

Runaway and Homeless Youth Programs are funded by the Family and Youth Services Bureau (FYSB) to provide specific services, as defined by federal legislation, regulations, and language included in applicable funding opportunity announcements. RHY grantees have shared questions, and to the extent possible, these questions have been categorized and corresponding guidance has been provided in this document. Where applicable, specific links to resources and references to the legislation have been included in the answers. Your assigned federal project officer is the best initial point of contact for questions related to the operation of your FYSB-funded program.

Definitions

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

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

Runaway youth: An individual under 18 years of age who absents himself or herself from home or place of legal residence without the permission of a parent or legal guardian.

Homeless youth: An individual who cannot live safely with a parent, legal guardian, or relative, and who has no other safe alternative living arrangement. For the purposes of basic center eligibility, a homeless youth must be less than 18 years of age (or higher if allowed by a state or local law or regulation that applies to licensing requirements for child- or youth-serving facilities). For purposes of Transitional Living Program eligibility, a homeless youth cannot be less than 16 years of age and must be less than 22 years of age (unless the individual commenced his or her stay before age 22, and the maximum service period has not ended).

2. How does the FYSB expect programs to determine if a youth is “away from home without parental permission”? How does the FYSB want this determination documented?

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

RHY Rule ([45 CFR § 1351.24](#)(e)): BCP grantees shall, as soon as feasible and no later than 72 hours of the youth entering the program, contact the parents, legal guardians, or other relatives of each youth, according to the best interests of the youth. If a grantee determines that it is not in the best interest of the client to contact the parents, legal guardian or other relatives of the client, they must (i) inform another adult identified by the child, (ii) document why it is not in the client’s best interest to contact the parent, legal guardian or other relative and (iii) send a copy of the documentation to the regional program specialist for review.

3. How is outreach defined?

RHY Rule ([45 CFR § 1351.1](#))/([45 CFR § 1351.27](#)): Outreach means finding runaway, homeless, and street youth, or youth at risk of becoming runaway or homeless, who might not use services due to a lack of awareness or active avoidance, providing information to them about services and benefits, and encouraging the use of appropriate services. Outreach includes low-barrier services, such as providing food and personal hygiene packs.

4. What is the definition of aftercare?

RHY Rule ([45 CFR § 1351.1](#)): Aftercare means additional services provided beyond the period of residential stay that offer continuity and supportive follow-up to youth served by the program. The current expectation as identified in the RHY Rule is that aftercare services for BCP and TLP are provided for a minimum of three months.

5. What is the clear definition of prevention?

While there is no formal definition of prevention in the RHY Act or the RHY Rule, the RHY Rule (45 CFR § 1351.10) states that the purpose of RHY program grants is, "...to establish or strengthen community-based projects to provide runaway prevention, outreach, shelter, and transition services to runaway, homeless, or street youth or youth at risk of running away or becoming homeless.

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

Therefore, prevention efforts under RHY are achieved through voluntary home-based services and must be for the specific purpose of preventing youth from running away or otherwise becoming homeless.

All RHY Programs, including Basic Center, Transitional Living and Street Outreach Programs are required to perform outreach in order to attract individuals who are eligible to participate in the program.

6. How is respite defined?

The FSYB does not have an official definition for respite; however, the Lifespan Respite Care Act of 2006 (Pub.L. 109-442) defines respite care as "planned or emergency care provided to a child or adult with a special need in order to provide temporary relief to the family caregiver of that child or adult." With temporary relief to the caregiver being the critical component of this definition, RHY programs should not provide respite care utilizing RHY funding. In other words, placing a youth in a BCP because of a parent's conflicting responsibilities, travel needs, or being overwhelmed by the behavior of the youth, or because a parent or legal guardian needs a break from providing care to a youth is not legitimate justification for seeking BCP emergency shelter services. If, however, a youth's parents or legal guardian refuses to allow the youth in the home, and the youth does not have a safe alternative, or the youth indicates he or she will run away if forced to remain in the home, the youth may be considered eligible for a BCP.

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

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

7. Which definition – FYSB or HUD – takes precedence in RHY programs?

RHY programs are funded by the FYSB, and therefore, grantees must comply with all requirements and definitions set forth in the [RHY Act](#), RHY Rule ([45 CFR § 1351](#)), and applicable Funding Opportunity Announcements (FOAs).

