Housing Vouchers for Young People After Foster Care Exits: How-To Guide for Public Child Welfare Agencies

Working with Housing Partners to Successfully Administer FUP and FYI Vouchers for Youth/Young Adults

OVERVIEW

CSH estimates that there are approximately 90,000 families and youth in need of supportive housing, including over 12,000 young people exiting child welfare and/or juvenile justice systems. Black, Indigenous, and Latinx families and youth are disproportionately represented within these numbers. Access to safe and stable housing is important for preparing youth to transition to adulthood.

Housing vouchers are the primary housing resources for supporting these youth with their long-term stability goals. While child welfare agencies do not need to become experts on vouchers, this how-to guide will provide Public Child Welfare Agencies (PCWA) with information on how to collaborate with Public Housing Authorities (PHA) to apply for and administer two primary federal housing voucher resources designed to assist young people exiting foster care and in need of housing: the Family Unification Program (FUP) and Foster Youth to Independence Initiative. Also included are best practices and lessons learned from other jurisdictions that have successfully partnered to administer FUP and/or FYI. Those unfamiliar with FUP and FYI may benefit from first reading *How Federal Housing Vouchers Create Pathways of Stability for Young People Exiting Foster Care* to gain a better understanding of the basic concepts and approach to these federal housing vouchers for youth. For information about federal housing vouchers for families with child welfare involvement, see Child Welfare Family Housing Voucher Briefs.



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FUP VOUCHER APPLICATION AND PROGRAM REQUIREMENTS

PHA and PCWA Partnerships

Only PHAs that administer Housing Choice Vouchers (HCV) are eligible to apply to HUD for FUP and FYI vouchers. To qualify for FUP and FYI, a PHA must have a formal partnership agreement with a PCWA, typically established through a Memorandum of Understanding (MOU) and signed during the application period. Other partners can be included as parties to the MOU, such as a local Continuum of Care (CoC). The CoC's may help to identify CoC-funded services available for young people and help identify eligible youth who may no longer be involved in child welfare services but have come to the attention of the homeless system. While multiple agencies may enter the MOU together, the PHA and PCWA carry most of the responsibility for developing and administering the FUP and/or FYI program. The process to formalize a partnership can be initiated by a PCWA or PHA.

Funding awards of FUP-Youth and FYI housing vouchers are made available by HUD in several different ways. Each new funding round may include additional changes to the requirements and process.

Competitive Awards:

FUP/FYI vouchers are made available periodically through a Notice of Funding Opportunity (NOFO) from the U.S. Department of Housing and Urban Development (HUD). HUD notifies PHAs as funding becomes available and posts updates on available funding on their website. If you are unsure if your jurisdiction currently has or has received vouchers in the past, HUD maintains a list of all jurisdictions with FUP/FYI voucher awards and their contact information. That information can be found here:

- FUP Awards All Years
- FYI Competitive Awards
- PHA Contact Information

Non-Competitive Awards:

A limited number of FYI vouchers can also be drawn down by local Public Housing Agencies (PHAs) partnering with child welfare agencies to assist youth on an "as-needed" rolling basis through a noncompetitive process. This noncompetitive process provides opportunities for eligible youth nationally to receive rental assistance when required, not just those who reside in localities that have recently received funding through a national competition.

A PHA cannot request FYI non-competitive vouchers from HUD until the following conditions are met:

- Executed MOU or letters of intent documenting the required elements of the partnership agreement between the PHA, PCWA and any other relevant partners.
- PHA receives a referral of an eligible youth from the PCWA.

FYI non-competitive vouchers are contingent on HUD having continued available funding. Using HUD's online request form, an eligible PHA can request as few as one voucher, with the number of vouchers that a PHA may access through the noncompetitive process capped at 25, however, PHAs that utilize more than 90 percent of their existing FYI vouchers can request an additional allocation. No PHA may receive more than 50 noncompetitive FYI vouchers in a fiscal year. PHAs with large numbers of eligible youth are encouraged to apply for rental assistance through HUD FUP and FYI competitive processes.

With limited exceptions, PHAs that currently administer FUP and/or FYI vouchers are not eligible to receive FYI vouchers through the noncompetitive process unless they have achieved certain voucher utilization rates determined by HUD. For example, a PHA with 11 or more FUP and/or FYI vouchers may request additional FYI vouchers if they have at least a 90 percent utilization rate for their existing combined pool of FYI and/or FUP vouchers. PHAs with no more than 10 FUP and/or FYI vouchers must achieve at least a 50 percent utilization rate for their existing combined pool of vouchers in order to request additional FYI vouchers. One exception is that the utilization rate calculation can be adjusted by HUD upon request of a PHA that has formally identified FUP and/or FYI vouchers as project-based vouchers. Another exception that a PHA can request that HUD adjust their utilization rate to account for FUP/FYI vouchers that have been issued to a youth/family who is currently searching but not yet leased up in a housing unit. Additional details, templates and links can be found on the HUD FYI webpage.

Required and Optional MOU and Program Components

HUD requires a formal agreement between the PHA and PCWA that must address several aspects of the partnership including a statement of cooperation, shared goals and standards for administering the program, outlining roles and responsibilities, addressing how youth will be assisted in finding housing, and types of services provided for youth. In addition, HUD "strongly encourages [the] involvement of State, local, philanthropic, faith-based organizations, Continuum of Care (CoC) or designated CoC recipient". Additional partners can be instrumental in improving FUP-Youth/FYI programs.

HUD has provided template MOUs that can be used by both new applicants and existing FUP/FYI partnerships. The templates can be found here:

- HUD Sample FUP Memorandum of Understanding
- HUD Sample FYI Memorandum of Understanding

Required and Optional Components of the FUP/FYI Programs

The following chart highlights some key required and optional components as outlined in recent FUP and FYI NOFOs and guidance from HUD. Generally, these elements must be documented in the MOU, including identifying which partner(s) organization is responsible. Always refer to the most current FUP and/or FYI information from HUD.

