



ADMINISTRATION FOR
CHILDREN & FAMILIES

Family and Youth Services Bureau | 330 C Street, S.W.,
Washington, D.C. 20201 | www.acf.hhs.gov

COVID-19: Frequently Asked Questions (FAQ) Runaway and Homeless Youth (RHY) Program

On March 19, 2020, the Office of Management and Budget (OMB) issued Memorandum M-20-17 providing administrative relief guidance for recipients and applicants of federal financial assistance as federal awarding agencies continue to address recipients and applicants directly impacted by COVID-19. On March 31, 2020, the Department of Health and Human Services' Administration for Children and Families (ACF) issued Information Memorandum IM-ACF-OA-2020-01 offering additional guidance about grant flexibilities to ACF applicants and recipients where the entity is conducting human service activities related to or affected by Coronavirus Disease 2019 (COVID-19).

Based on the guidance provided by OMB and ACF, the Administration on Children, Youth and Families' Family and Youth Services Bureau (FYSB) developed the following Frequently Asked Questions (FAQ) for Runaway and Homeless Youth (RHY) grantees seeking additional information on flexibilities available specific to the administration of grants funded under the RHY Program.

RHY grantees are encouraged to contact their Federal Project Officer (FPO) to discuss individual programmatic, administrative, or financial questions their organization may have, should they need further clarification or direction regarding guidance provided thus far.

1. Can grantees use ACF funds to pay for staff who need to take extended leave for care of family members or themselves?

ACF will allow recipients to continue to charge salaries and benefits to currently active Federal awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. ACF will allow other costs to be charged to Federal awards necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project. ACF will evaluate the grantee's ability to resume the project activity in the future and the appropriateness of future funding, as done under normal circumstances based on subsequent progress reports and other communications with the grantee. ACF will require recipients to maintain appropriate records and cost documentation as required by 45 CFR §75.302 (2 CFR §200.302) (Financial Management and Standards for Financial Management Systems) and 45 CFR §75.361 (2 CFR §200.333) (Retention Requirements for Records) to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services. Further, ACF does not allow grantees to use one federal grant's funds to pay

employees for working on another federal grant. For example, grantees cannot use Street Outreach Program (SOP) funds to pay for employees in their Basic Center Programs (BCP) or Transitional Living Programs (TLP). The Uniform Administrative Regulations provide that, “Any cost allocable to a particular Federal award under the principles provided for in this part may not be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by Federal statutes, regulations, or terms and conditions of the Federal awards, or for other reasons.” 45 CFR 75.405(c).

2. Can Transitional Living Programs (TLP)/Maternity Group Homes (MGH) permit youth to stay beyond the 18/21 months?

Pursuant to the RHY Act (34 USC § 11222(a)(2)), TLP/MGH grantees provide, “...shelter and such services to individual homeless youth throughout a continuous period not to exceed 540 days, or in exceptional circumstances 635 days.

The RHY Act further provides a youth, “...who has not reached 18 years of age on the last day of the 635-day period may, in exceptional circumstances and if otherwise qualified for the program, remain in the program until the youth's 18th birthday.”

Therefore, consistent with the RHY Act, youth entering a TLP/MGH at 16 years old may remain in the program until they turn 18 years old, in exceptional circumstances. Youth who turn 18 or are already 18 years old while in a TLP/MGH may remain in the program for up to 635 days, in exceptional circumstances.

RHY grantees may consider challenges resulting from the current COVID-19 emergency to be exceptional circumstances.

Additionally, youth who are discharged from a TLP and apply for readmission in the future may be eligible for an additional 18 months of shelter and supportive services if the youth meets all RHY eligibility requirements. Programs must document policies regarding readmission of youth and verification of eligibility of youth admitted into the program.

3. Can Basic Center Programs (BCP) allow youth to stay longer than 21 days if they cannot leave (return home and/or have an alternative safe housing option)?