8. What are the “Core 4,” and how is each of the areas defined?

The RHY Rule ([45 CFR § 1351.30](#))/([45 CFR § 1351.31](#)) require each Basic Center Program (BCP), Transitional Living Program (TLP), and Maternity Group Home (MGH) grantee to collect data that demonstrates their ability to meet the performance standards described in the RHY Rule. Specifically, BCP, TLP and MGH projects are required to measure goal attainment based on the four core outcomes: (1) social and emotional well-being; (2) permanent connections; (3) education or employment; and (4) safe and stable housing.

- (1) Social and emotional well-being means the development of key competencies, attitudes, and behaviors that equip an RHY to avoid unhealthy risks and to succeed across multiple domains of daily life, including school, work, relationships, and community.
- (2) Permanent connections refer to ongoing attachments to families or adult role models, communities, schools, and other positive social networks which support young people’s ability to access new ideas and opportunities to thrive, and they provide a social safety net when young people are at risk of re-entering homelessness.
- (3) Education or employment means performance in and completion of education and training activities, especially for younger youth, as well as starting and maintaining adequate and stable employment, particularly for older youth.
- (4) Safe and stable housing refers to a safe and reliable place to call home.

9. According to FYSB’s RHY Program, what is the definition of homelessness?

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

Eligibility

10. Are youth eligible for shelter if they are picked up and dropped off by law enforcement? Yes, as long as the youth meets the definition of a runaway and homeless youth, and law enforcement is not mandating or requiring the youth stay in the shelter.

11. Can youth with a probation officer be served in a Basic Center Program (BCP) utilizing FYSB funds?

The grantee must determine if the youth is on probation and still under the guardianship of a parent or relative or if the youth's legal guardian is the state. If the youth is on probation, not in state custody, and otherwise meets the definition of a runaway or homeless youth, the youth would be eligible for services. If the youth is on probation AND the legal guardian is a state agency, then he/she is a system youth, and FYSB funds cannot be used for shelter care. Grantees should work with their local juvenile justice services on an agreement to receive payment for shelter care in these situations.

12. Can a youth be ordered into programming by a court to receive Family and Youth Service Bureau (FYSB)-funded BCP services?

No, RHY services are voluntary. Grantees should work with their local courts to develop an agreement to receive payment for shelter care in these situations.

13. Can a youth dropped off by child welfare, because they do not have an available home, be served utilizing FYSB funds?

If child welfare has taken custody of the youth, then the answer is no. The grantee should work with their local child welfare on an agreement to receive payment for shelter care in these situations. If child welfare has not assumed legal custody or guardianship of the youth, and the youth otherwise meets the definition of a runaway or homeless youth, the youth would be eligible for RHY services funded by FYSB. If child welfare is conducting an investigation and deems the child is unsafe in their home while the investigation is occurring, the child does not meet the definition of runaway or homeless, as the state has removed them from their parental/guardian pending further investigation; the grantee should work with child welfare to secure payment for services in these situations.

14. Can child welfare use a Transitional Living Program/Maternity Group Home Program (TLP/MGH) as a discharge plan for youth aging out of state care?

FYSB has no authority or guidance on how child welfare develops their discharge plans. However, the youth must meet the definition of runaway or homeless youth to be eligible for TLP/MGH services. It is not best practice for child welfare organizations to intentionally discharge a youth aging out of care into temporary housing for runaway and homeless youth.

15. Can a youth with a history of being in the child welfare system access FYSB-funded services?

Yes, as long as the youth is not currently in the custody of the child welfare system and meets the definition of runaway or homeless youth.

16. Can Maternity Group Home Programs serve young couples?

There are no restrictions in the RHY Act or RHY Rule preventing couples from receiving MGH services. Both youth would need to meet the definitions and requirements for RHY eligibility, and

the grantee would need to ensure this arrangement would not be in violation of local, regional, and/or state laws and licensing requirements.

17. Is a youth eligible for shelter if law enforcement removes youth from a family situation based on safety of the youth?

Yes, until such time that child welfare takes custody of the youth (if applicable). Note, the grantee must comply with any notification procedures as identified in applicable licensing requirements.

