives this notification, the CoC or partnering agency liaison will provide the PHA with a list of eligible referrals including the name, address, and contact phone number for each adult individual who is being referred; a completed release form for each adult family member; and a written certification for each referral indicating they are SV-eligible.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Referrals from Outside the CoC**

This section is an overview of when families may be issued SVs without a referral from the CoC. **No policy decisions are required.**

**19-VI.D. WAITING LIST [Notice PIH 2022-24]**

**HCV Waiting List**

HUD has waived the requirement that admissions come from the PHA’s HCV waiting list or be a special admission for the SV program. PHAs must inform families on the HCV waiting list of the availability of SVs by, at a minimum, either by posting the information to their website or providing public notice in their respective communities in accordance with the requirements listed in Notice PIH 2022-24.

**☑ Decision Point: How will the PHA notify families on the HCV waiting list of the availability of SVs?**

### Things to Consider

* In order to expedite the process, Option 1 states that the PHA will post information on their website only. If the PHA wishes to also provide public notice, the PHA should select Option 2.
* The PHA notice must describe the eligible populations to which the SVs are limited and clearly state that the availability of these SVs is managed through a direct referral process.
* The PHA notice must advise the family to contact the CoC (or any other PHA referral partner, if applicable) if the family believes they may be eligible for SV assistance.
* PHAs must ensure effective communication with persons with disabilities, including those with vision, hearing, and other communication-related disabilities. PHAs must also take reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP).
* Notice PIH 2022-24 states that posting either on the PHA website or through public notice are minimum requirements. If the PHA wishes to inform HCV waiting list families using other means, the model policy should be edited to reflect this.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will post information about the SV program for families on the PHA’s HCV waiting list on their website. The notice will:

Describe the eligible populations to which SVs are limited.

Clearly state that the availability of these SVs is managed through a direct referral process.

Advise the family to contact the CoC (or any other PHA referral partner, if applicable) if the family believes they may be eligible for SV assistance.

The PHA will ensure effective communication with persons with disabilities, including those with vision, hearing, and other communication-related disabilities in accordance with Chapter 2. The PHA will also take reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP) in accordance with Chapter 2.

🞎 *Option 2*: *Delete the model plan language and insert the language below.*

The PHA will inform families on the HCV waiting list of the availability of SVs by posting information to their website and providing public notice.

The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:

***[List here newspapers/other media where notices will be published]***

The notice will:

Describe the eligible populations to which SVs are limited.

Clearly state that the availability of these SVs is managed through a direct referral process.

Advise the family to contact the CoC (or any other PHA referral partner, if applicable) if the family believes they may be eligible for SV assistance.

The PHA will ensure effective communication with persons with disabilities, including those with vision, hearing, and other communication-related disabilities in accordance with Chapter 2. The PHA will also take reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP) in accordance with Chapter 2.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**SV Waiting List**

When the number of applicants referred by the CoC or partnering agency exceeds the SVs available, the PHA must maintain a separate waiting list for SV referrals. **No policy decisions are required.**

**HCV Waiting List Preferences**

If the PHA has a homeless preference or a VAWA preference for the HCV waiting list, the PHA must adopt additional policies related to SVs in accordance with Notice PIH 2022-24.

**☑ Decision Point: Does the PHA have a VAWA or homeless preference for its HCV waiting list?**

### Things to Consider

* If the PHA has a preference for victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking for the regular HCV program, the PHA must refer any applicant on the waiting list that indicated they qualified for this preference to the CoC or the applicable partnering referral agency. The CoC or partnering referral agency will determine if the family is eligible (based on the qualifying definition for SV assistance for those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or another eligible category as applicable) for an SV.
* If the PHA has a homeless preference for the regular HCV program, the PHA must refer any applicant on the waiting list that indicated they qualified for the homeless preference to the CoC. The CoC will determine whether the family is eligible for an SV (based on the qualifying definition for SV assistance for homelessness or another eligible category as applicable). The CoC will also determine if the family is eligible for other homeless assistance.
* If the PHA does not have either preference, select Option 1.
* If the PHA has a VAWA preference but not a homeless preference, select Option 2.
* If the PHA has a homeless preference but not a VAWA preference, select Option 3.
* If the PHA has both a VAWA preference and a homeless preference, select Option 4.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

The PHA does not offer either a homelessness or a VAWA preference for the HCV waiting list.

🞎 *Option 2*: *Delete the model plan language and insert the language below.*

The PHA has a preference for victims of domestic violence, dating violence, sexual assault, or stalking for the HCV waiting list as outlined in 4-III.C. Local Preferences.