Element	Required	Encouraged/Optional
Partnership	Commitment to coordinate between PCWA and PHA	Previous coordination between PHA, PCWA, and CoC
Goals and Standards	PHA and PCWA's goals and standards of success for	
	administering the program	
Staffing	Identifying staffing positions at the PHA, PCWA, and CoC	
	who will serve and FUP/FYI liaisons	
Roles and	How the PHA, PCWA, and any partners will fulfill their	
Responsibilities	respective roles and responsibilities	
Housing Search	Assist youth to locate housing	Assist youth to access housing in low-poverty census
	Work with landlords to secure appropriate housing units	tracts
Post Move Counseling	Provide counseling on subsequent moves	
	Provide landlord/tenant mediation	
Supportive Services	Provide financial resources to facilitate voucher	
	utilization and move-in	
	Provide case management with regular contact including	
	an assessment of all youth needs, provide/make referrals	
	to needed services	
Self Sufficiency		Targeted FUP/FYI enrollment into active/planned Family
		Self-Sufficiency Program or similar program

Roles and Responsibilities

The following chart summarizes many important PCWA and PHA roles and responsibilities for securing and implementing FUP-Youth and FYI. Generally, these should be documented in the required MOU, along with any FUP-Family roles/responsibilities, the roles for additional optional partners that are included as parties to the agreement, such as the Continuum of Care and/or others providing support and connecting youth to housing resources that they may be eligible for.

PHA Roles and Responsibilities	PCWA Roles and Responsibilities
MOU or letter of intent signatory, applicant for FUP and FYI vouchers,	MOU or letter of intent signatory, commitment to partner with PHA
and commitment to administer all awarded FUP and FYI vouchers and	in administering FUP and/or FYI.
maintain voucher utilization rate of at least 90%.	
Amend administrative plan and processes for FUP/FYI program	Provide assessment of anticipated need for vouchers over the next 12
requirements, and train PCWA and partner staff on HCV program.	months with PHA, and train PHA and partner staff on relevant work
	of PCWA as it relates to FUP-eligible youth.
Develop FUP/FYI goals and standards of success; Develop data and	Develop FUP/FYI goals and standards of success.
metrics for tracking/improvements.	
Designate FUP liaison staff.	Designate FUP liaison staff.
Conduct regular meetings with PCWA and other partners.	Participate in regular meetings with PHA and other partners.
Refer youth on HCV waiting list that may qualify for FUP to PCWA for	Implement system to identify eligible youth on PCWA caseload those
consideration/review.	referred from PHA and other relevant partners and prioritize based
	on level of need and appropriateness of FUP/FYI to match their need.
Accept referrals of youth certified eligible from PCWA, determine	Refer/certify an eligible and prioritized youth (or family, as applicable)
HCV eligibility, place on HCV waiting list and assist per PHA admission	to PHA within 30 days of notification of an available FUP/FYI voucher.
policies. An otherwise closed PHA HCV waiting list can be opened	
exclusively for FUP/FYI referrals.	
Document that youth are informed that are able to receive	Provide or secure required supportive services, and any additional
supportive services during program participation, and as applicable,	services and support for youth, for the 36-month duration of their
provide access to FSS or similar program and any optional services	program participation.
and supports for youth.	
Voucher administration - tenant briefing, issuance, unit quality	
inspection and approval, landlord contracts/payments, examinations	
of family income/composition, rent calculations	

Eligibility Criteria

For a young person to be found eligible to be referred to the PHA to receive FUP-Youth/FYI assistance, the PCWA must certify that they meet **ALL** of the following requirements:

- 1. Has attained at least 18 years and not more than 24 years of age;
- 2. 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^v at age 16 or older; and
- 3. Is homeless or at risk of becoming homeless.

A young person who meets the above requirements and is expectant and/or parenting is also eligible. If there is an open child welfare case on behalf of one or more children in the household, the young person and their household may also be eligible for a FUP-Family housing voucher. (more information in FUP Family <u>briefs</u>)

Once a young person is referred to the PHA, their eligibility for a HCV will be determined.

Income Requirements

The PCWA is responsible for identifying and referring eligible young people to the PHA, and then the PHA determines if they meet their HUD-approved criteria to receive a HCV as well as income requirements. Annually HUD produces information on area median incomes (AMI) across the country and the maximum income a household can have based on their size to qualify for a voucher. For FUP-Youth/FYI, household income must not exceed 50% of the AMI. However, 75% of all vouchers must be given to families and individuals who are considered extremely low income at or below 30% of the AMI. HUD income limits for all states and counties can be here:

HUD Income Limits

OPERATIONAL GUIDANCE

Historical challenges related to FUP and FYI range from limited access to supportive services, especially for needs that extend beyond child welfare independent living services, finding affordable units and landlords, and getting vouchers to intended young people at the earliest point possible to maximize impact during the transition from foster care. For both new and experienced organizations addressing housing, the following guidance, strategies and examples provide valuable insights.

For jurisdictions with long histories with FUP, it may be welcome news that there have been several federal actions and regulatory improvements to the FUP program, including the FYI initiative focused on expanding timely access to housing resources for FUP eligible youth^{vi}. Most significant is the Fostering Stable Housing Opportunities Act and subsequent amendments and implementation notices^{vii}. Recent FUP and FYI funding notices^{viii} and guidance from HUD include enhancements to requirements that better align with emergent practices, research, and lessons from the field after more than two decades of practice with federal youth housing vouchers^{ix}. Most program enhancements apply to FUP/FYI vouchers from past awards as well as newly awarded vouchers.

Maintaining Strong Partnerships

Successfully embedding housing vouchers in the services array for youth transitioning from foster care requires strong partnerships, effective multi-agency teamwork and leadership support. These elements must create the necessary conditions for staff at multiple levels to navigate within and across systems. This suggests the need for system-level partnerships that address specific staff roles and aligned practices to contain costs and streamline programs.

Invested state and local partners, including young people who have experienced homelessness and their allies, may be critical to ensuring necessary support is in place for the PHA and child welfare agency to develop an MOU and apply for FUP Youth and/or FYI vouchers. PCWA data, including information gleaned from National Youth in Transition Survey responses, and documentation from the homeless service sector showing the prevalence of youth who enter homeless programs each year after exiting care can be coupled with the voices of young people to lend urgency for the need to act.

Education and advocacy may be necessary to ensure both PCWA and PHAs are invested and fully aware of the need for the FYI vouchers, the strategies and support that can help improve youths' lease up rates, potential support of other local allies and service providers in meeting program goals, and the potential positive impact for youth. The voices of those with lived experience and their allies can also be instrumental in bringing other needed partners to the planning table, including housing providers, to ensure youth have fair access to housing opportunities and to overcome discriminatory housing practices.

