

FAMILY UNIFICATION PROGRAM VOUCHERS: HOW-TO GUIDE FOR PUBLIC CHILD WELFARE AGENCIES

Working with Housing Partners to Successfully Administer FUP Vouchers for Families

OVERVIEW

CSH estimates that there are almost 90,000 families and youth in need of supportive housing, including 43,646 with child welfare involvementⁱ. Black, Indigenous, and Latinx families and youth are disproportionately represented within this numberⁱⁱ. Housing vouchers play a significant role in helping to keep families safely together, reunify successfully, and reduce re-involvements with child welfare. Children and youth who have a reliable place to call home spend fewer days in foster care, experience a reduction in subsequent abuse and neglect cases, reduce their risk of subsequent homelessness, and increase their school attendance.ⁱⁱⁱ 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 Family Unification Program (FUP) vouchers to families in need of housing. Also included are best practices and lessons learned from other jurisdictions that have successfully partnered to administer FUP in the past. Those unfamiliar with FUP may benefit from first reading [How the Family Unification Voucher Program Keeps Families Together Through Crisis](#) to gain a better understanding of the basic concepts and approach to the program.



TABLE OF CONTENTS

- OVERVIEW 1
- FUP VOUCHER APPLICATION AND PROGRAM REQUIREMENTS 3
 - PHA and PCWA Partnerships 3
 - Required and Optional MOU and Program Components..... 3
 - Required and Optional Components of the FUP Program 4
 - Roles and Responsibilities..... 5
 - Eligibility Criteria 6
 - Income Requirements..... 7
 - Guidance and Strategies 8
 - Maintaining Strong Partnerships 8
- IDENTIFICATION OF FUP ELIGIBLE FAMILIES 9
 - Prioritization and Referral System 10
 - Access and Navigation Assistance 12
 - Challenging Histories/Backgrounds 13
 - Securing a Housing Unit 14
 - Ensuring Adequate Family Supportive Services and Supports 15
 - Addressing Common Myths..... 18
- CONCLUSION 20

FUP VOUCHER APPLICATION AND PROGRAM REQUIREMENTS

PHA and PCWA Partnerships

FUP 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^{iv}. If you are unsure if your jurisdiction currently has or has received FUP in the past, HUD maintains a list of all jurisdictions with FUP vouchers and their contact information. That information can be found here:

- [FUP Awards All Years](#)
- [PHA Contact Information](#)

To qualify for FUP, a PHA must have a formal partnership with a PCWA that has been established through a Memorandum of Understanding (MOU) and signed during the application period established in the NOFO. Also included in the MOU is the local Continuum of Care (CoC). The CoC's role is to help identify CoC-funded services available for families and to 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 all three agencies enter the MOU together, the PHA and PCWA carry most of the responsibility for developing and administering the program. The process to formalize a partnership can be initiated by a PHA or PCWA.

Required and Optional MOU and Program Components

HUD requires the MOU between the PHA and PCWA address several aspects of the partnership, including a statement of cooperation, shared goals and standards for administering the program, outlined roles and responsibilities, how families will be assisted in finding housing, and types of services provided for youth. To receive a higher rating on the application, applicants may also include additional information regarding aspects of working with families (see chart below). HUD has provided a template MOU that can be used for new applicants. The template can be found here:

- [HUD Sample FUP Memorandum of Understanding](#)

Required and Optional Components of the FUP Program

The following chart highlights some key required and optional components as outlined in recent FUP NOFOs. Generally, these elements must be documented in the MOU, including identifying which partner(s) organization is responsible.

Element	Required	Encouraged/Optional
Partnership	Commitment to coordinate between PCWA, PHA and CoC	Previous coordination between PHA, PCWA, 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 liaisons	
Roles and Responsibilities	How the PHA, PCWA, and CoC will fulfill their respective roles and responsibilities	
Housing Search	Assist families to locate housing; Work with landlords to secure appropriate housing units	Assist families to access housing in low-poverty census 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 family needs; Provide/make referrals to needed services
Self Sufficiency		Targeted FUP enrollment into active/planned Family Self-Sufficiency Program or similar

Roles and Responsibilities

The following chart summarizes many important PCWA and PHA roles and responsibilities for securing and implementing FUP. Generally, these should be documented in the required MOU along with the roles of the Continuum of Care. These roles can include staff liaison and any optional services or support provided to connect families to housing resources that they may be eligible for.