The PHA will refer any applicant on the waiting list who indicates they qualify for this preference to the CoC or the applicable partnering referral agency. The CoC or partnering referral agency will determine if the family is eligible (based on the qualifying definition for SV assistance for those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or another eligible category as applicable) for an SV.

🞎 *Option 3*: *Delete the model plan language and insert the language below.*

The PHA has a homeless preference for the HCV waiting list as outlined in Section 4-III.C. Local Preferences.

The PHA will refer any applicant on the waiting list that indicates they qualify for the homeless preference to the CoC. The CoC will determine whether the family is eligible for an SV (based on the qualifying definition for SV assistance for homelessness or another eligible category as applicable). The CoC will also determine if the family is eligible for other homeless assistance.

🞎 *Option 4*: *Delete the model plan language and insert the language below.*

The PHA has a preference for victims of domestic violence, dating violence, sexual assault, or stalking and a homeless preference for the HCV waiting list as outlined in Section 4-III.C. Local Preferences.

The PHA will refer any applicant on the waiting list who indicates they qualify for the PHA’s VAWA preference to the CoC or the applicable partnering referral agency. The CoC or partnering referral agency will determine if the family is eligible (based on the qualifying definition for SV assistance for those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or another eligible category as applicable) for an SV.

The PHA will refer any applicant on the waiting list that indicates they qualify for the homeless preference to the CoC. The CoC will determine whether the family is eligible for an SV (based on the qualifying definition for SV assistance for homelessness or another eligible category as applicable). The CoC will also determine if the family is eligible for other homeless assistance.

🞎 *Option 5*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**SV Waiting List Preferences**

With the exception of a residency preference, the PHA may choose, in coordination with the CoC and other referral partners, to establish separate local preferences for SVs. The PHA may, however, choose to not establish any local preferences for the SV waiting list.

**☑ Decision Point: Will the PHA establish a local preference for the SV waiting list?**

### Things to Consider

* The PHA may have an existing set of local preferences for its HCV program that understandably does not align with the specific targeted purpose of the SVs.
* Furthermore, the PHA, in conjunction with the CoC and other referral partners, may wish to establish preferences specifically designed for SV admissions that the PHA would not want to apply to its regular HCV waiting list. Excluding SVs from the PHA’s normally applicable local preference system will simplify SV administration and ensure that SVs are not being prioritized based on preferences designed for the broad universe of HCV-eligible applicants rather than the subset of SV-qualifying families.
* The PHA may choose, in coordination with the CoC and other referral partners, to establish separate local preferences for SVs, or may simply choose to not establish any local preferences for the SV waiting list.
* In establishing any local preferences for the SV waiting list, the preference may not prohibit SV admissions from any of the four qualifying categories of eligibility. The preference system prioritizes the order in which families on the SV waiting list are assisted but does not allow the PHA to refuse to accept a referred family that meets one of the four SV eligibility categories, or otherwise delay issuance of an available voucher to that eligible family in order to “hold” the voucher for a future referral of a preference holder.
* The PHA must ensure any local preferences do not discriminate on the basis of any federally protected classes and cannot use criteria or methods of administration that would result in discrimination.
* The HCV program regulations at 24 CFR 982.207(b) allow a PHA to adopt and implement a residency preference in accordance with the nondiscrimination and equal opportunity requirements listed at 24 CFR 5.105(a). Given the emergency nature of these vouchers, the fact that many individuals and families in the targeted populations may not necessarily qualify as a “resident” due to their housing circumstances, and because of the direct referral and coordinated entry aspect of SV administration, it is not appropriate to apply residency preferences for SV admission. Consequently, HUD is waiving 24 CFR 982.207(b) and establishing an alternative requirement under which a PHA may not apply any residency preference to SV applicants.
* For ease of administration, Option 1 states the PHA will not offer preferences for the SV waiting list.
* If the PHA wishes to establish preferences for the SV waiting list, Option 2 should be selected and the parameters and verification requirements for those preferences should be described.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

No local preferences have been established for the SV waiting list.

🞎 *Option 2*: *Delete the model plan language and insert the language below.*

The PHA will use the following local preferences for the SV waiting list:

**[*Insert list of preferences*]**

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-VI.E. FAMILY ELIGIBILITY [Notice PIH 2022-24]**

**Referring Agency Determination of Eligibility**

This section describes the criteria for eligibility for the SV program. **No policy decisions are required.**

**Mandatory** **Denials**

The PHA must deny admission to the program if any member of the family fails to sign and submit consent forms for obtaining information as required by 24 CFR 982.552(b)(3) but should notify the family of the limited SV grounds for denial of admission first.