PCWA have found success with the following strategies while engaging a PHA in partnership:

- Make the case for the need for youth housing, including the anticipated number of FUP eligible referrals over the course of a
 year, demonstrated using data.
- Find alignment between existing goals, missions and values when creating FUP goals, success standards and metrics.
- Explore how housing stability will help PCWA to support youth to participate/benefit from services, and how services can support housing stability and voucher utilization that is important to a PHA.
- Discuss opportunity to clarify roles, streamline processes and refine policies to reduce barriers, redundancies, and staff burden.
- Identify FUP and FYI as opportunities to increase the local supply of vouchers, and benefit from a corresponding increase in HUD funding to a PHA for voucher administration.

Tips to prepare for a future FUP-Youth/FYI funding application or enhance existing partnerships:

- Establish and/or further develop partnerships between PCWA, PHA, CoC and others in advance of an application or reinvigorate an existing partnership. Meet regularly using a team approach where partners cross train, clarify roles and problem solve.
- Convene senior leaders from PCWA, PHA and other partners initially at key points along the way to maintain support and alignment.
- Review prior or current funding notices and frequently asked questions resources. As relevant, review and address NOFO
 Rating factors to both maximize competitiveness of an application and to support successful implementation and voucher
 utilization.
- Include young people with lived experience related to child welfare and housing instability early in the process. This can greatly benefit the development of a stronger MOU and application. Those with lived experience should be part of the planning at the start and throughout the process to ensure that appropriate needs are being met. Including youth who have experienced homelessness or housing instability after exiting foster care, and those who have benefited from housing vouchers during their transition from care, can provide the expertise PCWA and PHAs require to ensure that a youth housing voucher program is as impactful as possible.
- Meet regularly using a team approach where partners cross-train, clarify roles, monitor and problem solve to improve quality
 of the housing program. Convene senior leaders from PCWA, PHA and other state, tribe, local and community-based partners
 initially at key points along the way to maintain support and alignment. Interested parties can help ensure the services offered

- are attuned to the needs and goals of youth and improve the quality of services offered. Regularly convening invested stakeholders to discuss program implementation can facilitate the identification of program challenges and allow for practice adaptations to emerge that addresses those challenges, ultimately resulting in better outcomes for youth and improved voucher utilization rates. Identify and collaborate with complimentary initiatives, such as Youth Homelessness Demonstration Project efforts^x.
- Focus on implicit biases in budgetary, programmatic, and policy decisions. Include young people with lived experience at the table to co-design services and supports that will address their needs. This helps ensure successful development and implementation of FUP-Youth/FYI programs. PHA and PCWA should utilize data disaggregated by race alongside qualitative data from young people with lived experience to better understand and address racial disparities and other inequities. PHA and PCWA should use this data to develop concrete actions to advance racial equity and ensure that specific cultural and identity needs are met through the development and implementation of FUP partnerships. Regular monitoring of program outcomes can also determine whether resources are being used equitably and having equitable impacts, allowing for readjustment when such benchmarks are not being met.

Identification of Eligible Youth/Young Adults

A PCWA is responsible to systematically identify and refer eligible families and youth within their caseload to available FUP and FYI resources. The PCWA workforce often has limited understanding of housing, coupled with broad and complex mandates and competing requirements. There are approaches to improve identification of eligible young people during and after their involvement with the PCWA, including:

- Ensure that assessments and transition planning protocols within the PCWA include questions about housing plans, and are looking at contingency planning in case other housing plans fail to materialize in time for a smooth transition.
- Leverage PCWA contacts with current and former foster youth, such as through administration of the <u>National Youth in Transition Database</u> survey, as a means to engage young people that may be FUP-Youth/FYI eligible and require housing assistance.
- Use cross sector data to help identify, understand, and respond to youth housing needs through enhanced data collection, data sharing partnerships and analysis, including disaggregating by race and other critical factors. The use of administrative data is critical to understanding the full scope of housing issues and the needs of young people across systems that provide services and supports. Linking data from the PCWA Information System and Homeless Management Information Systems will

- help identify young people who may be eligible and who would benefit from housing and services support. In many cases, creating a data-sharing agreement between partners can help to set up parameters and protocols that protect participant privacy under applicable laws.
- Engage community partners and the CoC to create avenues for eligible young people to be identified and referred to the PCWA for consideration. Partners can assist in the identification of eligible youth, particularly those who may have already exited foster care and are seeking emergency shelter or other assistance from homeless service providers. Homeless service systems may ask questions at coordinated entry or intake to screen for youth who may be eligible for an FYI voucher. Case managers working with young adults may find through their own assessment that the youth is likely eligible for FUP Youth/FYI rental assistance. The quick identification of eligible youth, including young parents, facing homelessness can both prevent and greatly diminish the length of homeless episodes and help eligible young people to access the help they need to secure and maintain housing. A HUD FYI One Page resource may be useful in reaching eligible young people.

Prioritization and Referral System

The PCWA is responsible for establishing and implementing a system to refer eligible and prioritized young people to the PHA for available FUP-Youth/FYI vouchers. When utilized strategically and collaboratively FUP provides unique opportunities to target rental assistance to specific young people in a way that can enhance outcomes related to equity and thriving and help public systems and communities to better address their mandates and requirements.

Per a HUD FYI MOU Template in PIH Notice 2023-04 (HUD):

Given the limited number of FYI vouchers, the PCWA is required to consider how they are prioritizing youth for referrals. The intent of prioritization should be to ensure that youth are prioritized for housing resources and related services based upon level of need and appropriateness of the intervention. For youth still involved in the child welfare system, the permanency goals of the young person should be taken into account. Prioritization must be designed in a way that is consistent with fair housing and civil rights requirements. PCWAs are reminded that any prioritization process must not discriminate based on race, color, religion, sex (including sexual orientation and gender identity), disability, familial status, or national origin. The prioritization process must also be consistent with HUD's Equal Access requirements.