PHA Roles and Responsibilities	PCWA Roles and Responsibilities
MOU signatory, applicant for FUP vouchers, and commitment to administer all awarded FUP vouchers and maintain voucher utilization rate of at least 90%.	MOU signatory, commitment to partner with PHA in administering FUP.
Amend administrative plan and processes for FUP program requirements, and train PCWA and CoC staff on HCV program	Provide assessment of anticipated need for vouchers over the next 12 months with PHA, and train PHA and CoC staff on relevant work of PCWA as it relates to FUP-eligible families
Develop FUP goals and standards of success; Develop data and metrics for tracking/improvements.	Develop FUP goals and standards of success.
Designate FUP liaison staff.	Designate staff FUP liaison.
Conduct regular meetings with PCWA and CoC partners.	Participate in regular meeting with PHA and CoC partners.
Refer families on HCV waiting list that may qualify for FUP to PCWA for consideration/review.	Implement system to identify and prioritize eligible families on PCWA caseload, reviewing caseload for eligible families at least monthly when vouchers available.
Accept referrals of families certified eligible from PCWA, determine HCV eligibility, place on HCV waiting list and assist per PHA admission policies. An otherwise closed PHA HCV waiting list can be opened exclusively for FUP.	Refer/certify an eligible and prioritized family (or youth) to PHA within 30 days of notification of an available FUP voucher.
Provide or secure required assistance and any optional services and supports for families.	Provide or secure required assistance and any optional services and supports for families.
Voucher administration - tenant briefing, issuance, unit quality inspection and approval, landlord contracts/payments, examinations of family income/composition, rent calculations.	

Eligibility Criteria

FUP can be used by both families and youth transitioning from care. Expectant and parenting young people can be served through either category as long as they meet the other eligibility criteria. Many PHA serve both family and youth populations, prioritizing based on presenting needs at the time of an available voucher. PHA and their PCWA partners can propose allocating a specific number or percentage of FUP vouchers specifically for each population. If implementing this strategy, the PHA must document the local housing needs for each population used to justify this approach and amend their Administrative Plan to reflect this specific breakdown of vouchers by population.

FUP provides a non-time limited voucher for Families for whom the lack of adequate housing is a primary factor in:

- The imminent placement of the family's child or children in out-of-home care (i.e. foster care), or
- The delay in the discharge of the child or children to the family from out-of-home care.

FUP provides an up to 36-month housing voucher for Youth ages 18 through 24 years who:

- Left foster care at age 16 or older or will leave foster care within 90 days through the formal child welfare transition plan, and
- Is experiencing or is at risk of experiencing homelessness.

Based on guidance from HUD^v, families and youth meet the definition for “lack of housing” if they are:

- Living in substandard or dilapidated housing
- Homeless.
- In imminent danger of losing their home
- Displaced by domestic violence
- Living in an overcrowded unit
- Living in housing inaccessible to the child or children with a disability, or to youth due to the nature of the disability.



HUD further indicates that youth meet the definition of “at risk of homelessness” if they:

- Have an annual income below 30 percent of median household income for the area, as determined by HUD;
- Does not have sufficient resources or support networks, such as family, friends, faith-based or other social networks, immediately available to prevent them from having a lack of housing or moving to an emergency shelter; and
- Meets one of the following conditions:
 1. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 2. Is living in the home of another because of economic hardship;
 3. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 4. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 5. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons per room, as defined by the U.S. Census Bureau;
 6. Is exiting a publicly funded institution or system of care (such as a healthcare facility, a mental health facility, foster care or other youth facility, correction program or institution); or
 7. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

Income Requirements

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

- [HUD Income Limits](#)

Guidance and Strategies

Historical challenges related to FUP range from limited access to supportive services, especially as family's needs extend beyond child welfare involvement, finding affordable units and landlords, and getting vouchers to intended families at the earliest point possible to maximize impact. 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 regulatory improvements to the FUP program. Recent FUP NOFOs from HUD^v include enhancements to requirements and rating factors that better align with emergent practices, research, and lessons from the field from more than three decades of practice.