18. What is the age range of eligibility for a Street Outreach Program (SOP)?

Street Outreach Programs are funded to provide direct outreach to runaway and homeless youth as well as to provide supplemental outreach resources to Basic Center, Transitional Living Programs and Maternity Group Homes. Therefore, the age ranges served by SOP tend to align with the service population agencies serve, as identified by the applicable RHY programs in each community.

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

The age of eligible youth for RHY programs is defined in legislation and cannot be changed outside of Congressional action.

20. Are programs expected to require identification from street youth to confirm they are within the age range allowed by FYSB?

There is no requirement in the RHY Act, RHY Rule, or associated RHY FOAs requiring youth to provide identification. It is up to the grantee to ensure to the best of their ability, that the youth meets the age requirement to be eligible for RHY services. Such efforts to determine eligibility must be documented.

Basic Center Program (BCP)

21. Are there any common practices, policies, procedures, or standards that any BCP is using in searching for weapons and contraband?

Each RHY program determines the best practices to ensure safety for RHY and staff. Many RHY programs consult with local law enforcement to train staff on issues of safety and identification of contraband. For specific ideas, consider posting your question to the RHYTTAC Communities of Practice (CoP) for RHY grantees.

22. Is there a minimum number of days a youth must be in a BCP in order for the program to “count” them as receiving residential shelter services?

There is no minimum number of days a youth must be in a BCP to be counted as receiving shelter services. The maximum stay is 21 days in a BCP under FYSB funding.

23. Is the age range for BCP “up to 18,” “exactly 18,” or “through 18”?

The phrase “up to 18,” means until their 18th birthday. In other words, BCP shelter care is intended for RHY youth 17 years, 364 days or younger.

24. If a youth is 17 and 364 days when they are admitted to BCP, are they eligible for up to 21 days of service?

No, once a youth turns 18 years of age, the youth is no longer eligible for BCP services unless licensing requires the grantee to serve youth over the age of 17 as part of state or local law or regulation that applies to licensure requirements for child- or youth-serving facilities. In this case, such requirements must be documented in the youth’s file. Grantees are expected to begin

discharge planning at intake. Case planning, even over the course of 24 hours, should focus on anticipated shelter needs, potential referrals and aftercare planning. While access to FYSB funding shelter services ends once the youth turns 18, aftercare provisions are still allowed for the required three-month period. Note, if a grantee chooses to serve a youth who has turned 18 using other funds, the supervision and separation of this youth from minors is still expected.

25. Does placement in a kinship home “count” toward meeting numbers of youth sheltered by BCP?

Shelter days are counted only when the RHY youth is in a BCP facility or agency-authorized host home based on the model of shelter services approved by FYSB as part of the grant application for the organization. If a youth otherwise meets the definition of RHY and is placed with a family member as an alternative to shelter, this placement may be identified as prevention.

26. How should programs document if a youth was initially served in a BCP and then moved to aftercare?

The FYSB does not provide guidance on this process. Other than required documentation in RHY-HMIS, the FYSB leaves decisions on how to document services provided to RHY to each grantee. Some grantees simply include this information in the discharge summary indicating the start and end dates of shelter care as well as a description of aftercare services to be provided.

27. Is there an opportunity to operate a BCP specifically for 18-24-year-old RHY?

Generally speaking, the answer would be no. Unless the shelter-licensing unit in your state requires you serve youth over the age of 17 as part of state or local law or regulation that applies to licensure requirements for child- or youth-serving facilities, once the youth turns 18 years of age, he/she is no longer eligible for BCP services.

28. If a youth is in a BCP beyond 21 days, is it possible for a federal project officer (FPO) to provide written authorization for the BCP to utilize FYSB funds to serve that youth? If so, what is the process for obtaining this authorization?

Once a youth has received 21 days of shelter care in a BCP, the grantee may continue providing shelter care but cannot do so utilizing RHY funding.

29. What if a youth needs to stay longer than 21 days in a BCP? Can FYSB funds be utilized to pay for services beyond 21 days?

Once a youth has received 21 days of shelter care in a BCP, the grantee may continue providing shelter care but cannot do so utilizing RHY funding. Grantees should consult with your assigned FPO for any questions regarding stay.

30. Can a youth be “discharged for an hour or two” and readmitted later the same day in order to be eligible for additional days in the BCP utilizing FYSB funds?