Considerations for developing prioritization criteria:

- Structure the system so that prioritization is assessed in relation to an available housing voucher. Consider who is most need or highest priority to get the maximum value from this housing resource right now? Often a young person that is in need now is highly motivated, has connections and support. Consider how these factors might support a successful voucher utilization.
- Adopt "housing first" principles which rest on the premise of housing stability as foundational to building pathways for youth success and thriving futures.
- Consider timing of assistance, including opportunities to support the young person in leveraging and maximizing other opportunities such as extended foster care and independent living programs while they are in care that can then be followed by at least 36 months of FUP/FYI housing assistance as a means to extend support for their housing with aligned services and supports throughout the periods of later adolescence and early adulthood, providing more time for development of independent living skills, stability, healing, education, career pathways, etc.
- Consider opportunities to prevent experiences of homelessness by working with PCWA, PHA and partners such as a CoC to create and streamline referral and voucher issuance pathways that are feasible for a young person to secure housing by end of their time in extended foster care, especially in tight housing markets.
- Prioritization factors should encompass young people who are preparing for transition from foster care without any identified housing opportunities, those who may have identified housing options/goals in their transition plan that fail to materialize or may disrupt after exit, and those who already exited and fell into homelessness.
- If a youth fails to use a FUP Youth/FYI voucher issued on their behalf, the PHA can offer it to another eligible youth.

State and County Examples

In 2021, Both the State of New Jersey (NJ) and Los Angeles (LA) County, CA created new entities within their respective PCWAs to coordinate housing related resources and partnerships for both families with children with child welfare involvement and young people exiting foster care/extended foster care, including housing voucher resources such as FUP and FYI. These entities are able to translate and liaison between housing and child welfare, collaboratively use data to monitor progress and support continuous improvement. For additional information, visit:

- NJ Department of Children and Families -Office of Housing
- <u>LA County Department of Children and Family</u>
 Services Supportive Housing Division

Strategies:

- Involve partners including those with lived experience in developing prioritization and a referral system that centers the experiences, strengths and needs of youth people and maximizes opportunities to prevent and end youth homelessness. Encourage and flexibly support youth voice and choice.
- Create designated staff as housing liaisons or offices/teams within PCWA to manage partnerships, understand and maintain attention on housing and child welfare, confirm eligibility based on the target population, and conduct an assessment process to support prioritization for and matching to FUP-Youth/FYI and other potential housing resources. Some jurisdictions use case conferencing or housing panel processes.
- Leverage PCWA staff FUP liaison to manage and maintain the system of identification and referral.
- PCWA and PHAs are encouraged to partner with others such as the CoC for the local homelessness response system as they may be able to assist in identifying youth with child welfare histories and housing needs through their coordinated entry process, and connecting these young people to the PCWA for verification and potential referral to FUP-Youth/FYI.

Ideally with increasing movement and focus upstream in child welfare towards family preservation/prevention, coupled with increased voucher resources and a strategic, multi-agency prioritization and referral approach, there will be fewer young people aging out of foster care, and fewer still that exit without housing resources and support.

Access and Navigation Assistance

Understanding and navigating the PHA admission and housing voucher leasing processes and required documentation can be overwhelming, especially for young people during and after a transition from foster care.

Strategies:

- Offer support for young person in understanding and completing required paperwork and collecting documentation.
- Work with PHA and partners to educate on required documentation and identify potential alternative documentation. Quality programs ensure that young adults are given ample resources to understand the full set of rights and responsibilities which may include guides on how to read a lease, case management meetings to review leases, or peer-to-peer consultation
- Create agreements across government agencies to streamline access to required documents and verifications.
- PCWA workers and independent living staff proactively help youth to collect and secure vital documents early in anticipation of future referral and voucher issuance, and help young people safely and securely store their documents.

- Provide additional support and navigation through the admission and leasing processes. Staff should walk through the lease agreement with a young person to ensure there is a full understanding of its terms^{xi}.
- Help young people develop a housing resume with housing history, explanations and strengths.

Challenging Histories/Backgrounds

FUP-Youth/FYI eligible young people commonly face hurdles and biases related to aspects of their histories that prevent or delay voucher issuance or housing access. Factors often relate to either a lack of rental or credit history or past eviction, legal or financial challenges, substance misuse or incarceration histories identified through background checks. Young people may even discover that they have been victims of identity theft.

Common factors and mitigating strategies include:

- PHA policies more stringent than HUD required minimum.
 - PCWA and PHA can review and discuss opportunities for PHA to reduce barriers. Partners can comment during PHA
 Administration Plan update process to elevate barriers and learnings from those with lived experience, how housing
 vouchers have helped child welfare impacted populations and supported youth strengths.
- PCWA misunderstanding PHA policies and processes. Staff may not be clear about policies, and may not be aware of potential opportunities to address challenging policies and denials.
 - PHA can review Administrative Plan with PCWA, including sections regarding background histories to ensure mutual understanding.
 - PCWA can proactively help young people prepare documentation (what has changed, circumstances, documentation to counter, etc.) to mitigate the chance of denials.
 - Even if denied, the PCWA can educate and support a youth about their right to appeal. PCWA can work with PHA to identify explanations and documentation to assist in overturning an initial denial.
- Landlords have stringent background requirements that preclude many young people from housing.
 - Educate, offer housing resume, support youth in advocacy focusing on strengths, explaining circumstances and making landlord assurances. There should be a comprehensive, written eviction prevention policy that details how all FUP/FYI housing partners work together to promote housing stability.
- Youth have outstanding balances related to housing or utilities that must be resolved before landlord or utility approval.
 - o Provide financial supports for past rent or utility balances, and for move in, security and utility deposits

- Educate, offer housing resume, support youth in advocacy focus on strengths, explaining circumstances and making landlord assurances talking points, practice sessions with young person, go with them.
- Youth have outstanding balances related to housing or utilities that must be resolved before landlord or utility approval.
 - o Provide financial supports for past rent or utility balances, and for move in, security and utility deposits.
 - o If this is the result of identity theft, provide or refer to assistance to report/dispute.

A subset of young people that may be eligible for FUP/FYI are considered Dual System Youth, due to their histories with both child welfare and juvenile justice involvement. Many jurisdictions have policies related to records sealing or expungement, or other exclusions for juvenile offenses. Additional polices and practice resources can be found here: Homelessness and Juvenile Justice (Coalition for Juvenile Justice).