Maintaining Strong Partnerships

Successfully embedding housing vouchers in services for child welfare involved families and youth 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.

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

- Make the case for the need for FUP, 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 families in participating/benefiting from services, and how services can support family 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 as an opportunity to increase the supply of vouchers, with the added benefit of a corresponding increase in HUD funding to PHA for voucher administration.

Tips to prepare for a future FUP funding application or enhance existing FUP:

- 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. Review and address NOFO Rating factors to both maximize competitiveness of an application and to support successful implementation and voucher utilization.
- Include parents and 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.
- 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.
- Focus on implicit biases in budgetary, programmatic, and policy decisions. Include parents 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 programs. PHA and PCWA should utilize data disaggregated by race alongside qualitative data from families with lived experience to better understand and address racial disparities. PHA and PCWA should use this data to develop concrete actions to advance racial equity and ensure that specific cultural needs are met through the development and implementation of FUP partnerships.

IDENTIFICATION OF FUP ELIGIBLE FAMILIES

A PCWA is responsible for systematically identifying and referring eligible families and youth within their caseload. The PCWA workforce often has limited understanding of housing, coupled with broad and complex mandates and competing requirements. Approaches for improving information on families' housing status throughout the child welfare process include:

- Consider adopting a [family housing stability framework](#) that will arm the PCWA with tools and accessible resources in order to consistently identify and better connect families to housing resources such as FUP.

- Embed questions to identify family housing stability within child welfare intake or assessment tools to uniformly identify housing instability at key points throughout the process, as family circumstances may change. A recommended approach to developing systematic policy, process, and questions to identify family housing needs is working with people with lived experience to provide input and lead the design of the process.
- [Use cross-sector data](#) to help identify, understand, and respond to family housing needs through enhanced data collection, data sharing partnerships and analysis. Analyses include 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 the families across systems that provide services and supports. Linking data from the PCWA Information System and Homeless Management Information Systems will help identify families 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 CoC to create other avenues for eligible families to be identified and referred to the PCWA for consideration.

Prioritization and Referral System

PCWA is responsible for establishing and implementing a system to refer eligible and prioritized families to the PHA for available FUP vouchers. When utilized strategically and collaboratively, FUP provides unique opportunities to target rental assistance to specific families in a way that can enhance equity outcomes and help PCWA better address their mandates and requirements.

Based on direction provided by HUD, a system should prioritize for FUP as follows:

- Families having an open preservation case related to a substantiated maltreatment report whose children are at high risk for out-of-home placement;
- Families having an open reunification case with children currently in out-of-home care, at high risk for experiencing additional negative child welfare outcomes and where housing assistance could help the parent(s) to stabilize and participate in any other services necessary for subsequent reunification.

HUD directs that if a voucher is available, a PCWA should refer prioritized families as soon as they are identified. PCWA should not wait to make the referral until successful completion of other aspects of their case/treatment plans. FUP can help families to resolve their housing crisis, and from a foundation of housing stability, engage in services to strengthen and unify their family.

Considerations for developing prioritization criteria:

- Involve partners, including those with lived experience, in developing prioritization and a referral system that centers the experiences, strengths and needs of families and maximizes opportunities to shift the trajectory of a child welfare case.
- Consider additional negative child welfare outcomes that families face, including:
 - Long-term open cases, permanent separation/termination of parental rights, reentry to the child welfare system, youth aging out of care without permanency or a stable home.
- Consider the histories, complex challenges, barriers, needs, strengths of families. Engage partners and use data to determine answers to the following questions:
 - Who needs assistance most and is least likely to obtain housing or successfully end their child welfare involvement without assistance?
 - Which families are most burdened – more likely to be referred to PCWA, more likely to face child removal, more likely to experience a termination of parental rights? How do child welfare requirements and timelines factor in? What are racial equity implications?
 - Are family members facing behavioral health or complex medical needs? What are family challenges and strengths related to education, employment, childcare, housing history? How might impacts of trauma, violence, family disruption and chronic stress lengthen or intensify a family’s journey toward healing, and how might housing positively support this process?
- Avoid mind traps/judgment about families being “housing ready.” Instead, view housing as a foundational prerequisite to family stability and thriving and a tangible means for a PCWA in carrying out the mandate to make reasonable/active efforts to preserve and reunify families.
- Structure the system so that prioritization is assessed in relation to an available housing voucher. Consider who is in the most need or highest priority. Who would get the maximum value from this housing resource right now? Often a family that is in need now is highly motivated and already has PCWA connections and support. Consider how these factors might support a successful voucher utilization.