**☑ Decision Point: When will the PHA notify the family of the limited SV grounds for denial of admission?**

Things to Consider

* For ease of administration, Option 1 states that the PHA will notify the family of the limited SV grounds for denial.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

While the PHA will deny admission to the program if any adult member (or head of household or spouse, regardless of age) fails to sign and submit consent forms, the PHA will first notify the family of the limited SV grounds for denial of admission as part of the notice of denial that will be mailed to the family.

🞎 *Option 2*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Permissive** **Denial**

The PHA may prohibit admission of a family for the grounds listed in Notice PIH 2022-24. The PHA policy on SV permissive prohibitions must be described in the PHA’s administrative plan.

**☑ Decision Point: Will the PHA adopt any permissive denials for the SV program?**

Things to Consider

* The PHA may choose not to prohibit admission for the grounds listed in Notice PIH 2022-24 or may establish a more permissive policy than the PHA’s policy for admission to the regular HCV program.
* Permissive prohibitions only apply at the time of application for an SV. When adding a family member after the family has been placed under a HAP contract with SV assistance, the regulations at 24 CFR 982.551(h)(2) apply. Other than the birth, adoption, or court-awarded custody of a child, the PHA must approve additional family members and may apply its regular screening criteria in doing so.
* If the PHA chooses not to adopt permissive prohibitions, Option 2 should be selected.
* If the PHA chooses to adopt permissive prohibitions:
  + The PHA may not establish a permissive prohibition policy for SV applicants that is more prohibitive than the policy established for admissions to the regular HCV program.
  + The PHA must consult with its CoC partner to understand the impact that the proposed prohibitions may have on referrals and must take the CoC’s recommendations into consideration. As such, before adopting the language listed in the model policy, the PHA must first consult with the CoC.
  + Determinations must be made based on an individualized assessment of relevant mitigating information in accordance with the Office of General Counsel Guidance on Application of Fair Housing Standards and Use of Criminal Records by Providers of Housing and Real Estate-Transactions (April 6, 2016).
  + Similar to the HUD–Veterans Affairs Supportive Housing (HUD–VASH) program, HUD has eliminated the PHA’s permissive prohibitions for SV admissions for drug-related criminal activity. The eligible populations of homeless and at-risk of homelessness individuals and families may include individuals struggling with drug addiction, and that addiction may be one of the root causes of their homelessness. As demonstrated by the “Housing First” model, providing the individual with safe housing may be a critical first step in helping the individual recover from addiction. Consequently, prohibitions based on criminal activity for the eligible SV populations regarding drug possession should be considered apart from criminal activity against persons (i.e., violent criminal activity).
  + Further, HUD remains concerned about the potential discriminatory effect that reliance on drug-related criminal activity history as grounds for denial of admission may pose for the SV program.
  + Notice PIH 2022-24 lists allowable permissive prohibitions. Option 1 of the model policy adopts these. Permissive prohibitions for SV are:
    - If the PHA determines that any household member is currently engaged in, or has engaged in within the previous 12 months:
      * Violent criminal activity
      * Other criminal activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity
    - If any member of the family has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program within the previous 12 months.
    - If the family engaged in or threatened abusive or violent behavior toward PHA personnel within the previous 12 months.
  + Notice PIH 2022-24 also list reasons that, unlike regular HCV admissions, the PHAs may not deny an SV applicant admission. Option 1 includes language clarifying that denial for these criteria is prohibited. Prohibited denial criteria include:
    - Any member of the family has been evicted from federally assisted housing in the last five years (Note: Notice PIH 2022-24 contains a typo and does not include “in the last five years.” NMA has added this for clarity in order to complete the text.)
    - A PHA has ever terminated assistance under the program for any member of the family.
    - The family currently owes rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.
    - The family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease.
    - The family breached an agreement with the PHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA.
    - The family would otherwise be prohibited admission under alcohol abuse standards established by the PHA in accordance with 24 CFR 982.553(a)(3).
    - The PHA determines that any household member is currently engaged in or has engaged in during a reasonable time before the admission, drug-related criminal activity.
* Prior to admission, PHAs must continue to use HUD’s EIV system to search for all household members using the Existing Tenant Search. The PHA may be required to deny assistance to household members already receiving assistance from another program. Option 1 states that the PHA will deny for this reason.