The RHY Act and the RHY Rule do not provide guidance regarding a youth leaving and then being readmitted as it pertains to the 21-day limitation. Youth do come and go from BCP facilities, and with each new admission, the time period may begin again. In this case, the phrase (in order to be eligible) implies the grantee is discharging the youth, not because he or she has a plan of discharge or a safe place to go, but rather to reset the clock to provide additional time for the RHY to receive services. Grantees must thoroughly document eligibility of RHY at each intake and must also document a discharge plan and aftercare services as well.

31. If a youth turns 18 on day ten of a BCP shelter stay, can they continue to reside in the shelter? If so, can FYSB funds continue to be utilized to provide BCP services? If not, should

the youth be discharged to an adult shelter? If the youth goes into an adult shelter, can the BCP utilize FYSB funds to continue providing aftercare supports and/or case management services?

Once a youth turns 18 years of age, they are no longer eligible for BCP services unless shelter licensing in their state requires them to serve youth over the age of 17 as part of their state or local law or regulation that applies to licensure requirements for child- or youth-serving facilities. The FYSB does not recommend discharge options, as the appropriate plan varies from youth to youth. Discharge planning, which begins at intake, should include options for when the youth reaches the age of 18. Once a youth is discharged, whether to another program or shelter, the grantee is expected to provide aftercare services for up to three months post-discharge from the BCP. This is true even if the youth turns 18 immediately prior to discharge.

32. What are allowable outreach activities for BCP?

Outside of the following definition found in the RHY Rule, grantees are encouraged to plan and implement outreach activities that will result in identifying and attracting eligible RHY youth to receive services.

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

33. What are allowable aftercare activities for BCP?

Aftercare is defined as the additional services provided beyond the period of residential stay that offer continuity and supportive follow-up to youth served by the program ([45 CFR § 1351.1](#)). Grantees should plan and implement aftercare activities that will give youth opportunities to make informed decisions about the support and services they need to receive, develop a plan for permanency, and identify and achieve their personal goals.

34. What are allowable prevention activities for BCP?

While there is no formal definition of prevention in the RHY Act or the RHY Rule, the RHY Rule (45 CFR § 1351.10) states that the purpose of RHY program grants is, "...to establish or strengthen community-based projects to provide runaway prevention, outreach, shelter, and transition services to runaway, homeless, or street youth or youth at risk of running away or becoming homeless.

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

Therefore, prevention efforts under RHY are achieved through voluntary home-based services and must be for the specific purpose of preventing youth from running away or otherwise becoming homeless.

All RHY Programs, including Basic Center, Transitional Living and Street Outreach Programs are required to perform outreach in order to attract individuals who are eligible to participate in the program.

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

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

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

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

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

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

36. Do the children of youth served by TLP or MGH programs “count” toward the number of youth served by the program (e.g., if a program’s grant application says they will have eight beds, is it okay if they use four for youth and four for children of youth? Or, would the grant application be interpreted to mean the program would have eight beds for RHY and additional beds for their children)?

Youth eligible for TLP or MGH services must be between 16-21 years of age at the time of program entry (see definition of homeless youth for further details). However, pursuant to [34 U.S.C § 11222(a)(4)] of the [RHY Act](#), the “...shelter facility used to carry out such project shall have the capacity to accommodate not more than 20 individuals.” Therefore, the count of number of youth served cannot exceed the combination of “eligible” youth and their dependent children. Additionally, a TLP providing MGH services and standalone MGH projects must create a separate file for the young person’s infant or child. At a minimum, information contained in the file should include record of well-care visits, sensory and developmental screenings, and assessments.

37. A youth enters a TLP, stays 6 months, and then is discharged. If the youth needs to re-enter the TLP for additional support, is the youth entitled to receive an additional 18 months of service, or is their stay limited to 12 months on the re-enrollment?

Youth who are discharged from a TLP and apply for readmission in the future may be eligible for an additional 18 months of services if the youth meets all RHY eligibility requirements. RHY

programs must document policies regarding readmission of RHY and verification of eligibility of youth admitted into the program.

38. Can TLPs and MGHs maintain a waiting list? If so, how long can youth remain on a waiting list?

FYSB does not prescribe guidance or limitations for a waiting list, or how long a youth can remain on a waiting list. This decision would be left to the grantee.