Strategies:

- Create designated staff as housing liaisons or offices 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 and other potential housing resources. Some jurisdictions use case conferencing or family housing panels.
- Leverage PCWA staff FUP liaison to manage and maintain system of identification and referral.

Access and Navigation Assistance

Understanding and navigating the admission and voucher leasing processes and required documentation can be overwhelming, especially for families in crisis.

Strategies:

- Offer support for families in understanding and completing required paperwork and collecting documentation.
- Work with PHA and partners to educate on required documentation and identify potential alternative documentation.
- Create agreements across government agencies to streamline access to required documents and verifications.

“I love the idea of a liaison who keeps open communication between PCWA and PHA on a regular basis. That is so important. They could onboard their new workers to better educate about HUD rules and regulations.”

- Parent

“In addition to child welfare involvement, job loss more than once, domestic violence and past convictions were huge barriers for me to provide a stable and safe home for my children.”

- Parent

- PCWA workers can proactively help families to collect and secure documents early in anticipation of future voucher issuance.
- Provide additional support and navigation through the admission and leasing processes.
- Help families develop a housing resume with housing history, explanations and strengths.

Challenging Histories/Backgrounds

FUP eligible families commonly face hurdles and biases related to aspects of their histories that prevent or delay voucher issuance or housing access. Factors often relate to eviction, legal or financial challenges, substance misuse or incarceration histories identified through background checks.

Below are common barriers and mitigating strategies:

- 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 involved populations and supported family strengths.
- PCWA misunderstanding PHA policies and processes. Staff may be unclear on policies or have heard inaccurate stories about the policies. Also, staff may not be clear on potential opportunities to address policies and denials.
 - PHA can review Administrative Plan with PCWA, including sections regarding background histories to ensure mutual understanding.



SPOKANE, WA

PHA amended their Administrative plan, lowering or eliminating eligibility criteria barriers related to challenging backgrounds. They developed strong PHA, PCWA and broader multi-agency partnerships, revised referral pathways, and host regular liaison/meetings with PCWA, PCWA liaison. Partners engaged in data-driven continuous improvement and are deploying FUP vouchers as a part of a larger Keeping Families Together supportive housing initiative. PHA and PCWA identified alternative options for required documentation and streamlined processes. PHA trained four PCWA staff to support families with FUP paperwork and navigate housing process with families and case workers.

- PCWA can proactively help families prepare documentation (what has changed, circumstances, documentation to counter, etc.) to mitigate the chance of denials.
- Even if denied, the PCWA can educate a family on 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 families.
 - Educate, offer housing resume, support family in advocacy – focusing on strengths, explaining circumstances and making landlord assurances.
- Families have outstanding balances related to housing or utilities that must be resolved before landlord or utility approval.
 - Provide financial supports for past rent or utility balances, and for move in, security and utility deposits.

Securing a Housing Unit

Families face additional challenges in using housing vouchers when 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 children, youth and families cannot wait until housing supply catches up with demand. In addition, families experiencing crises may find the process of navigating the housing market to be daunting and overwhelming. Yet, there are strategies that can improve utilization of FUP vouchers.

Common factors and strategies include:

- Lack of available rental units within HUD approved PHA payment and subsidy standards, which are the maximum rent amount and approved max bedroom size based on family composition (related to FMR). This is often an even greater challenge for families requiring larger units.
 - 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.

“I created a folder that lists all my achievements to counteract my past convictions and lack of rental history. Personal references also were a big help in using my voucher to secure a long-term stable home for myself and my children.”

