



OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

July 17, 2020

Ms. Tamera Kohler
Regional Task Force on the Homeless
4699 Murphy Canyon Road
San Diego, CA 92123-4372

Dear Ms. Kohler:

This is in response to the Regional Task Force on the Homeless' (RTFH) request for approval to operate special activities in its FY 2017 YHDP projects: CA1815Y9D011700, CA1816Y9D011700, CA1817Y9D011700, CA1818Y9D011700.

While the CoC Interim Rule at 24 CFR 578 limits certain activities, Section II.C.3 of the FY 2017 YHDP NOFA allows YHDP projects to operate special activities with approval from HUD. HUD determines that RTFH detailed good cause to operate their YHDP projects under the following special activities:

- 24 CFR 578.37(a)(1)(ii)(C) – Rapid Rehousing (RRH) projects must limit rental assistance to no more than 24 months to a household.
 - Approved alternative requirement determination – Rental assistance can be provided up to 36 months to a household for RRH portion of the Joint Transition Housing-RRH. The recipient may provide up to 36 months of rapid rehousing rental assistance to a program participant if the recipient demonstrates (1) the method it will use to determine which youth need rental assistance beyond 24 months and (2) the services and resources that will be offered to ensure youth are able to sustain their housing at the end of the 36 months of assistance. The total amount of time a participant can receive rental assistance in the CA1816Y9D011700 project cannot exceed 36 months
- 24 CFR 578.37(a)(1)(ii)(D) – Projects can provide supportive services for no longer than 6 months after rental assistance stops.
 - Approved alternative requirement determination – Participants can be provided up to 12 months of supportive services after rental assistance stops for project CA1816Y9D011700.
- 24 CFR 578.3 and 24 CFR 578.51(l)(1) – Requires participants receiving rental assistance to enter into a lease agreement for a term of at least one year.
 - Approved alternative requirement determination – Participants receiving rental assistance can enter into an initial lease of less than one year but more than one month for project CA1816Y9D011700.

- 24 CFR 578.53(e) – Lists eligible costs for supportive services:
 - Approved alternative requirement determination—In addition to the eligible costs listed, RTFH is approved to bill the following services as eligible supportive services costs:
 - Payment of utility arrears of up to six months per service for project CA1816Y9D011700.
 - Payment of rental arrears consisting of a one-time payment for up to six months of rent in arrears, including any late fees on those arrears for project CA1816Y9D011700.
 - The one-time cost of purchasing a cellular phone and basic cellular plan for program participant use, provided that access to a cellular phone is necessary to obtain or maintain housing for projects CA1815Y9D011700, CA1816Y9D011700, CA1817Y9D011700, CA1818Y9D011700.

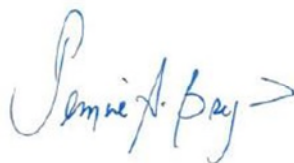
The following alternative requirement requests are **not** approved:

- 24 CFR 578.37(a)(1)(ii)(E) – Requires rapid rehousing projects to re-evaluate, not less than once annually, that the program participant lacks sufficient resources and support networks necessary to retain housing.
 - Alternative requirement determination – All YHDP RRH projects must follow the re-evaluation requirements as stated in 24 CFR 578.37(a)(1)(ii)(E).

These determinations apply to this YHDP project and if the project renews under the Continuum of Care program without significant changes.

If you have questions regarding this determination, please contact Nili Soni, Division Director, SNAPS/State Assistance Division at Nili.Soni@hud.gov or 202-402-2973.

Sincerely,



Jemine A. Bryon
Deputy Assistant Secretary
for Special Needs