39. Can TLPs and MGHs use FYSB funds to provide non-residential services to youth who do not want to access residential services?

The emphasis on provided services is to ensure youth are no longer homeless. Programs utilizing FYSB funding are encouraged to address the support needs of youth once they enter shelter services to ensure successful transition to safe and stable living situations at discharge.

40. Can TLPs and MGHs use FYSB funds to provide non-residential services to eligible youth on a waiting list? If so, how long can they receive these services without accessing residential programming?

TLP and MGH programs are funded for runaway and homeless youth to have access to the supportive services necessary to transition from homelessness to safe and stable living situations. FYSB funding may only be used for youth who are residents of the TLP/MGH program. Aftercare services may be provided to youth after discharge from residential services.

41. What are allowable outreach activities for TLPs and MGHs?

Outside of the following definition found in the RHY Rule, grantees are encouraged to plan and implement outreach activities that will result in identifying and attracting eligible RHY youth to receive services.

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

42. What are allowable aftercare activities for TLPs and MGHs?

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

43. What are allowable prevention activities for TLPs and MGHs?

The FYSB does not specifically define prevention. See response to question #5.

44. How should TLPs and MGHs serve youth that are 16-17 years of age in comparison to youth 18+? Can 16-17-year-old RHY be housed with 18+-year-old RHY in TLPs and MGHs?

Youth ages 16-17, who meet eligibility for TLP/MGH should receive all services and supports mandated by the RHY Act, the RHY Rule, and in accordance with the applicable FOA. Grantees must comply with local and state regulations and licensing requirements when determining if minors can be housed in the same facility as young adults.

45. If a youth enters at 21 years, 364 days old, can they remain in the program the full 18 months?

Yes. For purposes of TLP eligibility, a homeless youth cannot be younger than 16 years of age and must be less than 22 years of age (unless the individual commenced his or her stay before age 22, and the maximum service period has not ended). ([45 CFR § 1351.1](#))

Street Outreach Program (SOP)

46. What are best practices for operating a drop-in center as a component of a FYSB-funded SOP?

The FYSB does not provide specific guidance on operating a drop-in center in relation to “best practices” or the development of policy and procedures for programmatic operation. Grantees are encouraged to work with RHYTTAC to learn current best practices in the field and participate in the RHYTTAC Communities of Practice (CoP) to leverage expertise of grantees currently operating successful drop-in centers. Grantees must ensure SOP services are NOT limited to drop-in center services and supports.

47. Can SOP services in rural areas be focused on school/community center-based outreach because youth in rural areas are not typically “on the street”?

No. SOP programs are by definition street outreach. Even in rural areas, RHY youth are on the street, as they are homeless. School and community centers are other opportunities to identify and locate RHY youth, but street outreach is the core of this program and a required activity for this funding.

48. Does kinship placement count toward the number of youth who exit the street as a result of SOP contact?

If the kinship placement is temporary, then the answer would be no. However, youth successfully exiting the street into a permanent or long-term placement would be counted.

49. What are allowable outreach activities for SOP?

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

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

50. What are allowable aftercare activities for SOP?

Street Outreach Programs are not required by statute or regulation to provide aftercare services. Aftercare, as defined at ([45 CFR § 1351.1](#)), is only required for BCP and TLP grantees. SOP grantees are required, as a program requirement in the FOA, to provide follow-up care that includes, but is not limited to, visits, calls, and any other forms of open and active communication.

Applicable to all RHY Program Services

51. What is the FYSB’s expectation regarding documentation when aftercare is refused by the youth or family?

The FYSB does not provide specific guidance; however, most grantees simply state this information in the youth’s file.

52. Is there an expectation that the program offer aftercare services a certain number of times after an initial refusal to accept?

Aftercare services are to be provided for at least three months after the youth exits a RHY program. The FYSB does not provide guidance on the number of times to offer these services after the initial refusal to accept.

53. How is coordinated entry intended to work for youth?

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

54. How do programs ensure confidentiality of minors receiving services in a coordinated entry system?

Each CoC has specific regulations, policy, and procedures for protecting the confidentiality of minors. If the CoC does not have current written policy/procedures, the grantee should provide guidance for establishing some in accordance with confidentiality/HIPPA requirements related to data of minors.