Pursuant to the RHY Act (34 USC § 11211(a)(2)(B)(i)), shelter in a BCP is “not to exceed 21 days.” Once a youth has received 21 days of shelter care in a BCP, the grantee may continue providing shelter care but must do so using a different funding source.

Additionally, youth exiting a BCP may be eligible to return for additional BCP shelter and supportive services if the youth meets all RHY eligibility requirements. Programs must document policies regarding readmission of youth and verification of eligibility of youth admitted into the program.

4. Can Basic Center Programs (BCP) and TLP/MGHs exceed the maximum allowable shelter capacity to accommodate more than 20 individuals?

For youth under the age of 18, pursuant to the RHY Act (34 USC §11212(b)(2)(A-B)), BCPs must have “a maximum capacity of not more than 20 youth, except where the applicant assures that the State where the center or locally controlled facility is located has a State or local law or regulation that *requires* a higher maximum to comply with licensure requirements for child and youth serving facilities; and (B) a ratio of staff to youth that is sufficient to ensure adequate supervision and treatment.” As such, RHY grantees should consult with the appropriate State authority or local regulatory/licensing agencies to determine if it has increased its required maximum capacity for child and youth serving facilities as a result of the COVID-19 emergency.

Specific to TLPs/MGHs, pursuant to the RHY Act (34 U.S.C §11222(a)(4)), the “shelter facility used to carry out such project shall have the capacity to accommodate not more than 20 individuals.” The RHY Rule provides further clarification, at 45 CFR §1351.18(c), by stating that the capacity to accommodate not more than 20 individuals must be “within a single floor of a structure in the case of apartment buildings, with a number of staff sufficient to assure adequate supervision and treatment for the number of clients to be served and the guidelines followed for determining the appropriate staff ratio.”

5. What can providers do to assess for the virus?

RHY grantees are encouraged to work closely with their state and local public health authorities on issues related to addressing COVID-19 in their organizations and communities. A list of state and territorial health departments and links to their websites can be found at the Center for Disease Control and Prevention’s (CDC) Public Health Professionals Gateway: <https://www.cdc.gov/publichealthgateway/healthdirectories/healthdepartments.html>. Additional information is also available at the Runaway and Homeless Youth Training and Technical Assistance Center website: <https://www.rhyttac.net/covid-19>

6. Can we deny youth from entering our shelter if they are positive for the virus?

RHY grantees are encouraged to work closely with their state and local public health authorities on issues related to addressing COVID-19 within their organizations and communities.

If you identify any youth with severe symptoms, notify your public health authority and arrange for the youth to receive immediate medical care. If this is a youth with suspected COVID-19, notify the transfer team and medical facility before transfer.

RHY grantees are encouraged to review the “*Interim Guidance for Homeless Service Providers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)*” available at the CDC website: <https://www.cdc.gov/coronavirus/2019-ncov/community/homeless-shelters/plan-prepare-respond.html>.

Additionally, pursuant to the RHY Rule (45 CFR §1351.22), RHY grantees may adopt criteria “to determine eligibility for the program, or any activity or service, [that] may include an assessment of the needs of each applicant, and the health and safety of other beneficiaries, among other factors.”

7. What guidance is available for programs running RHY Street Outreach Programs (SOP)?

RHY grantees are encouraged to review the “*Interim Guidance for Homeless Service Providers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)*” available at the CDC website: <https://www.cdc.gov/coronavirus/2019-ncov/community/homeless-shelters/plan-prepare-respond.html>

8. Will RHY SOPs be out of compliance if they shut-down street outreach activities due to COVID-19 issues?

RHY grantees are encouraged to work closely with their state and local public health authorities on issues related to addressing COVID-19 within their organizations and communities specifically related to conducting outreach or operating a drop-in center. SOP grantees are encouraged to continue street outreach activities to the greatest extent practicable and consistent with public health guidance. However, SOP grantees who must suspend street outreach activities or need additional flexibilities due to COVID-19 should contact their FPO to discuss the program activities impacted.