Additional criminal background and tenant screening resources:

- Emerging Practices in Inclusive Tenant Screening CSH
- Background Screening Process: Template and Guidance CSH
- Background Screenings: Frequently Asked Questions CSH
- Memo on Criminal Records HUD

Securing a Housing Unit

Young people face additional challenges in using housing vouchers, especially where housing supply is limited and costs are high. While rental market conditions can fluctuate, limited availability of rental units has been an increasingly challenging issue, with estimates identifying a shortage of millions of affordable homes nationwide. While addressing this shortage will require long term efforts, we know that young people cannot wait until housing supply catches up with demand. Young people with experiences of foster care frequently report facing discrimination and landlord bias due to their age, race, source of income and other factors. In addition, transitioning from foster care and those experiencing a housing crisis may find the process of navigating the housing market to be daunting, confusing and overwhelming. Yet there are strategies that can improve utilization of FUP-youth/FYI vouchers.

Common factors and strategies include:

- Lack of available rental units within HUD approved PHA payment and subsidy standards^{xii}, which are the maximum rent amount and approved max bedroom size based on family/household composition. (related to Fair Market Rent)^{xiii}
 - Review with PHA, identify landlords where other HCV have been used successfully. Consider if PHA might need to explore a request to make an exception to the payment standards.
 - o PCWA, PHA and partners can explore if feasible to project-base a portion of FUP and certain awards of FYI vouchers, meaning vouchers would be attached to a specific unit set aside for the FUP-Youth population.
 - o PHA and PCWA can work together with young people as partners to identify/elevate needs, barriers, opportunities faced by youth voucher holders to developers of affordable and supportive housing. This may include a need for more youth-oriented units and relevant amenities.
- Youth unable to successfully secure a housing unit.
 - Provide housing navigation supports directly or through a partner who will engage and assist young people in <u>preparation</u>, housing search, landlord outreach, negotiation, and moving in.
 - o Incorporate strategies to help youth secure a unit in a low poverty area, such as neighborhood tours, unit viewings, or landlord introductions.
 - o Consider engaging young people with relevant lived expertise to serve as peer housing navigators.
 - Engage, educate, and partner with landlords to create and maintain housing availability for voucher holders, create landlord incentives and elevate the role of supportive services as an additional support and assurance.

Many homelessness service providers have developed deep expertise in helping youth, adults, and families with housing navigation and landlord mediation support. Many have spent years cultivating relationships with landlords that trust they will provide the follow-up support that allows those who recently experienced homelessness to achieve stability. Rather than build this expertise independently, child welfare agencies can leverage the relationships and expertise already present in the homeless and housing service system. These potential partners may be able to provide re-housing support to youth aging out of care under contract with the child welfare agency. They may also be recruited to share lessons learned with those directly responsible for delivering such assistance for youth receiving FUP-Youth/FYI rental assistance.

Ensuring Adequate and Appropriate Supportive Services and Supports

Youth must be offered an array of services and support throughout their participation in FUP Youth/FYI. The requirements for making services available have increased over time, especially as multiple evaluations, learning from the field and youth voice have elevated the critical importance of services access.

- Supportive services for youth are delivered or secured from partners by the PCWA and are intended to help youth access housing, achieve housing stability, and meet their own educational and employment goals. Each HUD funding notice describes the supportive services that are required to be provided or secured for young people during their participation with FUP-Youth/FYI. Generally, supportive services requirements for FUP-Youth and FYI include: Basic life skills information/counseling on money management, use of credit, housekeeping, proper nutrition/meal preparation, and access to health care (e.g., doctors, medication, and mental and behavioral health services).
- Counseling on compliance with rental lease requirements and with HCV program participant requirements, including assistance/referrals for assistance on security deposits, utility hook-up fees, and utility deposits.
- Providing such assurances to owners of rental property as are reasonable and necessary to assist a FYI-eligible youth to rent a unit with a voucher.
- Job preparation and attainment counseling (where to look/how to apply, dress, grooming, relationships with supervisory personnel).
- Educational and career advancement counseling regarding attainment of general equivalency diploma (GED); attendance/financing of education at a technical school, trade school or college; including successful work ethic and attitude models.

Common categories of services array for young people:

- Housing case management, services coordination, tenancy supports, concrete resources/supports
- Financial Direct cash assistance, banking, savings, public benefits access, and other economic supports
- Health and Behavioral Health, clinical/treatment services
- Independent living skills
- Career Pathways education, employment
- Social, cultural, spiritual, community building

Services Approach and Considerations:

- Who provides services and how matters to young people. Partner with young people initially and ongoing to design and develop services array, and consider roles for peers and alumni as staff and service providers^{xiv}.
- While services participation is optional for the youth, the onus is on the service providers to engage young people initially and ongoing. Learn and apply principles of assertive engagement, harm reduction, positive youth development, housing first.
- Help create a developmentally appropriate safety net for youth as they experiment, learn and grow. Practice assertive engagement, housing first, harm reduction, flexible and adaptive approaches. Avoid paternalistic, coercive, putative and restrictive policies and approaches.
- Be careful about how services and goals are sequenced, recognizing that one size does not fit all. Consider certain services and
 age/eligibility parameters and encourage strategic alignment as appropriate. Allow for youth to lead, have space and support
 for healing, stabilizing and building towards health and well-being. Foster pathways that prepare youth for long term thriving
 and economic security, and avoid undue pressure restricted by shorter term thinking (i.e. preparing for career living wage vs.
 poverty wage job that prevents skill/trade/educational attainment).
- Ensure strong tenancy supports, anticipate and help mediate^{xv} landlord/tenant issues. Integrate strategies to mitigate damage, rent arrears and repayment negotiation, utility issues, establish communication protocols and frequency, contacts, etc.
- Consider how to support young people as they may desire to safely navigate and nurture ties to their families and other important social connections; connect them with or explore culturally/spiritually/developmentally oriented resources/series.

Not all young people have the same needs, and subsets of FUP/FYI youth may meet sets of eligibility criteria for specific services and supports. Partners with expertise in youth development, employment and workforce development, and housing navigation can augment the supports that child welfare agencies can deliver to ensure youth have the robust support they deserve and may require to thrive. Multiple partners may be engaged to provide support specific to a young person's needs. As an example, a Temporary Assistance to Needy Families (TANF) agency may agree to provide workforce development support and other services to young mothers exiting care and a nonprofit supporting LGBTQIA+ youth may be contracted to offer services tailored to needs of a subpopulation at particularly high risk of homelessness after exiting foster care.