55. Are all RHY program types required to address the “Core 4” (stable housing, permanent connections, education or employment, and well-being)? Is there written guidance on how each program type is expected to address each of these?

No, by RHY Rule, only BCP and TLP or MGH programs are required to address the Core 4. SOP grantees are strongly encouraged to build program models that are responsive to the Core 4, and all grantees are required to identify the ways their RHY program will address the requirements in the grant proposal. Once funded, grantees are required to provide services as proposed and document the impact of such services as applicable and feasible, given the type of services provided to each youth.

56. Can undocumented minors access RHY program services without RHY staff being required to contact Immigration and Customs Enforcement?

The RHY Program does not collect information on youth’s immigration status.

57. Are RHY staff mandated reporters of abuse, neglect, abandonment, etc.? If so, what documentation does the FYSB expect programs to maintain to prove a report was made?

Each state has their own laws regarding the report of abuse, neglect, and abandonment. Grantees must comply with all local, regional, and state laws regarding documenting and reporting abuse and neglect.

58. What if a child abuse or neglect report is made, but the child welfare system states the case will not be investigated because the youth is 16 or 17?

The FYSB does not provide any guidance on these situations, as child welfare systems operate differently in each state.

59. How do programs classify services beyond aftercare?

The FYSB does not define a maximum length of time aftercare can be provided to youth who have exited residential services. Therefore, ongoing services could be classified as aftercare to assist youth in achieving targeted goals. Such services must be documented in the youth's file and directly tied to an aftercare plan, which must also be included in the youth's file.

60. How long can youth receive prevention services?

The RHY Act, RHY Rule, and FOA do not provide a limitation on length of time youth can receive prevention services. All services are to be provided to eligible youth and documented in the youth's file.

RHY Program Operations

61. What is the requirement related to background checks for RHY staff and volunteers?

RHY Rule [[45 CFR § 1351.23\(j\)](#)] requires complete background checks for all paid and non-paid staff who have regular and unsupervised contact with youth as well as for all adult occupants of host homes. Required background checks include:

- State or tribal criminal history records, including fingerprint checks
- FBI criminal history records, including fingerprint checks, to the extent the FYSB determines this to be practicable and specified in FOA
- Child abuse and neglect state registry check, to the extent the FYSB determines this to be practicable and specified in FOA
- Sex offender registry check
- Any other checks required by state law
- Conduct checks as appropriate to job function — education credentials and employment experience, driving record, and professional license
- Document the justification for hire where an arrest, pending criminal charge, or conviction is present

62. If local or state laws and regulations conflict with FYSB requirements, federal legislation, and/or the RHY Rule, how do programs resolve the conflict?

As a general principle, federal laws and regulations preempt state laws and regulations. This principle comes from the Supremacy Clause of the U.S. Constitution. The Supreme Court has explained that “any state law, however clearly within a state’s acknowledged power, which interferes with or is contrary to federal law, must yield.” *Gade v. Nat’l Solid Wastes Mgmt. Assn.*, 505 U.S. 88, 08 (1992).

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

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

63. If a state has a regulation that requires or allows shelters to provide services to youth up to 19 years of age in order to be licensed, can the BCP utilize FYSB funds to provide services

for youth 18+? If not, can the BCP continue to provide residential services to the youth utilizing other funding?

Unless the shelter licensing unit in your state requires you serve youth over the age of 17 as part of state or local law or regulation that applies to licensure requirements for child- or youth-serving facilities, then once the youth turns 18 years of age, he/she is no longer eligible for BCP services. If licensing in your state allows, but does not require, you to serve youth over the age of 17 years, then that is not in compliance with RHY funding.

64. How does the FYSB recognize the difference between rural vs. non-rural programs?

The FYSB does not have specific definitions of rural and urban. The United States Census Bureau defines the terms as follows:

The Census Bureau identifies two types of urban areas:

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

U.S. Census Bureau. *Geography Reference: Urban and Rural*. Retrieved December 7, 2018, from: <https://www.census.gov/geo/reference/urban-rural.html>.

The Department of Housing and Urban Development defines rural as:

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

U.S. Department of Housing and Urban Development. *Rural Housing and Economic Development* from: <https://www.hudexchange.info/programs/rhed/>.