🞎 *Option 1*: *Use the model plan language shown below. No changes to the model plan are needed.*

In consultation with the CoC, the PHA will apply permissive prohibition to the screening of SV applicants. Determinations using permissive prohibitions will be made based on an individualized assessment of relevant mitigating information in accordance with policies in Section 3-III.E of the administrative plan.

The PHA will establish the following permissive prohibitions:

If the PHA determines that any household member is currently engaged in, or has engaged in within the previous 12 months:

Violent criminal activity

Other criminal activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity

If any member of the family has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program within the previous 12 months.

If the family engaged in or threatened abusive or violent behavior toward PHA personnel within the previous 12 months.

Prohibitions based on criminal activity for the eligible SV populations regarding drug possession will be considered apart from criminal activity against persons (i.e., violent criminal activity).

In compliance with PIH 2022-24, the PHA **will not** deny an SV applicant admission regardless of whether:

Any member of the family has been evicted from federally assisted housing in the last five years

A PHA has ever terminated assistance under the program for any member of the family

The family currently owes rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act

The family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease

The family breached an agreement with the PHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA

The family would otherwise be prohibited admission under alcohol abuse standards established by the PHA in accordance with 24 CFR 982.553(a)(3)

The PHA determines that any household member is currently engaged in or has engaged in during a reasonable time before the admission, drug-related criminal activity

🞎 *Option 2*: *Delete the model plan language and insert the language below.*

The PHA will not adopt any permissive prohibitions for the SV program.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Self-Certification of Income at Admission**

The requirement to obtain third-party verification of income in accordance with Notice PIH 2018-18 does not apply to the SV program applicants at admission and, alternatively, PHAs may consider self-certification the highest form of income verification at admission.

**☑ Decision Point: What are the PHA’s requirements for acceptable documents?**

Things to Consider

* HUD has waived the third-party income verification requirements for SV applicants, and alternatively, is allowing PHAs to consider self-certification as the highest form of income verification at admission.
* For homeless families and other SV-eligible families, documentation may not be readily on-hand and may be difficult to obtain quickly. Accepting self-certifications and allowing for the delay of receipt of documentation and/or third-party verification will allow the CoC and partnering agency to assist the family in obtaining the necessary documentation without unduly delaying the family’s housing assistance.
* Applicants must submit an affidavit attesting to reported income, assets, expenses, and other factors that would affect an income eligibility determination.
* The program regulations under 24 CFR 982.201(e) require that the PHA receive information verifying that an applicant is eligible within the 60-day period before the PHA issues a voucher. Notice PIH 2018-18 states that third-party generated documents be dated within 60 days of the PHA’s request. For SV, Notice PIH 2022-24 states that applicants may provide third-party documentation that represents the applicant’s income within the 60-day period prior to admission or voucher issuance but is not dated within 60 days of the PHA’s request.
  + For example, a Supplemental Security Income (SSI) benefit letter that was issued in November 2020 to represent the applicant’s benefit amount for 2021 and was provided to the PHA in September 2021 would be an acceptable form of income verification.
* The model policy adopts the language from Notice 2022-24 but adds additional clarification on requirements for documents provided by the family in accordance with Notice PIH 2018-18 and PHA policies in Chapter 7.
* The condition of the document is vital to its integrity and usefulness. There should be no sign of tampering with the information. Documents are unacceptable if they have been damaged to the extent or written in a manner that the information is not useable. The format of the document is less important. Unless there is reason to believe the document is not authentic or that the information has been altered, printouts from webpages should be acceptable.
* HUD encourages PHAs to incorporate additional procedures to remind families of the obligation to provide true and complete information. PHAs that conduct eligibility determinations under this waiver/alternative requirement will be responsible for addressing any material discrepancies (i.e., unreported income or a substantial difference in reported income) that may arise later and must take necessary enforcement actions if the tenant was never eligible due to their income, as well as initiate HUD-compliant payment plans for those whose unreported income was unintentional and do not make the tenant ineligible for the program accordingly.
* Waivers listed in Notice PIH 2022-24 do not authorize any ineligible family to receive assistance under these programs. If a PHA later determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

Any documents used for verification must be the original (not photocopies) and dated within the 60-day period prior to admission. The documents must not be damaged, altered, or in any way illegible.

Printouts from webpages are considered original documents.

Any family self-certifications must be made in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified.