Tips to accomplish this:

- Identify and map what you have, and what is needed. Scan existing resources and identify non-traditional partners to enhance
 FUP/FYI supportive services offerings. Providing Support Services for Youth in Transition Child Welfare Information Gateway
- Put youth in the center and orient to what is convenient and effective for them, not what is most convenient and efficient for
 partner agencies. Trust when young people say what they need and how they need it.
- Break through siloes create aligned or integrated approach with creativity/innovation, braiding/aligning to create flex funds for services. Think of FUP/FYI not as separate programs but instead as a housing subsidy resource to pair more holistically within a broader wraparound service array, or as a part of a supportive housing model. This can allow for public and private partners to leverage and reorient existing mainstream and community resources to provide holistic wraparound, flexible services to match youth and community needs and goals.

Considerations:

- What other resources do we have in our community? Are there community assets that young people access and trust? Who else has an interest and/or is serving youth/young adults? How could we braid or blend across multiple funding streams to create access to services? Might we link with a collaborative or multi-sector initiative that is missing the housing component?
- How can we ensure equitable and timely access to appropriate services that match with youth needs so that FUP/FYI participation doesn't set up for failure?

Examples of <u>potential funding resources</u> and partners to explore for building out an array of youth/young adults services/supports include:

- John H. Chafee Foster Care Program for Successful Transition to Adulthood (HHS)
- Behavioral Health SAMSHA block grants/funding for mental health/substance misuse
- Health <u>Medicaid</u>, <u>Federally Qualified Health Centers</u>, Managed Care Entities
- Higher Education access and support for <u>students transitioning from foster care</u>
- Office of Juvenile Justice and Delinquency Prevention grants Youth Mentoring, Supporting Vulnerable At-Risk Youth and Youth Transitioning Out of Foster Care, Tribal Youth Initiatives

- Runaway and Homeless Youth Programs, Community Action Agencies, LGBTQIA+ community centers and youth providers, and other community services, faith based, peer and BIPoC led organizations
- Other Federal such as <u>CoC</u>, <u>SNAP</u>, CSBG, CDBG, SSBG, Indian Housing Block Grant, Workforce
- State/local funding, Private Philanthropy, United Way, etc.
- Resident services when project-basing vouchers, leverage onsite <u>resident services</u> <u>coordination</u> for youth
- For expectant/parenting young people, as <u>Temporary Aid to Needy Families (HHS)</u>, <u>Maternal and Child Health Early Childhood (MCHVIE)- Home Visiting</u>, <u>Head Start</u>, <u>Family Treatment</u> and <u>Early Childhood</u> Courts, <u>Family Resource Centers</u>, <u>Community Schools</u>, <u>Child Care</u>, and <u>Child Welfare</u> such as Title VI-E Family First Prevention Services; CAPTA; Title VI-B Child Welfare Services, Promoting Safe and Stable Families, Regional Partnership Grants

During the COVID-19 pandemic, the California Department of Social Services administered a FYI Funding Pilot Program providing \$4 million of CHAFEE Emergency COVID Funding to help counties/tribes provide supportive services for youth with FYI vouchers.

Family Self-Sufficiency Program

In addition, to the range of supportive services that are to be offered throughout the period the youth is receiving rental assistance, youth receiving FUP Youth/FYI rental assistance are strongly encouraged to participate in <u>Family Self-Sufficiency</u> (FSS) programs if the PHA offers the program and a slot is available.

Youth are not required to participate in supportive services to receive the rental assistance, however nonparticipation in an FSS program if available would make a youth ineligible for an extension of rental assistance beyond 36 months unless the youth is exempt from participation.

Requirements to Receive an Extension Beyond 36 Months: At 36 and 48 months, youth are assessed to determine eligibility for a 12-month extension of rental assistance. Youth eligible for a 12-month extension at each assessment include youth who:

- Participated in a FSS or a Moving to Work self-sufficiency program^{xvi};
- Youth unable to enroll in FSS program but who engaged in an educational or workforce development program or was employed in 9 of the preceding 12 months; and

• Youth who are exempt from participation. This includes youth who are caring for a dependent child under age 6 or an incapacitated adult; youth engaged in drug or alcohol treatment and rehabilitation; and youth who are incapable of participating in FSS or educational, workforce development or employment activities due to a medical condition.

HUD does not provide a threshold or number of hours as to what constitutes youths' engagement in education, employment, or workforce development activities nor do they detail documentation requirements. Such requirements can be defined by the individual PHA, but HUD encourages PHAs to offer extensions to the broadest number of youth possible while remaining compliant with regulations.

After 36 months on rental assistance, youth who are offered an opportunity to engage in an FSS program may do so. They may also become eligible for an additional housing voucher extension by participating in education, employment, or workforce development activities in 9 of the preceding 12 months or if they are exempt from participation.

Because youth cannot access FSS without first successfully leasing up a housing unit with a FUP voucher, the success of FUP-FSS depends both on FUP program improvements and on FSS program improvements. A <u>FUP – FSS demonstration for youth</u>xvii was conducted and the resulting evaluation included important lessons that can be applied to ongoing FUP – FSS alignment efforts xviii, including:

- PHAs should be actively encouraged to build partnerships with landlords or management companies to promote the acceptance of FUP youth as tenants. This approach may include offering incentives, such as covering rent while landlords bring units up to Housing Quality Standards, or building reputational capital by accepting community responsibility for FUP youth.
- Programs should have a dedicated FSS program coordinator who serves all the FUP-FSS youth. Sites that have all youth reporting to the same FSS program coordinator are more engaged in the program and find that youth are better meeting their goals. This approach ensures that the one FSS program coordinator can better learn about youth needs and determine what adaptations in the administration of the program will allow the site to better serve its youth participants.
- PCWAs should provide training to FSS program coordinators on the needs of youth leaving foster care. PCWAs are most familiar
 with this population of youth, and they understand their needs and the strategies and trauma-informed approaches needed
 to work with them most effectively.
- The PHA should be responsible for ensuring that the FSS program coordinator attends voucher briefings and follows up with youth after they lease up.

YOUTH ENGAGEMENT APPROACH

Young adult involvement in their housing and services is a crucial element to a successful housing program serving young adults.

Strategies:

- Incorporate a positive youth development approach throughout.
- Center young people as critical partners in the work
- Support and make room for their leadership development, build trust and create environments of 'Safe to Try/Safe to Fail/Safe to Learn.'
- Recognize impacts of trauma and systems involvement, and stages of adolescent development and emerging adulthood transitions
- Set realistic expectations for progress, offer grace and ensure support, time and space to heal and grow.
- Integrate restorative practices.