Partnerships and Co-laborers

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

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

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

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

66. Who can RHY programs contact when a McKinney-Vento Liaison is not willing to provide services to RHY (e.g., not enroll them in their home school, not provide transportation, etc.)

If an RHY grantee is working with a young person and experiencing challenges in working with the school district that local discussions have been unable to resolve, the school or RHY grantee may

contact the State Coordinator for Homeless Education to request assistance in resolving the issue. State Coordinator contact information can be accessed by clicking on the state at <https://nche.ed.gov/data/>. If the issue is still unresolved after speaking with state-level contacts, the school and/or RHY grantee may contact the National Center for Homeless Education at 800.308.2145 or homeless@serve.org.

67. What are best practices for establishing and maintaining strong working relationships with child welfare personnel to meet the needs of RHY?

RHY programs can meet with local child welfare administrators and personnel to ensure understanding of the services of the RHY program and which youth are eligible for RHY services. Inviting child welfare workers to RHY trainings and attending training offered by child welfare agencies can increase the shared understanding of terminology and responses to community needs. Partnering with child welfare agencies to address shared community concerns, such as homelessness and trafficking, can build the partnership, which benefits all involved when challenges arise.

68. How can RHY providers address apathy regarding youth in local communities?

RHY providers are in an excellent position to educate community members on the needs of RHY and how communities can play a role in helping youth. Apathy often evolves from a lack of information or misinformation. Sharing your knowledge regarding youth is a helpful first step.

69. Can the FYSB and HUD work together to identify data/reporting/eligibility requirements?

The FYSB and HUD are working together to identify solutions to challenges related to multiple aspects of service provision and data reporting. Grantees will receive updated information as it becomes available.

General Technical Assistance and Training

70. Are there FYSB-approved case file forms, case file formats, intake assessment forms, etc.?

The FYSB does not specifically approve agency-level forms. All RHY programs are required to document eligibility, guardian notification, if applicable, and the assessment of needs, services provided, outcomes, and aftercare plans.

71. Is there additional information forthcoming on FYSB's expectations for programs in relation to return on investment (ROI)?

The RHYTTAC is partnering with subject matter experts and the FYSB to create and maintain updated resources on RHY Program ROI.

72. How does the FYSB utilize the Performance Progress Report (PPR)?

The FYSB utilizes the PPR to determine whether grantees are implementing the goals, objectives, and activities as described in an approved grant application. Grantees will be monitored based on their compliance with these performance standards and measures. Federal Project Officers (FPOs) utilize the PPR to determine whether a program has issues with non-compliance and requires a corrective action plan (CAP) to include technical assistance to support the program in getting back on track with their stated goals and objectives. Grantees' performance on these standards may also be used when deciding which RHY applications to include in future funding opportunities.

73. Is there a tip sheet or one-page document of the programmatic requirements (legislative, regulatory, FYSB-specific, RHY Rule) for each program type?

[RHY Rule Factsheet](#)
[RHY Rule](#)

74. Is there a tip sheet or one-page document on the Families First Prevention Service Act and how it impacts RHY programs?

As states implement the provisions of this legislation, the FYSB will be tracking the impact on RHY programs. The RHYTTAC will continue to post information, as available, to the [RHYTTAC website](#).

75. Where can I learn more about how RHY programs can access services and supports from the TRIO Education Programs for eligible youth?

Facilitated Webinar: ED - HHS Collaboration in Support of Disconnected Youth: An Introduction to Student Service" available on eLearning.

76. How do grantees access the Community of Practice?

The Community of Practice (CoP) site is a meeting place that provides FYSB-funded RHY grantees with opportunities to participate in discussion forums, view member profiles, peruse the photo gallery, store files, and more.