The PHA will incorporate additional procedures to remind families of the obligation to provide true and complete information in accordance with Chapter 14. The PHA will address any material discrepancies (i.e., unreported income or a substantial difference in reported income) that may arise later. The PHA may, but is not required to, offer the family a repayment agreement in accordance with Chapter 16. If the family fails to repay the excess subsidy, the PHA will terminate the family’s assistance in accordance with the policies in Chapter 12.

🞎 *Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Recently Conducted Income Determinations**

PHAs may accept income calculations and verifications from third-party providers or from an examination that the PHA conducted on behalf of the family for another subsidized housing program provided they meet criteria outlined in Notice PIH 2022-24.

**☑ Decision Point: Will the PHA accept income calculations and verifications from third-party providers?**

Things to Consider

* Some families who were recently homeless but are now currently residing in rapid rehousing or are receiving other time-limited housing assistance may have had their income recently verified under that housing assistance program.
* Furthermore, families who are eligible for SV assistance as victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking may be currently assisted through other subsidized housing programs such as public housing.
* PHAs may accept income calculations and verifications from third-party providers or from an examination that the PHA conducted on behalf of the family for another subsidized housing program in lieu of conducting an initial examination of income as long as:
  + The income was calculated in accordance with rules outlined at 24 CFR Part 5 and within the last six months; and
  + The family certifies there has been no change in income or family composition in the interim.
* In order to expedite the eligibility process as much as possible, Option 1 states the PHA will accept income calculations and verifications from third-party providers provided they meet the criteria listed in Notice PIH 2022-24.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will accept income calculations and verifications from third-party providers provided they meet the criteria outlined above.

The family certification must be made in a format acceptable to the PHA and must be signed by all adult family members whose information or status is being verified.

🞎 *Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**EIV Income Validation**

This section describes requirements for the use of EIV for SV families. **No policy decisions are required.**

**Social Security Number and Citizenship Status Verification**

Notice PIH 2022-15 allows PHAs to admit applicants prior to the verification of Social Security numbers and citizenship or eligible immigration status.

**☑ Decision Point: Will the PHA admit SV applicants who are unable to provide required SSN or citizenship documentation during the initial eligibility determination?**

Things to Consider

* HCV applicants must disclose and document and PHAs must verify the Social Security numbers (SSN) of each applicant. Generally, a PHA may not admit an applicant until the required documentation is provided to verify the SSN of each household member. Applicant documentation may include a valid SSN card issued by the Social Security Administration; an original document issued by a federal or state government agency that contains the individual’s name, SSN, and other identifying information; or other evidence of the SSN as prescribed by HUD.
* PHAs also must verify evidence of U.S. citizenship or eligible immigration status for noncitizens claiming eligibility for assistance. Each eligible household member must sign a declaration of their status and eligible noncitizens must also provide supporting documentation, which must be submitted by the time of the eligibility determination. Documentation verifying U.S. citizenship may also be requested. Since eligibility for assistance is limited to U.S. citizens and noncitizens who have eligible immigration status, families in which not all members are U.S. citizens or have eligible immigration status are only eligible to receive prorated housing assistance based on the percentage of family members who qualify for assistance.
* This documentation may not be readily on hand and may be difficult to obtain for individuals and families experiencing homelessness. Accepting self-certifications and delaying the receipt of documentation and/or third-party verification will allow PHAs to assist SV families more quickly and provide time for the family (with assistance from the CoC or other partnering agencies) to obtain the necessary documentation.
* HUD waived the requirement to obtain and verify SSN documentation and documentation evidencing eligible noncitizen status before admitting the family to the SV program. PHAs may adopt policies to admit SV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. As an alternative requirement, such individuals must provide the required documentation within 180 days of admission to be eligible for continued assistance, pending verification, unless the PHA provides an extension based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.
* Notice PIH 2022-24 does not provide a timeframe for PHA extensions. The model policies adopt 60 days as a reasonable extension period.
* If a family member appeals secondary verification of immigration documents, PHAs are reminded that assistance may not be delayed, denied, reduced, or terminated on the basis of immigration status pending the completion of the appeal as described in 24 CFR 5.514(e).
* In order to expedite the eligibility process as much as possible, Option 1 states the PHA will admit applicants who are unable to provide required SSN or citizenship documentation during the initial eligibility interview.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will admit SV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. These individuals must provide the required documentation in accordance with policies in Chapter 7 within 180 days of admission. The PHA may provide an additional 60-day extension based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.

If the PHA determines that an ineligible family received assistance, the PHA will take steps to terminate that family from the program in accordance with policies in Chapter 12.