Helpful youth engagement resources include:

- Core Components for Authentic Youth Engagement Identified Chapin Hall
- Youth Collaboration Toolkit True Colors United
- Inclusion Toolkit True Colors United
- State Youth Advocacy/Advisory Boards & Foster Care Alumni Associations Child Welfare Information Gateway

SHARED HOUSING

Young people may seek to use their FUP/FYI voucher for a shared housing situation. This is allowable by HUD and each local PHA and jurisdiction may have specific policies that apply. Each FUP/FYI recipient roommate entering a shared housing situation will require a separate lease and agreement between the landlord and PHA. For example, if two young people rent a 2-bedroom apartment, each tenant will need to enter their own separate lease agreement. While shared housing can be a supportive option for young people who may not have lived on their own previously, tensions and challenges can arise. For example, one roommate could violate their lease or move from the unit prematurely.

In shared housing situations, consider that additional preparation, support, and mediation may be important services. In addition, explore with young people to identify their specific needs and proactively conduct contingency planning for inevitable challenges, tensions, and conflicts.

ADDRESSING COMMON MYTHS

Several misconceptions have been identified within PCWA and PHA partnerships working with FUP and FYI housing vouchers. Operating under false assumptions can add unnecessary complexity and barriers. The following chart addresses and counters many of the more common 'myths'.

MYTH	RESPONSE
PCWA must send referrals for all FUP eligible youth (and	A PCWA has up to 30 days to refer a FUP-eligible youth (or family) once notified by PHA of an available FUP or FYI voucher. This is an example of a promising practice: child welfare organizations can identify the
families) to PHA as soon as identified.	housing needs of youth on an ongoing basis, but only refer the prioritized youth (or family) to the PHA when a voucher is available. This helps prevent applicants from ending up on a lengthy PHA waiting list, which can reduce the impact of a voucher. With lengthy waiting lists, a youth could become ineligible or fall outside of the intended prioritization criteria for the population. In addition, PHA and PCWA should have regular communication between identified liaisons and a clear process in place to alert of anticipated voucher openings. When there are anticipated openings, PCWA should identify and refer based on their established prioritization criteria rather than referring primarily based on the length of time a person has been on an internal 'waiting list.' If the PHA is eligible, request additional FYI non-competitive vouchers for youth who would otherwise be awaiting housing.
For youth still in foster care/extended foster care, preparation of a potential FUP/FYI referral cannot begin with a young person until 90 days of foster care exit.	A PCWA cannot submit a referral to the PHA for a FUP or FYI until 90 days from foster care exit per the transition plan, however housing planning, gathering required documentation, etc. can began long before this so that if necessary, a referral can be made at the 90 day mark. Given how long it can take for a voucher to be issued and search/secure a unit, it is important to plan ahead to avoid a housing gap after foster care exit. Consider concurrent housing goals/strategies, including referrals and voucher issuance for FUP/FYI in the
	event that it is needed. If not needed, the voucher can be issued to another youth.
FUP and FYI vouchers cannot be used to provide project- based rental assistance	FUP and FYI housing vouchers are awarded and most commonly deployed as <u>tenant-based</u> HCV assistance where a young person uses their issued voucher to secure an approved unit from the housing market. That said, PHAs with qualifying circumstances may seek to utilize a portion of their awarded FUP Youth and FYI vouchers awarded to each PHA for <u>project-based assistance</u> ^{xxi} . Changes made through Housing Opportunities

	Through Modernization Act ^{xxiii} and the subsequent Fostering Stable Housing Opportunities Act and it's amendments ^{xxiii} allow PHAs to project base existing or newly awarded FUP/FYI housing vouchers and exceed typical limits on the percentage of overall HCV that can be project based. Vouchers awarded under FYI Notice PIH 2019-20 are prohibited from being project-based ^{xxiv} .
Only single, unaccompanied young people can access FUP-Youth/FYI housing vouchers	For FUP Youth/FYI, the young person may be a single, unaccompanied individual, or the youth may have additional household members, especially as young people begin to form families and may be expectant/parenting and/or have a partner.
When children of a parenting youth are placed into foster care, the PHA can/should require the PCWA to verify the timeframe for when reunification will occur and reduce voucher size for households with temporarily absent children if reunification does not occur in specific time frame.	For FUP-Youth/FYI where a removal occurs during participation, the household would continue to include the temporarily absent child(ren) in foster care as long as reunification remained a case goal. Federal law and regulations are set up to ensure that children temporarily placed in foster care are still counted as part of the household. PHA should not set time limits for how long a child(ren) in this situation can be absent from the household before unit size/family composition are to be reduced, or time limits for when reunification must occur. The PCWA can confirm that reunification remains a case goal. PHA should not have child welfare case details/specifics in PHA files. Federal statute, 42 U.S.C. 1437a, states (C) ABSENCE OF CHILDREN. —The temporary absence of a child from the home due to placement in foster care shall not be considered in determining family composition and family size. This federal requirement applies to federally funded housing assistance programs, including but not limited to FUP, FYI and HCV. Many PHAs may not be aware of or fully understand this requirement. PHA usually requires parents to relocate when the number of household members changes. PHA may be sensitive to not housing a family in a larger unit which impacts resources available to serve others yet given the specific dynamics at play with child welfare
	involvement, families' unit size is not to be reduced while reunification remains a possibility.

MOVING ON – TRANSITIONS BEYOND FUP YOUTH/FYI

FUP-Youth and FYI housing vouchers are limited to 36 months of rental assistance, with potential for extending up to a maximum of 60 months, as described above, for young people participating in FSS and meeting eligibility. Preparing a young adult to move on can begin before a youth leases up in housing by thoughtfully reviewing voucher time frames, introducing the concept of moving on from FUP/FYI, discussing normal development and life stages, and reinforcing that the young person will have access to support from service providers that can assist them in assessing progress toward their goals and increasing independence. Introducing these concepts at the outset can reinforce the opportunity and skill building nature of supportive services that complement their housing voucher and prepare them for future housing stability.

This planning may include supporting pathways to a living way career that can sustain market rate housing, however some young people may continue to require rental assistance upon moving on from FUP/FYI. Young people may apply for other affordable or supportive housing waiting lists. Some PHAs include a preference category for young people exiting FUP-Youth/FYI within their HCV Administrative Plan waiting list policies. Additional resources can be found in the CSH Moving On toolkit.