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

77. Where can I find a list of all mandated services for RHY programs?

- Runaway and Homeless Youth Program Authorizing Legislation
<https://www.acf.hhs.gov/fysb/resource/rhy-act>
- RHY Rule
<https://www.acf.hhs.gov/fysb/resource/rhy-program-regulations>
- Approved Grant Applications
- FYSB Website (www.acf.hhs.gov/fysb)
- Program Fact Sheets (Basic Center, Street Outreach, Transitional Living & Maternity Group Home)
<https://www.acf.hhs.gov/fysb/resource/bcp-fact-sheet>
<https://www.acf.hhs.gov/fysb/resource/sop-fact-sheet>
<https://www.acf.hhs.gov/fysb/resource/tlp-fact-sheet>
<https://www.acf.hhs.gov/fysb/resource/mgh-fact-sheet>
- New Grantee Orientation Webinar on the RHYTTAC's [eLearning site](#)

78. Can all RHY staff access eLearning?

RHYTTAC eLearning is a federally-funded training portal for employees working within RHY-funded services. By definition, this means staff members who are included within approved federal grant budgets. Unfortunately, the RHYTTAC cannot approve subscriptions for all staff of organizations. For example, an organization may have 70 staff. Of those staff, 22 receive all or some part of their salaries from RHY funding or provide time utilized as identified within the approved grant. The organization would be eligible for 22 eLearning slots. Please double-check approved RHY grant(s) budget(s) prior to requesting slots for employees. If there are concerns, RHYTTAC staff will check the grant budgets to confirm the allotment. Additional eLearning seats are available for other employees of your organization as well as for anyone else interested in participating in eLearning courses, per subscription paid annually. To register for eLearning, visit: <https://www.rhyttac.net/elearning>.

79. Where can I find the monitoring tool to prepare for an upcoming monitoring visit?

The FYSB has recently updated the RHY monitoring instrument and the RHYTTAC will post information on the role of the peer monitor and the process when available.

For hints for successful monitoring visits, go to the RHYTTAC's website (www.rhyttac.net) or click on the following link: <https://www.rhyttac.net/monitoring>

80. Do all staff of an RHY agency need to be trained on all required training topics? For example, one of the required topics is fiscal management. This topic may not be relevant for direct care workers. How do I know which employees need to complete which trainings?

The FYSB requires training for all staff of RHY grantees. These trainings are outlined in funding opportunity announcements (FOA) under the *Training Plan* section for Basic Center Programs (BCP), Street Outreach Programs (SOP), Transitional Living Programs (TLP), and Maternity Group Homes (MGH) as well as in the RHY Rule. Many of these topics are addressed in the eLearning selections available to RHY grantees. Webinars, TA Clinics, and conference sessions also address these topics. Please consult the FOA(s) under which you are currently funded for the full list of required topics.

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

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

81. If training requirements are already included in an organization's standard operating procedures, should the training topics be repeated to meet FYSB requirements?

If RHY staff received previous training already required by your organization that falls under the FYSB-required training topics, personnel files should include documentation of those trainings, including date, topic, and presenter or source of training.

82. What is the training expectation for new hires? Is it sufficient to offer training on all topics annually?

Projects must ensure that all paid and volunteer workers are trained on the core competencies of youth workers necessary to carry out the objectives and activities of the project. Many of these topics are addressed in the eLearning selections available to RHY grantees. Webinars, TA clinics, and conference sessions also address these topics. Additional training topics are included in the funding opportunity announcement applicable to each funded RHY program. Orientation for new hires, including the number of hours and training topics addressed, must be documented in each staff member's file. Additional training must be offered on an annual basis and likewise documented.

83. Does each required training topic need to be covered individually, or is there one module that covers all relevant topics for on-boarding purposes?

Training is offered in a variety of ways to include self-directed participation in eLearning, individual coaching, facilitated webinars, group trainings, as well as local, state, regional, and national training opportunities. Grantees have flexibility in how training requirements are addressed, as long as the completion of training requirements is documented.

84. Does each member of my staff need to complete an application to the eLearning site, or can that be done in bulk or perhaps set up with one agency-wide login?

All eLearning participants must register individually, which requires a login on the RHYTTAC site and a profile to register for future events. Once a registration has been approved, the registrant will receive a confirmation e-mail and be able to enroll in courses.

E-Learning accounts cannot be set up with one agency-wide login, as only those with individual accounts will be able to print a certificate of completion. Individual accounts also allow participants to track completed courses, and the system will provide access to a transcript for documentation. Those with individual accounts are also able to stop and re-start a course, should they need to, by clicking “save and exit.” Doing this will allow users to return to the saved location the next time they log into the system. Users can exit a course as many times as they need without having to start the course over from the beginning, as long as they remember to “save and exit” when leaving the course.