

Department of Health and Human Services  
**Office of Inspector General**



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January 2026 | A-06-23-07001

# **ACF Can Improve Services to Homeless Youth by Strengthening Grant Recipients' Compliance With Transitional Living Program Requirements**



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## ACF Can Improve Services to Homeless Youth By Strengthening Grant Recipients' Compliance With Transitional Living Program Requirements

### Why OIG Did This Audit

- Youth affected by homelessness are vulnerable to exploitation and victimization, have high rates of involvement in the juvenile justice system, and are more likely to engage in substance use.
- The Transitional Living Program (TLP), administered by ACF, awards grants to public and private organizations (grant recipients) to provide temporary living arrangements and services to homeless youth aged 16 to 21.
- In Federal fiscal year 2022, ACF awarded over \$53 million to TLP grant recipients to help youth transition from homelessness to self-sufficiency. We conducted this audit to determine whether TLP grant recipients provided services to homeless youth in accordance with Federal requirements.

### What OIG Found

The 25 TLP grant recipients in our sample did not provide or did not document that they provided all required services in accordance with Federal requirements for 107 of the 123 homeless youth in our sample.

- On the basis of our sample results, we estimated that TLP grant recipients did not provide or did not document that they provided all required transitional living services to 3,538, or 88 percent, of homeless youth in the TLP.
- TLP grant recipients that provided maternity related services did not create a separate case file for the child or infant for 12 of 21 homeless youth that were parents.

### What OIG Recommends

We made four recommendations to ACF to create guidance and provide technical assistance for TLP grant recipients, including creating guidance and technical assistance for documenting required services in homeless youth case files. The full recommendations are in the report.

ACF concurred with all four recommendations.

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## INTRODUCTION

### WHY WE DID THIS AUDIT

Youth affected by homelessness are vulnerable to exploitation and victimization, have high rates of involvement in the juvenile justice system, and are more likely to engage in substance use. The Transitional Living Program (TLP), authorized by the 1988 Amendment to the Juvenile Justice and Delinquency Prevention Act of 1974, is administered by the Family and Youth Services Bureau (FYSB) of the Administration for Children and Families (ACF). ACF awards TLP grants to public and private organizations (grant recipients) to provide temporary living arrangements and services to homeless youth aged 16 to 21. In Federal fiscal year 2022, ACF awarded over \$53 million to TLP grant recipients, to help youth transition from homelessness to self-sufficiency.

### OBJECTIVE

Our objective was to determine whether TLP grant recipients provided services to homeless youth in accordance with Federal requirements.

### BACKGROUND

#### Transitional Living Program

The TLP assists young people in making a successful transition from homelessness to independent living by addressing their immediate needs and preparing them for long-term self-sufficiency. TLP grant recipients must provide shelter (e.g., apartments, host family homes, or congregate care) for up to 540 days with certain exceptions.<sup>1</sup>

TLP grant recipients must also provide case management that includes an individualized service plan, based on an assessment of a youth's needs, to ensure access to appropriate care services.<sup>2</sup> These services should include social services, educational services, vocational training, child welfare services, legal services, mental and physical health care, and access to law enforcement and anti-trafficking agencies. TLP grant recipients must also provide each youth basic life skills training that includes money management, budgeting, consumer education, use of credit, interpersonal skills, educational advancement, and job attainment. For youth with children or infants, TLP grant recipients provide maternity related services and training related to parenting skills, childcare, and child nutrition. TLP grant recipients must also develop and implement an aftercare plan to ensure the youths' ongoing safety for at least 3 months after the youth has exited from the program.

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<sup>1</sup> Under 34 U.S.C. § 11222(a), grant recipients must provide shelter and case management services for a continuous period not to exceed 540 days, or 635 days in exceptional circumstances.

<sup>2</sup> Throughout this report, all mentions of "youth" refer to homeless youth.

## HOW WE CONDUCTED THIS AUDIT

Our nationwide audit covered 220 TLP grants awarded to 175 TLP grant recipients that provided shelter and services to homeless youth and, if applicable, to their children or infants. These TLP grant recipients had an active grant award from October 1, 2021, through September 30, 2022 (audit period), and provided shelter and services during the grant's project period, which may have been before or after the audit period.<sup>3</sup>

Because ACF did not have a list of all homeless youth who received services from TLP grant recipients during our audit period, we employed a multi-stage sample design. We requested a list of all TLP grant awards for recipients in operation during the audit period from ACF. The list identified 220 TLP grant awards. Our multi-stage random sample consisted of two stages:

- For the first stage of our sample, we randomly selected 25 of the 220 TLP grant awards.
- For the second stage of our sample, we randomly selected for review up to 5 homeless youth who received shelter and services from the TLP grant recipients associated with the 25 selected TLP grant awards during the grant's project period, for a total of 123 selected homeless youth.<sup>4</sup>

We reviewed the case files for the selected youth and, if applicable, their children or infants, to determine whether the required shelter and services were provided during the TLP project period. If at least one required service was not provided or documented as provided, and there was not adequate justification as to why the homeless youth did not receive the service, we considered the TLP grant recipient to have not provided TLP services to the homeless youth in accordance with Federal requirements.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix A describes our audit scope and methodology, Appendix B contains our Statistical Sampling Methodology, Appendix C contains our sample results and estimates, and Appendix D contains the Federal requirements.

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<sup>3</sup> Project period is defined as the total time for which Federal support has been programmatically approved, as shown in the Notice of Grant Award.