🞎 *Option 2*: *Delete the model plan language and insert the language below.*

The PHA will not admit applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. The PHA will follow HCV policies in Chapter 3 and 7 for the disclosure and documentation of these two factors of eligibility.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Age and Disability Verification**

PHAs may accept self-certification of date of birth and disability status if a higher level of verification is not immediately available. If self-certification is used, the PHA must obtain a higher level of verification within 90 days of admission or verify the information in EIV.

**☑ Decision Point: Will the PHA accept self-certification of date of birth or disability status if other verification is not immediately available?**

Things to Consider

* PHAs must verify each family member’s date of birth to verify identity and determine age and disability status per 24 CFR 5.403, if claimed. These family characteristics impact the income and tenant rent calculations.
* This documentation may not be readily on hand and may be difficult to obtain for individuals and families experiencing homelessness. Accepting self-certifications and delaying the receipt of documentation and/or third-party verification will allow PHAs to assist SV families more quickly and provide time for the family (with assistance from the CoC or other partnering agencies) to obtain the necessary documentation.
* PHAs may accept self-certification of date of birth and disability status if a higher level of verification is not immediately available. If self-certification is used, the PHA must obtain a higher level of verification within 90 days of admission or verify the information in EIV.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will accept self-certification of date of birth and disability status if a higher form of verification is not immediately available. The certification must be made in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified. If self-certification is accepted, within 90 days of admission, the PHA will verify the information in EIV or through other third-party verification if the information is not available in EIV. The PHA will note the family’s file that self-certification was used as initial verification and include an EIV printout or other third-party verification confirming the applicant’s date of birth and/or disability status.

If the PHA determines that an ineligible family received assistance, the PHA will take steps to terminate that family from the program in accordance with policies in Chapter 12.

🞎 *Option 2*: *Delete the model plan language and insert the language below.*

The PHA will not accept self-certification of date of birth or disability status for SV families. The PHA will follow HCV policies in 7 for verification.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Income Targeting**

The PHA must determine income eligibility for SV families in accordance with 24 CFR 982.201 and PHA policy in Chapter 3; however, income targeting requirements do not apply for SV families.

**☑ Decision Point: Will the PHA count SV families toward the PHA’s income targeting requirements?**

Things to Consider

* The income targeting requirements of section 16(b) of the United States Housing Act of 1937 and 24 CFR 982.201(b)(2) are waived and do not apply for SV families so that participating PHAs can effectively serve individuals and families in all the eligibility categories under the ARP who may be at a variety of income levels, including low-income families.
* The PHA may still choose to include the admission of extremely low-income SV families in its income targeting numbers for the fiscal year in which these families are admitted.
* In conformance with normal program rules, PHAs may not deny admission to a family with zero income and must consider hardship circumstances before charging a minimum rent in accordance with 24 CFR 5.630(b).
* In order to give the PHA the greatest flexibility in targeting different income levels, Option 1 states the PHA will not count SV families toward the PHA’s income targeting requirements.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will not include the admission of extremely low-income SV families in its income targeting numbers for the fiscal year in which these families are admitted.

🞎 *Option 2*: *Delete the model plan language and insert the language below.*

The PHA will include the admission of extremely low-income SV families in its income targeting numbers for the fiscal year in which these families are admitted.

🞎 *Option 3*: *Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-VI.F. HOUSING SEARCH AND LEASING**

**Initial Voucher Term**

SV vouchers must have an initial search term of at least 120 days.

🗹 **Decision Point: What is the time limit for the initial term of an SV?**

Things to Consider

* Unlike in the standard HCV program where the minimum initial voucher term is 60 calendar days, SVs must be issued for a minimum initial term of at least 120 days. There is no maximum initial voucher term.
* While the SV program provides the PHA with funding designed to help increase the success rate of SV families in obtaining housing (such as security deposit assistance, landlord incentives, and housing search assistance), these families may still face significant challenges with their housing search.
* The PHA should consider the local housing market when establishing policies governing the voucher term. In areas where the vacancy rate is low and renters compete for affordable units, it is likely to take voucher holders longer to locate an approvable unit. PHAs in these areas may wish to establish a longer initial term for the voucher.
* All other PHA policies on extensions and suspension of vouchers apply.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

All SVs will have an initial term of 120 calendar days.

The family must submit a Request for Tenancy Approval and proposed lease within the 120-day period unless the PHA grants an extension.

🞎 *Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Pre-Inspections**

To expedite the leasing process, PHAs may pre-inspect available units that SV families may be interested in leasing in order to maintain a pool of eligible units.

