DSP Informational Memo Series 2020 - 07i February 14, 2020

To: DCF/DMCPS Administrator

DCF Area Administrators Child Placing Agency Directors Child Welfare Agency Directors

County Departments of Community Programs Directors County Departments of Human Services Directors County Departments of Social Services Directors

Group Home Providers

Tribal Social Service/Indian Child Welfare Directors

Private Child Placing Agencies Residential Care Center Providers

Shelter Care Providers Tribal Chairpersons

Continuum of Care Agency Directors

Wendy Henderson Wendy Henderson Administrator

Administrator

Re: Federal Foster Youth to Independence (FYI) Voucher Program

PURPOSE

From:

This memo provides:

- an overview of the federal FYI housing voucher initiative, including links to federal and state resources to further educate;
- information that identifies the key agencies in the voucher process and their specific roles;
- a discussion of program requirements and special considerations given Wisconsin's service structure.

BACKGROUND

Youth with experience in out-of-home care face a high risk of homelessness, especially if they aged out of care. Nationally, about 25 percent of young people who age out of care experience homelessness within four years. To help address this problem, in July 2019, the United States Department of Housing and Urban Development (HUD) introduced its federal Foster Youth to Independence (FYI) initiative to provide housing vouchers to youth who experienced foster care at age 16 and older and are homeless or at risk of being homeless. FYI vouchers are subject to availability and are financed with an existing \$20 million allocated for special purpose housing vouchers. How much a youth receives for a specific voucher depends on the cost of living in their area and their income. Voucher recipients are required to contribute towards their rent obligation; the voucher is applied to the remaining amount. These vouchers are not a substitute for working with youth to develop a detailed plan for housing following their time in care.

Full information about the FYI vouchers, including background, youth eligibility, process, and roles and responsibilities, are detailed in the HUD Notice PIH 2019-20 via https://www.hud.gov/sites/dfiles/PIH/documents/PIH-2019-20.pdf and HUD's FYI one-pager, available via https://www.hud.gov/sites/dfiles/PIH/documents/One Pager Overview of FYI Notice.pdf. HUD also maintains a FAQ document, which is updated frequently; the current version can be found via the FAQ link at https://www.hud.gov/program offices/public indian housing/programs/hcv/fyi tpv.

The provision of FYI vouchers is a new federal initiative that is applicable across the nation; as such, federal, state and local entities are in the early stages of requesting and providing these vouchers to eligible youth. HUD plans to monitor its implementation and will likely refine processes and provide additional guidance as this initiative evolves. DCF recommends keeping apprised of the most current version of HUD resources and guidance.

Voucher Administration Process in Wisconsin

Refer to HUD materials for complete information regarding program funding, voucher processes, and youth eligibility. Following are important considerations related to the structure of Wisconsin's child welfare system and its key partners:

Roles and Responsibilities

- Who are the Public Housing Authorities (PHAs) and what do they do?
 - There are 53 Public Housing Agencies in Wisconsin; you can find the complete list here: https://www.hud.gov/states/wisconsin/renting/hawebsites
 - PHAs receive federal funds to coordinate housing for low-income residents at rents they can
 afford. HUD Notice PIH 2019-20 details which criteria a PHA must meet to request FYI vouchers
 from HUD and administer them to recipients. Importantly, PHAs that currently administer the
 Family Unification Program (FUP) vouchers cannot administer the FYI vouchers.
 - A complete list of PHAs in Wisconsin that can administer the FYI vouchers is available via
 https://www.hud.gov/sites/dfiles/PIH/documents/PHAs with an ACC with HUD for HC Vs that do not administer FUP 080919.pdf.
 - Each qualifying PHA has the option to allocate up to 25 vouchers per fiscal year; a PHA may only
 request vouchers from HUD based on the referrals it receives. A PHA's decision to administer
 FYI vouchers is voluntary and they must administer vouchers according to state law.
- Who are the Public Child Welfare Agencies (PCWAs) and what do they do?
 - Given Wisconsin's service structure, the following stakeholders qualify to be PCWAs:
 - County and tribal social service agencies, outside of Milwaukee County;
 - Certain contracted partners, including, but not limited to Transition Resource Agencies (TRAs) (listed here: https://dcf.wisconsin.gov/map/il-r); and
 - Department of Children and Families Division of Milwaukee Child Protective Services (DMCPS), for Milwaukee County.
 - Under the law, agencies classified as PCWAs must be the ones to identify youth potentially eligible for the FYI voucher, verify youth eligibility according to HUD criteria, and make the youth referrals to the participating PHA(s) in their area. The role each PCWA plays and when depends on a young person's trajectory.
 - County and tribal social services agencies should discuss the FYI voucher with a youth who is transitioning from care and is at risk of homelessness upon discharge. This should be done in the six months leading up to discharge and as part of the Independent Living Transition to Discharge (ILTD) or comparable planning meeting(s). A youth's housing plans following time in care is a primary consideration within the ILTD or comparable plan and must be addressed during the youth's transition process. Since these youth will likely retain independent living (Chafee) eligibility after leaving care, the Transition Resource Agencies should also be part of these meetings.
 - TRAs should be familiar with the voucher process and assist youth who are eligible for independent living until age 21 and meet the voucher eligibility criteria. This may, for example, include youth who already transitioned from care and either did so before FYI vouchers were available, did not have a housing need at time of transition, or otherwise did not discuss the voucher as part of their transition process.
 - DMCPS will serve as the PWCA in Milwaukee County only; DMCPS staff will directly verify youth eligibility and, in collaboration with other stakeholders, coordinate youth referrals to the PHA(s).
 - PCWAs may make as many referrals as they like, so long as the youth referred meet the eligibility criteria; voucher receipt is contingent on voucher availability. A sample referral is available via https://www.hud.gov/sites/dfiles/PIH/documents/ Sample PHA Request for FYI TPVs.pdf.

What are the requirements?

- Two primary requirements are detailed below; see the HUD Notice and one-pager for full requirements regarding interagency partnerships for FYI voucher request and allocation.
 - Each PCWA must have a current partnership agreement(s) with the PHA(s) in their area in order to participate. Counties are encouraged to collaborate and develop the required MOU(s) with the PHA(s) in their area. A sample MOU is available via https://www.hud.gov/sites/dfiles/PIH/documents/SAMPLE_FYI_MOU_2019.docx.
 - DCF staff will coordinate with the TRAs to provide any necessary amendments to accompany the required MOUs between the TRAs and PHAs.
 - PCWAs that choose to refer eligible youth to receive a FYI voucher must provide or coordinate supportive services for the participating youth. For youth engaged with the TRAs, this requirement is met through the services offered in the independent living program. For other PCWAs, HUD strongly encourages that the PCWA and PHA collaborate with Continuum of Care (CoC) agencies within their state, or other partner agencies. See the HUD Notice and one-pager for more information on supportive service requirements.
 - You can find more information about Wisconsin's CoCs at the following links:
 - Dane County: https://www.danecountyhomeless.org;
 - Milwaukee County: http://milwaukeecoc.org;
 - Racine County: http://racinecoc.org; and
 - Balance of State (remaining 69 counties): https://www.wiboscoc.org

Important considerations

- Most of the youth eligible for the FYI voucher will also be eligible for independent living (Chafee) supports up age 21. The exceptions are youth who were in out-of-home care after age 16, as HUD requires, but then did not exit care in a way, per DCF policy, that retains their independent living eligibility to age 21 (adoption after age 16, Chapter 48 guardianship after age 16, or exited care at age 18 or older). You can review DCF's independent living eligibility requirements at https://dcf.wisconsin.gov/files/cwportal/il/pdf/il-eligibility.pdf.
- A youth who receives this voucher for rent support cannot also receive independent living funds
 for rental assistance; this would be considered a double federal subsidy. Chafee funds may
 continue to be applied for youth receiving the FYI voucher for other housing supports that are not
 rent, including, but not limited to, security deposit, furnishings, and other allowed independent
 living expenses.
 - In some circumstances, a young person may qualify for a FYI voucher, but may not qualify for independent living to age 21 (they did not leave care in an eligible way). If a young person is not eligible for independent living and TRA supports after leaving care, the TRA cannot serve as the PCWA to make a voucher referral. The county in which the youth was in care would fulfill that role.

Points of contact

- Questions about the vouchers, eligibility, or HUD or PHA requirements that are not answered in this memo or any of the documents linked herein be directed to FYITPV@hud.gov.
- For additional information about the FYI voucher process in Milwaukee County, or if you have questions, contact DMCPS Independent Living at DCFDMCPSIndependentLiving@wi.gov.
- For additional information or other questions, contact DCF Bureau of Youth Services staff at DCFILCoordinator@wi.gov.

CENTRAL OFFICE CONTACTS: Independent Living Coordinator

(608) 422-6990

DCFILCoordinator@wisconsin.gov

MEMO WEB SITE: https://dcf.wisconsin.gov/cwportal/policy