CONCLUSION

The availability of FUP Youth and FYI rental assistance can greatly reduce the number of youth who become homeless after exiting care and help eligible young people who have already become homeless (including parenting youth) reconnect to housing and stability quickly. Every PCWA should work with the PHA(s) and other partners in their jurisdiction to leverage these critical resources to support young people and ensure successful transitions from care.

STEPS YOU CAN TAKE

- 1. PCWA can connect with PHA(s) in their jurisdiction to explore underutilized and/or untapped FUP/FYI housing voucher resources to support young people, discuss current opportunities, needs, and constraints faced by each sector and young people.
- 2. PCWA, PHA, CoC along with other public sector and community-based agencies can share and analyze data to understand population and system needs and impact and to inform continuous improvements.
- 3. PCWA, PHA and CoC can identify and connect with potential partners that may be able to play a role in identifying young people, connecting youth with housing, and/or offering appropriate services/supports to apply for and stabilize in housing.

- 4. PCWA, PHA, young people and other partners can advocate for additional investments in young people highly impacted by foster care experiences by sharing data and stories to elevate unmet needs, progress, and opportunities.
- 5. PCWA, PHA, CoC, and other parents can convene/partner with young people to design, deliver, and identify process, operational, and policy improvements to maximize impact of FUP/FYI housing and related services. Review existing programs to address common myths and incorporate recent federal changes to FUP/FYI outlined in this brief to make it easier for young people to access and benefit from these important resources.
- 6. PCWA can support the workforce to proactively consider housing needs and prepare for potential referrals to housing vouchers early in planning with youth for their transitions upon exit from foster care/extended foster care.

What have you tried that has been successful? What lessons about child welfare and housing partnership do you have that might benefit the larger community of practitioners? What are other challenges to utilizing FUP, FYI and/or other housing tools? Send a note with your questions or examples to 1Roof@csh.org. CSH and partners such as Casey Family Programs and the National Alliance to End Homelessness look forward to sharing emerging lessons and innovative strategies with the broader child welfare and housing field.

ABOUT CSH

The Corporation for Supportive Housing (CSH) is the national champion for supportive housing, demonstrating its potential to improve the lives of very vulnerable individuals and families by helping communities create more than 385,000 real homes for people who desperately need them. CSH funding, expertise and advocacy have provided \$1.5 billion in direct loans and grants for supportive housing across the country. Building on 30 years of success developing multiple and cross-sector partnerships, CSH engages broader systems to fully invest in solutions that drive equity, help people thrive, and harness data to generate concrete and sustainable results. By aligning affordable housing with services and other sectors, CSH helps communities move away from crisis, optimize their public resources, and ensure a better future for everyone. Visit us at www.csh.org.

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RESOURCES

- Child Welfare and Housing Resource Hub (One Roof)
- FYI Initiative Webinar Series (HUD)
- <u>Diverting Foster Youth from Homelessness (National Alliance to End Homelessness)</u>
- Foster Youth to Independence (FYI) Voucher Program (National Alliance to End Homelessness)
- National Center on Housing and Child Welfare
- Resources for Youth Homelessness (HUD)
- National Clearinghouse on Homeless Youth and Families (HHS)
- <u>Creating Equitable Ecosystems of Belonging and Opportunity for Youth (Annie E. Casey Foundation)</u>
- The Family Unification Program: A Housing Resource for Youth Aging Out of Foster Care Report (HUD)

Featured Resource

The Office of Housing within the New Jersey (NJ) Department of Children and Families (DCF), NJ Department of Community Affairs (DCA), and CSH have partnered for many years working together to develop a young adult supportive housing program, Connect to Home (CTH), that adapts to the needs of the population. Programs like CTH offer a crucial intervention that serves young adults as they are leaving foster care and before they experience homelessness and become underserved. Through early implementation of Connect to Home, CSH and DCF gathered resources, consulted with peers across the country, and learned from the experience of building a program specifically for young adults. While not FUP/FYI specific CTC leverages federal housing vouchers. Connecting Young Adults to Home: A Resource Guide for Supportive Housing Providers Working with Young Adults outlines concepts that can be used to create or refine programs that align housing with supportive services for young adults.

ⁱ Supportive Housing Need in the United States (CSH)

ⁱⁱ Racial Disparities and Disproportionality Index (CSH)

[&]quot;HUD publishes all information on available funding at https://www.hud.gov/grants.

^{iv} Notice PIH 2023-04 - Foster Youth to Independence Initiative (HUD)

^v Social Security Act §475

vi Preventing Homelessness for Youth and Young Families in Foster Care: FY2021 Updates (National Alliance to End Homelessness) and Positive Changes in FY2021: Universal FUP Vouchers for Youth Aging Out of Foster Care (National Alliance to End Homelessness)

vii Federal Register: Implementation of the Fostering Stable Housing Opportunities Amendments

viii Recent examples: FY2022 FUP NOFO and FY2022 FYI Competitive NOFO

ix Changes to HUD Programs Could Help Prevent Housing Instability among Youth Who've Aged Out of Foster Care (Urban Institute)

^{*} Evaluation of the HUD Youth Homelessness Demonstration Program Final Report (HUD)

^{xi} Model tool to help guide this process: https://endhomelessness.org/resource/rapid-re-housing-toolkit/3-9-leaseexplanation-tool

^{xii} 24 CFR Part 982 Subpart I -- Dwelling Unit: Housing Quality Standards, Subsidy Standards, Inspection and Maintenance

xiii Fair Market Rents (HUD)

xiv Peer Support and Medicaid (Casey Family Programs)

xv Getting Landlords and Tenants to Talk (Urban Institute)

xvi MTW Self-Sufficiency Program (HUD)

xvii PIH Notice 2016-01 FUP and FSS Demonstration (HUD)

xviii Family Unification Program Family Self Sufficiency (FUP-FSS) Demonstration Evaluation (HUD)

xix FYI Questions and Answers: Foster Youth to Independence (FYI) Initiative (HUD)

^{**} Use of Shared Housing in the Housing Choice Voucher (HCV) Program (HUD)

xxi 24CFR Part 983 Project-Based Voucher Program

xxii HOTMA Resources (HUD)

xxiii Federal Register: Implementation of the Fostering Stable Housing Opportunities Amendments

xxiv PIH Notice 2019-20 - Tenant Protection Vouchers for FYI Initiative (HUD)