🗹 **Decision Point: Will the PHA pre-inspect SV units?**

Things to Consider

* To expedite the leasing process, PHAs may pre-inspect available units that SV families may be interested in leasing in order to maintain a pool of eligible units.
* If an SV family selects a unit that passed inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval (Form HUD-52517), the unit may be approved if it meets all other conditions under 24 CFR 982.305. However, the SV family must be free to select his or her unit and cannot be steered to these units.
* Option 1 states the PHA may pre-inspect units in order to give the PHA flexibility to do so. Since most PHAs wish to expedite the lease-up process for SV, it also states that for all other inspections unrelated to pre-inspections, the PHA will make every effort to fast-track inspections.
* If the PHA does not wish to conduct any pre-inspections of available units, the PHA should select Option 2.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

To expedite the leasing process, the PHA may pre-inspect available units that SV families may be interested in leasing to maintain a pool of eligible units. If an SV family selects a unit that passed a pre-inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval, the unit may be approved provided that it meets all other conditions under 24 CFR 982.305. The family will be free to select his or her unit.

When a pre-inspected unit is not selected, the PHA will make every effort to fast-track the inspection process, including adjusting the normal inspection schedule for any required reinspections.

🞎 *Option 2: Delete the model plan language and insert the language below.*

The PHA will not conduct any pre-inspections of available units. The PHA will make every effort to fast-track the inspection process, including adjusting the normal inspection schedule for any required reinspections.

🞎 *Option 3: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Initial Lease Term**

Unlike in the standard the HCV program, SV voucher holders may enter into an initial lease that is for less than 12 months. **No policy decisions are required.**

**Portability**

Under SV, applicant families may move under portability even if the family did not have legal residency in the jurisdiction of the initial PHA when they applied. A receiving PHA cannot refuse to assist an incoming SV family, regardless of whether the PHA administers SVs under its own ACC. **No policy decisions are required.**

**Family Briefing**

The initial PHA must inform the family how portability may impact the special SV services and assistance that may be available to the family.

🗹 **Decision Point: How will the PHA inform the family about how portability may impact their SV services and assistance?**

Things to Consider

* In addition to the applicable family briefing requirements at 24 CFR 982.301(a)(2) as to how portability works and how portability may affect the family’s assistance, the initial PHA must inform the family how portability may impact the special SV services and assistance that may be available to the family.
* The initial PHA is required to help facilitate the family’s portability move to the receiving PHA and inform the family of this requirement in writing, taking reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP).
* Option 1 states this information will be part of the family’s briefing packet.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

In addition to following PHA policy on briefings in Chapter 5, as part of the briefing packet for SV families, the PHA will include a written notice that the PHA will assist the family with moves under portability.

For limited English proficient (LEP) applicants, the PHA will provide interpretation services in accordance with the PHA’s LEP plan (See Chapter 2).

🞎 *Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-VI.G. PAYMENT STANDARDS**

**Overview**

For the SV program, HUD has waived the regulation requiring a single payment standard for each unit size. Instead, the PHA may, but is not required to, establish separate higher payment standards for SVs.