Additionally, RHY grantees are encouraged to review the “*Interim Guidance for Homeless Service Providers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)*” available at the CDC website: <https://www.cdc.gov/coronavirus/2019-ncov/community/homeless-shelters/plan-prepare-respond.html>.

Finally, as noted in ACF’s March 31, 2020 communication to federal award recipients, ACF will waive prior approval requirements for allowable costs within program-specific authorities, as necessary, to effectively address the COVID-19 response. All costs charged to Federal awards must be consistent with Federal cost policy guidelines and the terms of the award, except where otherwise specified. ACF is requiring recipients to maintain appropriate records and cost documentation as required by 45 CFR §75.302 (2 CFR §200.302) (Financial Management and Standards for Financial Management Systems) and 45 CFR §75.361 (2 CFR §200.333) (Retention Requirements for Records), to substantiate the charging of any cancellation or other fees related to interruption of operations or services.

9. Do RHY grantees have flexibility in implementing required RHY training requirements among staff who typically do not serve in direct care of youth?

RHY grantees should follow their organizational policies and/or local/state licensing requirements pertaining to training requirements related to staff/volunteers appropriately cleared to have contact with youth receiving services.

10. Will FYSB continue with on-site monitoring?

The RHY program is postponing all on-site program monitoring activities at this time, due to concerns for the safety of grantee staff, youth, and federal staff. On-site monitoring will resume in the future, when deemed safe to do so. FPOs will continue scheduling bi-monthly program calls with individual grantees, as well as regionally based group calls to provide technical assistance and engage Runaway and Homeless Youth Training and Technical Assistance Center (RHYTTAC) for additional training and technical assistance (T&TA), as needed.

11. Will FYSB continue with the Regional Grantee meetings?

All RHY Regional Grantee meetings scheduled through the end of May 2020 have been postponed.

12. Can a RHY grantee prorate match requirements because funds are unable to be raised during this crisis?

RHY grantees are encouraged to review their Notice of Award (NoA) to determine if the non-federal share (matching/cost sharing) is more than 10 percent of the total, approved cost of the project. The non-federal share may be met by cash or in-kind contributions, although applicants are encouraged to meet their match requirements through cash contributions.

If the amount in the NoA exceeds the 10 percent statutory requirement for matching, where justified, the grantee may request prior approval to reduce the match to no less than the statutory requirement.

13. Can RHY grantees modify the outcomes in grant agreements?

RHY grantees are encouraged to consult with their Grants Management Specialist and FPO to determine if an official change of scope of project outcomes is necessary. However, as stated in [IM-ACF-OA-2020-01](#), ACF will evaluate a grantee's ability to resume the project activity in the future and the appropriateness of future funding, as done under normal circumstances, based on subsequent progress reports and other communications with the grantee.

14. What flexibilities do grantees have to make budget modifications to respond to the crisis?

ACF will waive prior approval requirements if the costs are directly related to the COVID-19 emergency, as necessary, to effectively address the response. All costs charged to Federal awards must be consistent with Federal cost policy guidelines and the terms of the award, except where specified. ACF is requiring recipients to maintain appropriate records and cost documentation as required by [45 CFR §75.302 \(2 CFR §200.302\)](#) (Financial management and Standards for Financial Management Systems) and [45 CFR §75.361 \(2 CFR §200.333\)](#) (Retention Requirements for Records), to substantiate the charging of any cancellation or other fees related to interruption of operations or services. As appropriate, ACF will list additional guidance on specific types of costs being allowed (or not allowed) on our websites and/or will provide a point of contact for an ACF program official.

RHY grantees are encouraged to review previously published FAQs located on the Runaway and Homeless Youth Training and Technical Assistance Center (RHYTTAC) website at: <https://www.rhyttac.net/assets/docs/Resources/FYSB%20RHY%20Program%20FAQs.pdf>.