<sup>4</sup> If a TLP grant recipient associated with the selected TLP grant award serviced five or fewer homeless youth, then we reviewed all homeless youth serviced by the TLP grant recipient.

## FINDINGS

The TLP grant recipients associated with the 25 selected TLP grant awards did not provide or document that they provided all required services to sampled homeless youth in accordance with Federal requirements. For 107 of the 123 sampled homeless youth, there was no evidence that the TLP grant recipient provided all required services for the youth. On the basis of our sample results, we estimated that TLP grant recipients associated with the TLP grant awards in the sampling frame did not provide or document that they provided all required services to homeless youth in accordance with Federal requirements for 3,538, or 88 percent, of homeless youth in the TLP.

The TLP grant recipients associated with the selected TLP grant awards did not provide or document that they provided shelter, individualized service or treatment plans, and basic life skills training for sampled homeless youth. Some of the TLP grant recipients did not ensure or document that all sampled homeless youth had a safe and appropriate exit from the TLP, did not provide an aftercare plan, and did not document they maintained contact with sampled homeless youth after exiting the TLP. In addition, some TLP grant recipients did not create separate case files or maintain required documents in the case files for the children or infants of parenting youth.

ACF stated that it provided training and technical assistance but left it up to TLP grant recipients to determine how the provision of services was documented. TLP grant recipients confirmed that ACF did not have a standardized policy or provide clear instructions on how to document services in the homeless youths' case files. Moreover, TLP grant recipient officials stated that they were not aware of the requirement to create a separate case file for children or infants of homeless youth and that staff turnover also contributed to services not being documented in homeless youth case files.

Because the TLP grant recipients did not provide or document they provided required housing and services, the health and safety of the homeless youth may be at risk. Moreover, the core goal of the TLP, to build resilience and prepare homeless youth for lasting independence, may not have been achieved.

### **TRANSITIONAL LIVING PROGRAM GRANT RECIPIENTS DID NOT PROVIDE OR DOCUMENT THAT THEY PROVIDED REQUIRED SERVICES TO HOMELESS YOUTH**

TLP grant recipients must develop a written individualized service or treatment plan to identify and assess the needs of youth and, as appropriate, arrange, coordinate, monitor, evaluate, and advocate for a package of services to meet the specific needs of the youth.<sup>5</sup>

TLP grant recipients did not provide or document that they provided services to 107 of the 123 homeless youth in our sample in accordance with Federal requirements. On the basis of our sample results, we estimated that TLP grant recipients associated with the TLP grant awards in

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<sup>5</sup> 34 U.S.C. §§ 11222(a)(6) and (7); 45 CFR §§ 1351.1 and 1351.25.

the sampling frame did not provide or document that they provided services to 3,538, or 88 percent of, homeless youth in the TLP.

Table 1 shows the results of our audit of the case files for the sample of 123 homeless youth.

**Table 1: Summary of Case File Documentation Deficiencies**

Required Service	Service Not Documented	Service Not Provided
Shelter Provided	2	5
Individualized Service or Treatment (IST) Plan Created	9	1
Services or Referrals Provided Based on the IST Plan	9	0
Basic Life Skills Information Provided	91	0
Infant/Toddler Case File Contained Required Documentation*	17	0
Safe and Appropriate Exit	16	0
Aftercare Plan Created	47	7
Contact Maintained With Youth for at Least 3 Months After Exit	51	0

\*During the case file review, we determined that of the 123 homeless youth in our sample, 21 had 1 or more children, for a total of 25 children or infants.

### **Grant Recipients Did Not Provide Shelter or Document That They Provided Shelter**

TLP grant recipients are required to provide shelter by grant, agreement, or contract.<sup>6</sup> TLP grant recipients must have an arrangement with an age-appropriate emergency shelter in circumstances in which there are no current TLP openings.<sup>7</sup>

We found that one TLP grant recipient did not provide shelter to five homeless youth in our sample. Two additional TLP grant recipients did not document providing shelter for one homeless youth each in our sample.

According to a TLP grant recipient program official, the five homeless youth could not be accommodated in the TLP grant recipient’s shelter because its shelter was at capacity, and therefore the youth resided with family members or friends. An ACF official stated that TLP grant recipients are not allowed the flexibility to not provide shelter. The living arrangements outside of the TLP grant recipient’s shelters were evidenced in the youths’ case files.

<sup>6</sup> 34 U.S.C. § 11222.

<sup>7</sup> Funding Opportunity Announcement HHS-2021-ACF-ACYF-CX-1905.

According to a program official for one of the TLP grant recipients that did not document providing shelter, case file documents could not be located because of turnover in a key employee position.

Another TLP grant recipient was unable to provide support for the youth receiving shelter because the grant recipient’s transitional living program had ended, and TLP grant recipient staff were unable to locate the relevant documentation.

### **Grant Recipients Did Not Create or Document Individualized Service or Treatment Plans and Did Not Document Referrals**

TLP grant recipients must ensure that youth have access to all available resources, including adult mainstream services and youth services. In addition, TLP grant recipients must have a suitable referral plan based on an assessment of youth needs to ensure that appropriate system-of-care services are accessible. The system-of-care services must include referral for social services, law enforcement, educational services, vocational training, welfare, legal services, anti-trafficking agencies, health care programs, including health insurance options, and affordable child care or child education programs, or both.<sup>8</sup>

We found that one TLP grant recipient did not create an individualized service or treatment plan for one homeless youth in our sample. We also found that four TLP grant recipients did not document an individualized service or treatment plan for nine homeless youth in our sample.

In addition, we found that five TLP grant recipients did not document that they provided services or provided referrals for services to nine sampled youth identified in the individualized service or treatment plan. See the example below.

<b>Example: Services or Referrals Not Documented</b>	One of the five TLP grant recipients did not document that one youth received direct assistance or referral to the appropriate educational services identified in the youth’s individualized service or treatment plan.
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### **Grant Recipients Did Not Document That They Provided Required Basic Life Skills**

TLP grant recipients must have a plan or curricula that inform every young person, either by group or individual setting, the fundamentals of basic life-skills, including money management; budgeting; consumer education; use of credit; interpersonal skill-building; educational advancement; job attainment skills; healthy relationships; mental and physical health care; individual or group counseling, or both; parent or child counseling, or both; recreation; and

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<sup>8</sup> Funding Opportunity Announcement HHS-2017-ACF-ACYF-CX-1233.

leisure activities.<sup>9</sup> Grant award recipients must retain all records and supporting documents for a period of 3 years after the final Federal Financial Report submission or longer if an audit or litigation is ongoing.<sup>10, 11</sup>

During our audit, we found that 23 TLP grant recipients did not document that they provided all required basic life skills to 91 homeless youth in our sample. See the examples below.

<b>Example: Case Files Could Not Be Located</b>	One TLP grant recipient was unable to locate case files for all five sampled homeless youth. TLP grant recipient program officials stated that they were unable to locate documents to support that all required basic life skills were provided because they were not involved with the TLP grant recipient's program before its closure.
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<b>Example: Documents Could Not Be Located</b>	For another grant recipient, a program official stated that due to employee turnover, they were unable to locate resident binders containing documents that supported that all required basic life skills were provided to the five sampled homeless youth.
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<b>Example: Data Could Not Be Retrieved</b>	For another grant recipient, program officials stated that, for four of the five sampled homeless youth, archived data could not be retrieved after an upgrade to the recipient's database system, and that hard copies of the life skills curriculum were destroyed.
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### **Grant Recipients With Parenting Youth Did Not Maintain Required Documents for Each Child or Infant**

TLP grant recipients providing maternity related services must maintain required documents for the youth and each infant or child. At a minimum, information contained in the infant's or child's file should include a record of well-care visits, sensory and developmental screenings, and assessments.<sup>12</sup>

During our case file reviews, we determined that 7 TLP grant recipients provided services to 21 sampled homeless youth who had a total of 25 children or infants. All 7 TLP grant recipients did

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<sup>9</sup> Funding Opportunity Announcement HHS-2017-ACF-ACYF-CX-1233.

<sup>10</sup> A Federal Financial Report is a statement of expenditures associated with a grant award. Grant recipients must submit a final Federal Financial Report after the grant project period end date.

<sup>11</sup> 45 CFR § 75.361.

<sup>12</sup> Funding Opportunity Announcement HHS-2021-ACF-ACYF-CX-1905.

not document the required services for 19 children or infants of 17 sampled homeless youth. See the examples below.

<b>Example: Grant Recipient Was Unaware of the Requirement</b>	One TLP grant recipient program official stated that the recipient was unaware of the requirement to maintain documentation for services provided to the six children of its four sampled parenting homeless youth.
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<b>Example: Insufficient Documentation</b>	For another TLP grant recipient, a program official stated that the recipient did not keep extensive documentation on the services provided to the two children of the two sampled parenting homeless youth enrolled in the TLP grant recipient's program.
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### **Grant Recipients Did Not Ensure That Homeless Youth Had a Safe and Appropriate Exit From Transitional Living Programs**

TLP grant recipients must ensure that youth have safe and appropriate exits when leaving the program. A safe and appropriate exit means placing youth in settings that reflect achievement of the intended purposes of the transitional living programs.<sup>13</sup> Examples of safe and appropriate exits are exits: (1) to the private residence of a parent, guardian, another adult relative, or another adult who has the youth's best interest in mind and can provide a stable arrangement; (2) to another residential program if the youth's transition to the other residential program is consistent with the youth's needs; or (3) to independent living if consistent with the youth's needs and abilities. Examples of inappropriate exits are exits: (1) to the street, (2) to a locked correctional institute or detention center if the youth became involved in activities that led to this exit after entering the program, (3) to another residential program if the youth's transition to the other residential program is inconsistent with the youth's needs, or (4) to an unknown or unspecified other living situation.<sup>14</sup> Each TLP grant recipient must report data on the type of exit experienced by each youth departing a transitional living program.<sup>15</sup>

During our audit, we found that 10 TLP grant recipients did not ensure or document that 16 homeless youth in our sample had a safe and appropriate exit from its program. Of the 16 youth, 8 exited their TLP involuntarily. See the examples on the following page.

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<sup>13</sup> The purpose of Runaway and Homeless Youth 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 (45 CFR § 1351.10).

<sup>14</sup> 45 CFR § 1351.1. Significant Terms.

<sup>15</sup> 45 CFR § 1351.31(e).

**Example:  
Involuntary Exit**

For one TLP grant recipient, a sampled homeless youth involuntarily exited from the program due to lack of participation in case management, life skills training, and maintaining employment.

**Example:  
Exit Without  
Notification and  
Discharge From the  
Program**

For another TLP grant recipient, one sampled homeless youth exited its transitional living program after 1 month without notifying staff, and another youth was discharged from the program due to an altercation with staff.

**Example:  
Insufficient  
Documentation**

Additionally, a TLP grant recipient was unable to provide sufficient documentation to confirm whether the five homeless youth in our sample had a safe and appropriate program exit. TLP grant recipient officials stated that their TLP grant had been closed for a few years and current staff was not able to locate documentation.

### **Grant Recipients Did Not Create or Document an Aftercare Plan**

TLP grant recipients must develop and implement an aftercare plan, covering at least 3 months, to stay in contact with youth who leave the program to ensure their ongoing safety and access to services. A youth's individual aftercare plan must outline what services were and will be provided, as well as the youth's housing status during and after the program. The plan must be provided to the youth in exit counseling or before.<sup>16</sup>

During our audit, we found that 2 TLP grant recipients did not create an aftercare plan for 7 homeless youth in our sample, and 15 TLP grant recipients did not document an aftercare plan for 47 of the homeless youth in our sample before exiting the TLP. See the examples below.

**Example:  
No Plan Created  
Because the Youth  
Opted Out**

One TLP grant recipient program official stated that an aftercare plan was not created for four sampled youth because the youth opted out of participating in aftercare services.

**Example:  
Grant Recipient Was  
Unaware of  
Requirement**

Another TLP grant recipient program official stated that it was not aware aftercare planning information needed to be created for three sampled youth until after an ACF monitoring visit.

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<sup>16</sup> 45 CFR § 1351.26(a).

### **Grant Recipients Did Not Document That They Maintained Contact With Homeless Youth After the Youth Exited Transitional Living Programs**

TLP grant recipients must develop and implement an aftercare plan, covering at least 3 months, to stay in contact with youth who leave the program to ensure their ongoing safety and access to services.<sup>17</sup>

During our review, we found that 18 TLP grant recipients did not document that they maintained contact with 51 of the homeless youth in our sample for at least 3 months after exiting the program.

### **Grant Recipients Stated That Services Were Not Provided or Were Not Documented as Provided Because They Did Not Understand or Were Unaware of Requirements and Had Staff Turnover**

TLP grant recipients associated with the selected TLP grant awards did not provide or document required services because, according to the TLP grant recipients, ACF did not provide clear or standardized instructions for documenting services in homeless youth case files. Moreover, TLP grant recipient officials stated that they were not aware of the requirement to create a separate case file for all children or infants of homeless youth and that staff turnover also contributed to services not being documented in homeless youth case files.

Because the TLP grant recipients did not provide or document that they provided required housing and services, the health and safety of the homeless youth may be at risk. Moreover, the core goal of the TLP, to build resilience and prepare homeless youth for lasting independence, may not have been achieved.

### **GRANT RECIPIENTS PROVIDING MATERNITY RELATED SERVICES DID NOT CREATE A SEPARATE CASE FILE FOR THE CHILDREN OR INFANTS OF HOMELESS YOUTH**

TLP grant recipients providing maternity related services must create a separate file for the youth and each youth's child or infant. At a minimum, information contained in the file should include a record of well-care visits, sensory and developmental screenings, and assessments.<sup>18</sup>

Of the TLP grant recipients associated with the TLP grant awards in our sample, 7 provided services to 21 homeless youth who had children or infants. We found that 5 of the TLP grant recipients did not create a separate case file for 14 children or infants of 12 sampled parenting youth.

Some TLP grant recipients providing maternity related services were not aware of the requirement to create a separate file for a homeless youth's child or infant. Because separate case files were not created, we were unable to determine whether the youths' children or

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<sup>17</sup> Funding Opportunity Announcement HHS-2017-ACF-ACYF-CX-1233.

<sup>18</sup> Funding Opportunity Announcement HHS-2021-ACF-ACYF-CX-1905.

infants received the well-care visits, sensory and developmental screenings, and assessments necessary for their care and development.

## **RECOMMENDATIONS**

We recommend that the Administration for Children and Families create guidance and provide technical assistance for TLP grant recipients related to:

- documenting required services in homeless youth case files,
- documenting required services in homeless youth case files that allows for continuity even when employees change jobs,
- ensuring required services are provided, and
- maintaining separate case files for children or infants of parenting youth.

## **ADMINISTRATION FOR CHILDREN AND FAMILIES COMMENTS**

In written comments on our draft report, ACF concurred with our recommendations and described actions it has taken and plans to take to address them.

In response to our first recommendation, ACF stated that it provides training and technical assistance to grant recipients to communicate and reinforce program requirements. ACF stated that it will redistribute the Runaway and Homeless Youth (RHY) Program's Frequently Asked Questions document to grant recipients to reinforce the requirement for maintaining documentation that clearly describes the nature of services provided. In addition, Federal Project Officers (FPOs) will continue to highlight the critical importance of documentation during monthly calls with grant recipients and in preparation for on-site monitoring visits.

In response to our second recommendation, ACF stated that the RHY Program provides guidance documents, tip sheets, and training resources through an eLearning platform and during new grant recipient orientation, national training, and program specific training. ACF also stated that it is developing a guidance document to address documentation standards for services provided to youth and will disseminate that document to grant recipients.

In response to our third recommendation, ACF stated that, during on-site monitoring visits, FPOs verify compliance with the RHY Act, RHY Final Rule, and published Notice of Funding Opportunity requirements. ACF stated that the RHY program is currently developing a training webinar for grant recipients focused on effective case management strategies.

In response to our fourth recommendation, ACF stated that FYSB will reinforce the requirement to maintain separate case files for homeless youth and their children through training, technical assistance, and guidance to ensure accuracy, accountability, and continuity of care.

ACF's comments are included in their entirety as Appendix E.

## **APPENDIX A: AUDIT SCOPE AND METHODOLOGY**

### **SCOPE**

Our nationwide audit covered 220 TLP grants awarded to 175 TLP grant recipients that provided shelter and services to homeless youth, and if applicable, to their child or infant. These TLP grant recipients had an active grant award from October 1, 2021, through September 30, 2022 (audit period), and provided shelter and services during the project period, which may have been before or after the audit period.

We used a multi-stage random sample for this audit:

- For the first stage of our sample, we randomly selected 25 of the 220 TLP grant awards.
- For the second stage of our sample, we randomly selected for review up to 5 homeless youth who received shelter and services from the TLP grant recipient associated with the 25 selected TLP grant awards during the grant's project period, for a total of 123 selected homeless youth. We obtained and reviewed case file information such as shelter, individualized service or treatment plans, aftercare plans, provision of basic life skills, and services provided to a youth's child or infant.

We limited our assessment of ACF's internal controls to those relating to the provision of TLP shelter and services and ACF's monitoring of TLP grant recipients. Specifically, we interviewed ACF officials, reviewed ACF's policies and procedures, and surveyed TLP grant recipients through questionnaires.

We performed our audit work from July 2023 through September 2025.

### **METHODOLOGY**

To accomplish our objective, we:

- reviewed applicable Federal laws and regulations;
- obtained and reviewed ACF's policies and procedures for the provision and oversight of TLP shelter and services;
- interviewed officials at ACF to gain an understanding of their oversight of the provision of TLP shelter and services;
- interviewed TLP grant recipients to gain an understanding of their administration of TLP shelter and services;
- surveyed TLP grant recipients through questionnaires to identify challenges in their administration of TLP shelter or services;

- requested a listing of TLP grant awards from ACF and identified 220 active TLP grant awards during our audit period of October 1, 2021, through September 30, 2022, and randomly selected 25 TLP grant awards from this listing;
- obtained a listing of homeless youth from the TLP grant recipients associated with the 25 randomly selected TLP grant awards and randomly selected up to 5 homeless youth from each TLP grant recipient to determine whether shelter and other required services were furnished to homeless youth in accordance with Federal requirements;
- reviewed case files for the 123 homeless youth in our sample and, for each homeless youth case file, if at least one required service was not provided or documented as provided and there was not adequate justification as to why, considered the TLP grant recipient to have not provided TLP services to the homeless youth in accordance with Federal requirements;
- estimated the number and percentage of homeless youth in the sampling frame who did not receive, or did not have documentation of receiving, the required TLP shelter or services in accordance with Federal requirements; and
- discussed the results of our audit with ACF officials.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## **APPENDIX B: STATISTICAL SAMPLING METHODOLOGY**

### **SAMPLING FRAME**

Because ACF did not have a list of all homeless youth who received services from TLP grant recipients during our audit period, we employed a multi-stage sample design. We requested a list of all TLP grant awards for recipients in operation during the audit period from ACF.<sup>19</sup> The resulting sampling frame consisted of 220 TLP grant awards. After randomly selecting 25 TLP grant awards, we requested from each of the associated TLP grant recipients a list of all homeless youth who received TLP services. See the TLP grant recipients associated with the 25 randomly selected TLP grant awards and the number of homeless youth randomly selected for review in Table 2.

### **SAMPLE UNIT**

The primary sample unit was a TLP grant award that covered the period of October 1, 2021, through September 30, 2022.

The secondary sample unit was a homeless youth who received TLP services from a TLP grant recipient associated with the selected TLP grant award during the grant's project period which may have been before, during, or after the audit period.

### **SAMPLE DESIGN AND SAMPLE SIZE**

We used a multi-stage sample design. First, we randomly selected 25 TLP grant awards as our primary sample units. Next, we randomly selected up to five homeless youth (secondary sample units) who received shelter and services from the TLP grant recipients associated with the 25 selected TLP grant awards during the grant's project period. If a selected TLP grant recipient associated with a selected TLP grant award serviced five or fewer homeless youth, then we reviewed all homeless youth serviced by the TLP grant recipient. As a result of the multi-stage selection process, we randomly selected for review a total of 123 homeless youth. (See Table 2 on the following page.)

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<sup>19</sup> An individual TLP grant recipient may have received more than one TLP grant award during the audit period.

**Table 2: Transitional Living Program Homeless Youth in Sampling Frame**

Randomly Selected TLP Grant Award Number	Number of Homeless Youth Serviced by Associated TLP Grant Recipient	Sample Size
1	7	5
2	6	5
3	6	5
4	14	5
5	34	5
6	20	5
7	10	5
8	16	5
9	24	5
10	28	5
11	8	5
12	20	5
13	4	4
14	22	5
15	16	5
16	32	5
17	14	5
18	34	5
19	17	5
20	17	5
21	4	4
22	29	5
23	28	5
24	20	5
25	25	5
<b>Total</b>	<b>455</b>	<b>123</b>

**SOURCE OF RANDOM NUMBERS**

We generated the random numbers with the Office of Inspector General (OIG), Office of Audit Services (OAS), statistical software.

**METHOD OF SELECTING SAMPLE ITEMS**

We sorted the primary sample units (TLP grant awards) by the grant number and then consecutively numbered the primary sample units in the sampling frame. We generated random numbers and used them to select 25 TLP grant awards for review. From the 25 primary sample units that we randomly selected, we obtained listings of the associated TLP grant recipients’ corresponding secondary sample units (homeless youth) by their TLP unique

identifier, or Social Security Number (if the unique identifier was not available). We sorted the listings and consecutively numbered the lines of the secondary units for each primary unit. We generated random numbers and used them to select 123 homeless youth for review in our second stage of the sample design.

### **ESTIMATION METHODOLOGY**

We used the OIG, OAS statistical software to estimate the number and percentage of homeless youth in the sampling frame that did not receive or did not have documentation of receiving the required transitional living services from TLP grant recipients that had an award during the audit period in accordance with Federal requirements. We calculated a point estimate and a two-sided 90-percent confidence interval.

**APPENDIX C: SAMPLE RESULTS AND ESTIMATES**

**Table 3: Sample Details**

<b>Randomly Selected TLP Grant Award Number</b>	<b>Number of Homeless Youth Serviced by Associated TLP Grant Recipient</b>	<b>Sample Size</b>	<b>Number of Homeless Youth in the Sample for Whom Required Shelter and Services Were Not Provided or Documented as Provided</b>
1	7	5	4
2	6	5	2
3	6	5	3
4	14	5	5
5	34	5	5
6	20	5	5
7	10	5	5
8	16	5	4
9	24	5	5
10	28	5	2
11	8	5	5
12	20	5	5
13	4	4	4
14	22	5	5
15	16	5	5
16	32	5	4
17	14	5	5
18	34	5	5
19	17	5	1
20	17	5	5
21	4	4	4
22	29	5	5
23	28	5	4
24	20	5	5
25	25	5	5
<b>Total</b>	<b>455</b>	<b>123</b>	<b>107</b>

**Table 4: Estimated Number and Percentage of Homeless Youth in the Sampling Frame for Whom Required Shelter and Services Were Not Provided or Documented as Provided**  
*(Limits Calculated at the 90-Percent Confidence Level)*

	<b>Number</b>	<b>Percentage</b>
Point Estimate	3,538	88.35%
Lower Limit	2,881	80.94%
Upper Limit	4,194	95.77%

## APPENDIX D: FEDERAL REQUIREMENTS

### STATUTE

#### Runaway and Homeless Youth Transitional Living Grant Program

#### 34 U.S.C. § 11222

##### *Section 11222, Eligibility*

In general

To be eligible for assistance under this part, an applicant shall propose to establish, strengthen, or fund a transitional living youth project for homeless youth and shall submit to the Secretary a plan in which such applicant agrees, as part of such project—

(1) to provide, by grant, agreement, or contract, shelter (such as group homes, including maternity group homes, host family homes, and supervised apartments) and provide, by grant, agreement, or contract, services, (including information and counseling services in basic life skills which shall include money management, budgeting, consumer education, and use of credit, parenting skills (as appropriate), interpersonal skill building, educational advancement, job attainment skills, and mental and physical health care) to homeless youth;

(2) to provide such shelter and such services to individual homeless youth throughout a continuous period not to exceed 540 days, or in exceptional circumstances 635 days, except that a youth in a program under this part who has not reached 18 years of age on the last day of the 635-day period may, in exceptional circumstances and if otherwise qualified for the program, remain in the program until the youth's 18<sup>th</sup> birthday;

\*\*\*\*\*

(6) to provide a written transitional living plan to each youth based on an assessment of such youth's needs, designed to help the transition from supervised participation in such project to independent living or another appropriate living arrangement;

(7) to develop an adequate plan to ensure proper referral of homeless youth to social service, law enforcement, educational (including post-secondary education), vocational, training (including services and programs for youth available under the Workforce Innovation and Opportunity Act), welfare (including programs under the Personal Responsibility and Work Opportunity

Reconciliation Act of 1996), legal service, and health care programs and to help integrate and coordinate such services for youths.

\*\*\*\*\*

## **REGULATIONS**

### **45 CFR Part 1351 Runaway and Homeless Youth Program (RHY)**

*Section 1351.23, What are the additional requirements that apply to the Basic Center, Transitional Living and Street Outreach Program grants?*

To improve the administration of these Runaway and Homeless Youth Programs by increasing the capacity of Runaway and Homeless Youth projects to deliver services, by improving their performance in delivering services, and by providing for the evaluation of performance:

\*\*\*\*\*

*Section 1351.25, What are the additional requirements that the Transitional Living Program and Maternity Group Home grantees must meet?*

(a) Grantees shall provide transitional living arrangements and additional core services including case planning/management, counseling, skill building, consumer education, referral to needed social and health care services, and education, recreation and leisure activities, aftercare and, as appropriate to grantees providing maternity-related services, parenting skills, child care, and child nutrition.

(b) Additional requirements included in the funding opportunity announcement.

*Section 1351.26, What are the additional requirements that both the Basic Center and Transitional Living Program grantees must meet?*

(a) Basic Center and Transitional Living grantees shall develop and implement an aftercare plan, covering at least 3 months, to stay in contact with youth who leave the program in order to ensure their ongoing safety and access to services . . .

\*\*\*\*\*

*Section 1351.31, What performance standards must Transitional Living Program grantees, including Maternity Group Homes, meet?*

\*\*\*\*\*

(e) Grantees shall ensure that youth have safe and appropriate exits when leaving the program. Each grantee shall report data on the type of exit experienced by each young person departing a Transitional Living Program.

## **OTHER FEDERAL REQUIREMENTS**

### **Funding Opportunity Announcement HHS-2017-ACF-ACYF-CX-1233**

#### *Project Requirements*

#### **III. Provide comprehensive services designed to help young people who are homeless make a successful transition to sustainable living.**

Projects must provide comprehensive services. Components of comprehensive services must include:

*Case Management:* Projects must provide intensive case management to youth receiving services. Listed below includes specific programmatic requirements for case management planning for youth and maternal group home projects.

#### **Individualized Service or Treatment Plan:**

Projects must develop, with every youth receiving services, a written service or treatment plan based on the person's goals that include evidence-informed strategies to assist with the trajectory of achieving sustainable living.<sup>20</sup> The plan should highlight support or activities required to achieve the desired goals, wants, and needs. Projects should do everything they can to support the choices made by youth experiencing homelessness. Whenever possible, projects should support participants' choices in the services that they receive.

#### **Record Keeping and Case Management for Infant/Toddler:**

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.

#### **Service Coordination Plan:**

Projects must coordinate with Continuum of Care (CoCs) to ensure that youth have access to all available resources, including adult mainstream services and youth services. In addition, projects must have a suitable referral plan based on an assessment of youth's needs to ensure appropriate systems of care services are accessible. These should include: a list of the systems of care, including

---

<sup>20</sup> Sustainable living means a reduced reliance on social services by having a self-sufficient network in place that provide support so that youth can maintain safe, stable, and appropriate housing. (For the purposes of this FOA).

social services, law enforcement, educational services, vocational training, welfare, legal services, and anti-trafficking agencies.

**Basic Life Skills Resources and Counseling Services:**

Projects must have a plan or curricula that inform every young person, either by group or individual setting, the fundamentals of basic life-skills to include:

- Money management, budgeting, consumer education, use of credit
- Interpersonal skill-building
- Educational advancement
- Job attainment skills
- Healthy relationships
- Mental and physical health care
- Individual and/or group counseling and parent/child counseling
- Recreation and leisure activities
- For MGH purposes, projects are also required to have parenting curricula that details pre-natal and post-natal care and how to care for an infant and toddler including: nutrition, safety, early learning, health, child care, emotional support, and stress reduction
- For MGH purposes, projects are also required to provide family engagement strategies

**Aftercare Services:**

Pursuant to 45 CFR § 1351.26(a) of the RHY regulation, grantees must develop and implement an aftercare plan, covering at least 3 months, to stay in contact with youth who leave the program in order to ensure their ongoing safety and access to services.

**Funding Opportunity Announcement HHS-2021-ACF-ACYF-CX-1905**

*Project Requirements*

*All TLP Projects MUST provide shelter AND supportive services. Choosing one or the other is not an option.*

Consistent with the statutory mandates set forth in the RHY Act, as well as the regulatory requirements set forth in the RHY Rule, TLP Projects will include the following components:

**Safe, Stable, and Appropriate Shelter**

TLP Projects must provide safe and stable shelter throughout a continuous period not to exceed 540 days, or in exceptional circumstances 635 days, except

that a young person who has not reached 18 years of age on the last day of the 635-day period may, in exceptional circumstances (as defined in the Appendix) and if otherwise qualified for the program, remain in the program until the youth's 18th birthday.

TLP Projects will have an arrangement with an age-appropriate emergency shelter in circumstances when there are no current TLP openings.

## APPENDIX E: ADMINISTRATION FOR CHILDREN AND FAMILIES COMMENTS



### ADMINISTRATION FOR **CHILDREN & FAMILIES**

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034  
Washington, D.C. 20201 | [www.acf.hhs.gov](http://www.acf.hhs.gov)

December 12, 2025

Carla J. Lewis  
Acting Deputy Inspector General for Audit Services  
U.S. Department of Health and Human Services  
330 Independence Avenue, SW  
Washington, DC 20201

Dear Acting Deputy Inspector General Lewis:

The Administration for Children and Families (ACF) appreciates the opportunity to respond to the Office of Inspector General (OIG) draft report titled, *ACF Can Improve Services to Homeless Youth by Strengthening Grant Recipients' Compliance with Transitional Living Program Requirements*, A-06-23-07001. The unfortunate lack of compliance by grant recipients during the previous administration highlighted by the OIG report underscores the need for this administration's focus on improving outcomes for children and youth. ACF will take the steps necessary to ensure homeless youth receive the shelter and services that lead to their successful transition from homelessness to self-sufficiency. Indeed, we have already taken action, including a series of webinar trainings focused on strengthening case management, documentation practices, and continuous quality improvement across grantee programs. These sessions provided guidance on effective service delivery, youth-centered case management models, and clear documentation standards to support high-quality outcomes for RHY organizations. ACF has instituted changes to notice of funding opportunity materials to provide clarity regarding reporting expectations. Please find our comments and response to the four draft report recommendations below.

**Recommendation 1: We recommend that the Administration for Children and Families create guidance and provide technical assistance for Transitional Living Program grant recipients related to documenting required services in homeless youth case files.**

**ACF Response:** ACF concurs with this recommendation.

Throughout the year, the Runaway Homeless Youth (RHY) Program provides training and technical assistance to grant recipients to communicate and reinforce program requirements. Two examples include the annual New Grantee Orientation, held in October or November of each fiscal year and the National Grantee Training held in November or December. Both training events provide information, technical assistance, and resources on a broad range of topics relevant to implementing services in a Family and Youth Services Bureau (FYSB)-funded RHY Program, including sessions on service documentation as part of case management. The RHY Program also provides training through a program-specific training series (e.g., Transitional Living Program (TLP), Maternity Group Homes for Pregnant and Parenting Youth Program, (MGH), Basic Center Program, etc.) offered bi-annually to provide training and best practices on strategies for implementing services under individual funded programs.

All RHY-funded programs are required to maintain individual case files for each youth served. These requirements are detailed in the annual Notice of Funding Opportunity (NOFO). As an example, grant recipients are required to provide case management that include detailing service, treatment, and services coordination plans. These plans are to include documentation that clearly describes the nature of services provided. The RHY Program's Frequently Asked Questions, available on the RHY Training, Technical Assistance, and Capacity Building Center (RHYTTAC) website, will be redistributed to all grant recipients to reinforce this requirement.

The RHY Program will continue to provide training, technical assistance, and guidance to all grant recipients to ensure proper documentation of services delivered to youth, which may include distributing a guidance document currently under development addressing documentation standards for services provided to youth. Federal Project Officers (FPOs) will continue to highlight the critical importance of documentation during monthly calls with grant recipients and in preparation for on-site monitoring visits.

**Recommendation 2: We recommend that ACF documents require service in homeless youth case files that allow for continuity even when employees change jobs.**

**ACF Response:** ACF concurs with this recommendation.

All RHY-funded programs are required to maintain individual case files for each youth served. These files must include documentation that clearly describes the nature of services provided. Maintaining case files ensures youth have access to information about services they received upon exit, supports staff awareness of service history, and promotes continuity of care. To assist grant recipients in maintaining compliance with this requirement, the RHY Program provides guidance documents, tip sheets, and training resources through the RHYTTAC eLearning platform, as well as during the New Grantee Orientation and RHY National Grantee Training and/or Program Specific Training Series. A guidance document is currently in development addressing documentation standards for services provided to youth. Once complete, it will be disseminated to RHY grant recipients.

**Recommendation 3: We recommend that ACF ensures required services are provided.**

**ACF Response:** ACF concurs with this recommendation.

The RHY Act requires FYSB to conduct on-site monitoring of grant recipients at least once in a 3-year period of performance. During the on-site monitoring visits, FPOs verify compliance with the RHY Act, RHY Final Rule, and published NOFO requirements.

The RHY Program provides robust training and technical assistance resources through the RHYTTAC website, eLearning portal, and scheduled training events. Each year, key opportunities include program-specific training in the spring, New Grantee Orientation in the fall, and the National Grantee Training in early winter, with additional sessions offered throughout the year on priority topics. Training content emphasizes program requirements,

Acting Deputy Inspector General Lewis

knowledge-building, and strategies for effective implementation. In addition to these offerings, the RHY program is currently developing a training webinar for grant recipients focused on effective case management strategies.

**Recommendation 4: We recommend that ACF maintain separate case files for children or infants of parenting youth.**

**ACF Response:** ACF concurs with this recommendation.

The TLP and MGH NOFOs currently require separate services and the documentation of services provided to dependent children. The NOFOs state, "...you must deliver individualized services for dependent children as well as the youth." Moving forward, FYSB will reinforce the requirement through training, technical assistance, and guidance to maintain separate case files for homeless youth and their children to ensure accuracy, accountability, and continuity of care.

Thank you again for the opportunity to review this draft report. Please direct any follow-up inquiries to S. Benita Turner, Director, Risk Management and Oversight, Office of Transformation, Business, and Management, at (771) 200-7454.

Sincerely,



Alex J. Adams  
Assistant Secretary  
Administration for Children and Families  
U.S. Department of Health and Human Services

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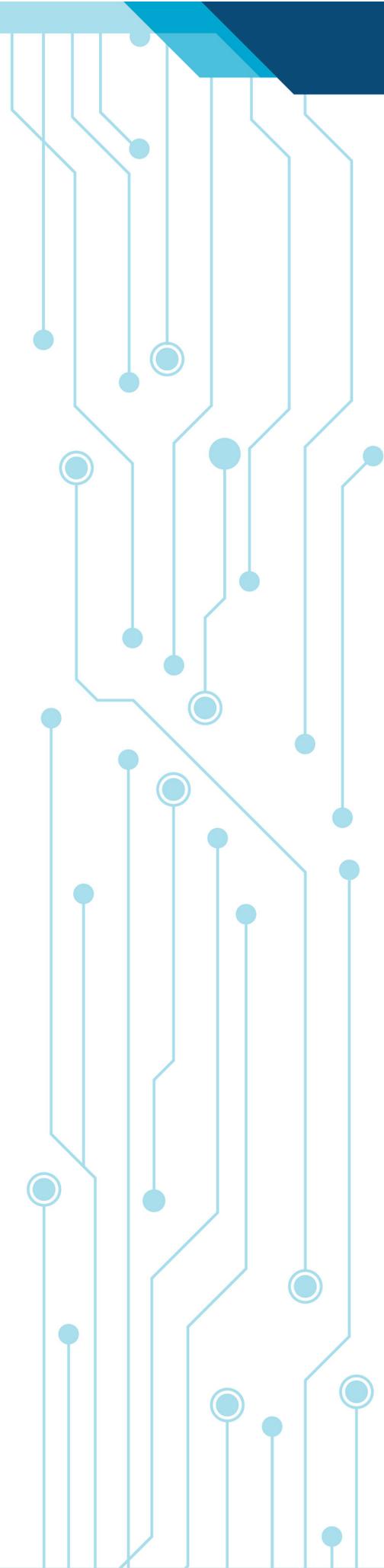
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Public Affairs  
330 Independence Ave., SW  
Washington, DC 20201

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