🗹 **Decision Point: Will the PHA implement a higher payment standard for SVs?**

Things to Consider

* The HCV regulations at 24 CFR 982.503(a)(3) provide that the PHA voucher payment standard schedule will establish a single payment standard amount for each unit size, and that for each unit size, the PHA may establish a single payment standard amount for the whole Fair Market Rent (FMR) area or may establish a separate payment standard amount for each designated part of the FMR area.
* Many rental markets with a high need for the SVs are very competitive with a shortage of affordable rental units. SV recipients who are homeless or at risk of homelessness may have relatively lower incomes than regular HCV recipients, limiting their ability to rent units with rents above the payment standard. In addition, landlords may be more reluctant to rent to homeless individuals who may have limited or poor credit history, a limited established rental history, or other issues.
* Due to those factors and the emergency nature of these vouchers, HUD waived 24 CFR 982.503(a)(3) and established an alternative requirement permitting PHAs to establish separate higher payment standards for the SVs in order to increase the potential pool of available units for SV families. The separate SV payment standard must comply with all other HCV requirements under 24 CFR 983.503 with the exception of the waivers of 24 CFR 982.503(b)(i) and 24 CFR 982.503(b)(iii) discussed below.
* Establishing a separate SV payment standard is at the discretion of the PHA and the PHA is not required to do so. PHAs are not permitted to establish a separate payment standard for SVs that is lower than the regular HCV payment standard. If the PHA is increasing the regular HCV payment standard, the PHA must also increase the SV payment standard if it would be otherwise lower than the new regular HCV payment standard.
* In addition, HUD is waiving 24 CFR 982.503(b)(1)(i) and establishing an alternative requirement to allow the PHA to establish a payment standard amount for a unit size at any level between 90 percent and 120 percent (as opposed to 110 percent) of the published FMR for that unit size. HUD approval is not required to establish an SV payment standard within that range.
* Furthermore, HUD is waiving 24 CFR 982.503(b)(1)(iii) and establishing an alternative requirement to provide that a PHA that is not in a designated Small Area FMR (SAFMR) area or has not opted to voluntarily implement Small Area FMRs under 24 CFR 888.113(c)(3) may establish exception payment standards for a ZIP code area above the basic range for the metropolitan FMR based on the HUD published Small Area FMRs. The PHA may establish an exception payment standard up to 120 percent (as opposed to 110 percent) of the HUD published Small Area FMR for that ZIP code area. As is the case for the regular HCV program, the PHA must notify HUD if it establishes an SV exception payment standard based on the Small Area FMR. The exception payment standard must apply to the entire ZIP code area.
* PHAs may also still request approval for exception SV payment standards above 120 percent of the applicable FMR/SAFMR from HUD in accordance with 24 CFR 982.503(b)(1)(iv) or 982.503(c) if needed.
* All rent reasonableness requirements at 24 CFR 982.507 continue to apply to SV units, regardless of whether the PHA has established an alternative or exception SV payment standard.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will not establish a higher payment standard amount for SVs. The PHA will use the same payment standards for HCV and SV.

🞎 *Option 2: Delete the model plan language and insert the language below.*

The PHA will implement higher payment standards for SVs. The SV payment standards are as follows:

**[*Insert SV payment standard amounts*]**

At no time will the SV payment standards fall below the HCV payment standards. If the PHA increases the HCV payment standard, the PHA will also increase the SV payment standard if it would be otherwise lower than the new regular HCV payment standard.

🞎 *Option 3: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**Increases in Payment Standards**

The PHA may, but is not required to, establish an alternative policy on when to apply the increased payment standard, provided the increased payment standard is used to calculate the HAP no later than the effective date of the family’s first regular reexamination following the change.

🗹 **Decision Point: Will the PHA apply increases in payment standards to SVs prior to the family’s first regular recertification?**

Things to Consider

* The HCV regulations at 24 CFR 982.505(c)(4) require that if the payment standard amount is increased during the term of the HAP contract, the increased payment standard amount will be used to calculate the monthly housing assistance payment for the family beginning at the effective date of the family’s first regular reexamination on or after the effective date of the increase in the payment standard amount.
* HUD waived this requirement and as an alternative requirement is providing PHAs with the discretion to establish a policy in the PHA administrative plan on when to apply the increased payment standard (e.g., interim reexamination, owner rent increase) after the effective date of the increase in the payment standard amount, provided the increased payment standard is used to calculate the HAP no later than the effective date of the family’s first regular reexamination following the change.
* The PHA may find that implementing payment standard increases at times other than annual recertification may create additional administrative burden on the PHA. Therefore, Option 1 states the PHA will not adopt this alternative requirement.

🞎 *Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will not establish an alternative policy for increases in the payment standard. PHA policy in Section 11-III.B. governing increases in payment standards will apply to SVs.

🞎 *Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

**19-VI.H. PROJECT-BASED UNITS**

This section describes requirements for project-basing SVs. **No policy decisions are required.**

**FINALIZING THE DOCUMENT**

Take a final look at the changes you have made in this chapter of the administrative plan.  
Have you:

(1) Added or subtracted any exhibits at the end of the chapter?  Yes  No.

(2) Added, subtracted or reordered any major sections (at the A, B, or C level?)  Yes  No

If you answered yes to either of these questions, you must adjust the chapter to match your changes.

**☑ Decision Point: Are any changes required to this chapter?**

No. No changes to the model plan are needed.

Yes. Edits only. Edit and insert PHA language as appropriate.

Yes. PHA changed the organization of the chapter. Adjust the chapter to reflect your changes **and** review the rest of the document to make sure that any references to section numbers are correct.

**☑ Decision Point: Are changes required in other chapters as a result of changes to this chapter?**

Check the “Things to Consider” under each decision point to identify if changes to the model plan policy will require changes to policies in other chapters of the plan.

No. Changes to other chapters are not necessary.

Yes. Changes to the following chapters are also required: