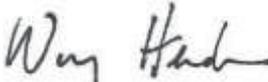


To: DCF/DMCPS Administrator
DCF Area Administrators
Child Placing Agency Directors
Child Welfare Agency Directors
County Departments of Community Programs Directors
County Departments of Human Services Directors
County Departments of Social Services Directors
Group Home Providers
Tribal Social Service/Indian Child Welfare Directors
Private Child Placing Agencies
Residential Care Center Providers
Shelter Care Providers
Tribal Chairpersons
Continuum of Care Agency Directors

From: Wendy Henderson
Administrator 

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

PURPOSE

This memo is a revision to DCF Informational Memo 2020-07, providing a review of the federal Foster Youth to Independence (FYI) housing voucher program and detailing a recent change to the program's scope. Previously, Public Housing Authorities administering the Family Unification Program (FUP) voucher could not also administer FYI; they may now do so if they meet a utilization threshold. Similarly, agencies that have 90 percent utilization of FYI vouchers may now request more than the prior limit of 25 vouchers per federal fiscal year. Finally, this memo includes clarification about how youth may access the FYI voucher while simultaneously receiving independent living (Chafee) supports.

BACKGROUND

As stated in DCF Memo Series 2020-07, 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.

Previously, Public Housing Authorities (PHAs) that administered Family Unification Program (FUP) vouchers could not also administer FYI vouchers. Additionally, those that administer FYI vouchers were not able to request more than 25 FYI vouchers in a given fiscal year. Per the most recent HUD Notice PIH 2020-28, PHAs that meet specific utilization thresholds may administer both FYI and FUP and/or request more than 25 FYI vouchers per federal fiscal year.

INFORMATION SUMMARY

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>, HUD Notice PIH 2020-28 via <https://www.hud.gov/sites/dfiles/PIH/documents/pih2020-28.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. Note that PIH 2020-28 supersedes PIH 2019-20.

The provision of FYI vouchers is a 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 Notices PIH 2019-20 and PIH-2020-28 detail which criteria a PHA must meet to request FYI vouchers from HUD and administer them to recipients.
 - Previously, PHAs that administer the Family Unification Program (FUP) vouchers **could not** administer the FYI vouchers. However, as detailed in HUD Notice PIH 2020-28, PHAs that administer FUP may now also administer FYI *if* they have utilized at least 90 percent of the FUP vouchers at the time of the request and their utilization is accurately reported to HUD.
 - A PHA's decision to administer FYI vouchers is voluntary and they must administer vouchers according to state law.
 - 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.

- Per HUD Notice PIH 2020-28, PHAs that receive the initial maximum cap of 25 vouchers in a fiscal year and achieve at least 90 percent utilization of the FYI vouchers may request up to an additional 25 vouchers. HUD will not award PHAs with more than 50 vouchers in a fiscal year.
- 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_TPV_s.pdf.

What are the requirements?

- Two primary requirements are detailed below; see the HUD Notices 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 Notices 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://milwaukeeecoc.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>.
 - 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.
- It is possible that a youth who receives this voucher for rent support will also receive independent living (Chafee) funds for rental assistance. This is allowable, though it is possible that the PHAs will consider Chafee funds – whether directly or via a provided service – to be income for the young person. All income, regardless of direct or indirect, should be reported to the PHA for consideration.
 - Any support that is regular and recurring (e.g. monthly rent or cell phone payments) is considered income, whereas support that is sporadic or nonrecurring can be excluded (e.g. one-time security deposit payment). A full list of HUD income exclusions is included in the [Electronic Code of Federal Regulations - 24 CFR 5.609 \(c\)](#).

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 FYI@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 CONTACT:

Independent Living Coordinator
Phone: (608)422-6990
Email: DCFILCoordinator@wi.gov

MEMO WEB SITE:

<https://dcf.wisconsin.gov/cwportal/policy>