- Parent

- o PCWA, PHA and partners can explore if feasible to project-base a portion of FUP vouchers, meaning vouchers would be attached to a specific unit set aside for the FUP population.
- o PHA and PCWA can work together to identify/elevate needs, barriers, opportunities faced by family voucher holders to developers of affordable and supportive housing. This may include a need for more family units and relevant amenities.
- Families unable to successfully secure a housing unit.
 - o Provide housing navigation supports directly or through a partner who will engage and assist families in [preparation](#), housing search, landlord outreach, negotiation, and moving in.
 - o Incorporate strategies to help families secure a unit in a low poverty area, such as neighborhood tours, unit viewings, or landlord introductions.
 - o Consider parents/family members with relevant lived expertise to serve as peer housing navigators.
 - o [Engage, educate, and partner with landlords](#) to create and maintain housing availability for voucher holders, create landlord incentives.

Ensuring Adequate Family Supportive Services and Supports

For some families, housing alone may not be enough. Families need quality supportive services paired with rental assistance can access and maintain housing, progress toward child welfare goals and reach self-sufficiency. Yet, historically, many FUP families have not been matched with needed services. While optional, HUD encourages partners to provide an array of supports and services to families. Further, in more recent NOFOs, rating factors have included the potential to earn additional points when FUP partners commit to providing all FUP recipients with access to Family Self Sufficiency or similar programs and case management services for at least six to twelve months minimum.



KEEPING FAMILIES TOGETHER

CSH developed [Keeping Families Together \(KFT\)](#) as a two-generation approach to supportive housing for families facing child welfare involvement, housing instability and complex need/histories. By leveraging the FUP voucher and services through the KFT supportive housing model, needs of families facing homelessness and child welfare involvement can be effectively addressed through one initiative. The KFT model provides PHAs and PCWAs a platform to build on their FUP relationship and fill gaps, capitalizing on child welfare resources and community-based services that address the trauma and challenges faced by each family member. Families stay together, reunify, maintain stability, and thrive.

KANSAS CITY, MO

This cross-sector One Roof partnership includes the Housing Authority of Kansas City, the local CoC, and the Children's Division for Jackson County, the court guardian ad litem, along with several supportive service providers and contracted foster care case management providers. Partners implemented Keeping Families Together supportive housing using FUP vouchers for families as a housing subsidy paired with the multi-agency supportive services to serve families with multiple at-risk characteristics, including histories of involvement with the justice system. Challenging background histories as barriers to FUP placement became apparent early on, and partners worked to clear family member warrants and prepare documentation to demonstrate circumstances and changes. The PHA eventually updated criteria for FUP and reduced background related barriers within their Administrative Plan.

Several jurisdictions have shifted their view of FUP. Rather than thinking of FUP as a separate program, they are seeing it as a housing subsidy resource to pair more holistically with 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 family and community needs and goals.

Tips to accomplish this:

- Identify and map what you have and what is needed.
- Put families in the center and orient services around what is convenient and effective for them, rather than what is most convenient and efficient for partner agencies. Trust families when they say what they need and how they need it.
- Break through siloes – create aligned or integrated approaches with creativity/innovation, as well as braiding/aligning funding sources to create flexible funds for services.

Considerations:

- What other resources do we have in our community? Are there community assets that families access and trust? Who else has an interest and/or is serving families? How could we braid or blend across multiple funding streams to create access to family services? Might we connect 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 children, youth and overall family needs so that FUP participation is set up for success?

Potential funding resources^{vi} and partners to explore for family services/supports:

- Child Welfare - Title VI-E – Family First Prevention Services; CAPTA; Title VI-B – Child Welfare Services, Promoting Safe and Stable Families, Regional Partnership Grants
- Behavioral Health – SAMSHA block grants/funding for mental health/substance misuse, Family Treatment/Drug Courts
- Public Benefits – TANF, SNAP
- Maternal and Child Health Early Childhood (MCHVIE)- Home Visiting, Head Start, Early Childhood Courts
- Education - Community Schools
- Health – Medicaid, Federally Qualified Health Centers, Managed Care Entities
- PHA programs/resources - Family Self-Sufficiency Program
- Family Resource Centers, Community Action Agencies and other community, faith based, peer and BIPOC led organizations
- Other Federal – CoC, CSBG, CDBG, SSBG, Indian Housing Block Grant, Veterans Affairs, Workforce
- State and Local funds
- Resident services – when project-basing vouchers, leverage onsite resident services for families

“There was a time that I lost my housing voucher after my kids entered foster care because of the PCWA misunderstanding the rules around that. If my advocate had not educated my social worker that I do not need to have my children back before accessing the voucher, I might have lost my parental rights due to inability to rent a place on minimum wage. Regaining a housing voucher allowed me to embrace the support from services without having to worry about how to pay rent and complete services that would amount to another full-time job.”

- Parent

Addressing Common Myths

Several misconceptions have been identified within PCWA and PHA partnerships working with FUP 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
<p>Families must be experiencing literal homelessness or have a certain homelessness assessment score to be eligible. (Doubled up, etc.)</p>	<p>HUD has broadened definitions to account for population circumstances and risks. The “lack of adequate housing” definition for FUP is more flexible than HUD homeless assistance programs definition. For example, inadequate housing includes circumstances of a family currently housed but who cannot remain without negative child welfare implications due to certain household member characteristics, and/or housing that would be overcrowded upon reunification or inaccessible due to nature of child’s disabling condition.</p>
<p>PCWA cannot refer families to FUP unless housing is the main factor that will lead the child welfare agency to separate a family, or until housing is the only remaining challenge impeding reunification for a family.</p>	<p>Per HUD, referrals should be made for priority families as soon as they are identified. Child welfare agencies should not wait to complete other aspects of family case plans before referring to FUP. When there is a delay between the time a family is referred and the time they are issued a voucher, the selected family may no longer meet the program intent. Then, FUP may not benefit families within the PCWA caseload that would benefit most from FUP, are most vulnerable, and most at risk. Additionally, child welfare agencies and courts are mandated by a number of federal and state laws that require operating within tight timeframes and making quick decisions. Access to FUP could change the trajectory of the case and give families a fair shot and real chance at success.</p>
<p>PCWA must send referrals for all FUP eligible families to PHA as soon as identified.</p>	<p>A PCWA has up to 30 days to refer an eligible family once notified by PHA of an available FUP voucher. This is an example of a promising practice: child welfare organizations can identify the housing needs of families on an ongoing basis, but only refer families to the PHA when a voucher is available. This helps prevent families from ending up on a lengthy PHA waiting list, which can reduce the impact of a voucher. With lengthy waiting lists, a family could become ineligible or fall outside of the intended target population. To reduce negative child welfare outcomes, PHA and PCWA should have regular communication between identified liaisons and</p>

	<p>clear processes in place to alert of anticipated voucher openings. When there are anticipated openings, PCWA should identify and refer the families who are most in need based on current information, particularly where a voucher can change the course of a child welfare case, rather than referring primarily based on the length of time a family has been on an internal waiting list.</p>
<p>When children are placed in 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.</p>	<p>Federal law and regulations are set up to ensure that children temporarily placed in foster care are counted as part of the household. PHA should not set time limits for how long a child(ren) 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 just needs to certify that the family meets child welfare and housing instability circumstances in FUP eligibility requirements. A referral or certification of this is all that the PHA needs to have in their files for verification and audit purposes. PCWA can confirm that reunification remains a case goal. PHA should not have child welfare case details/specifics in PHA files. Per HUD:</p> <ul style="list-style-type: none"> • 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. • The PHA is not required to maintain full documentation that demonstrates the family or youth’s FUP eligibility. In order to maintain an audit trail the PHA should keep the referral or certification from the PCWA. <p>Federal statute, 42 U.S.C. 1437a, states (C) ABSENCE OF CHILDREN. — <i>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.</i> This federal requirement applies to federally funded housing assistance programs, including but not limited to FUP 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 for families with child welfare involvement, families’ unit size is not to be reduced while reunification remains a possibility.</p>

<p>Parent(s) lose housing if reunification does not occur, or when children/youth reach adulthood and leave the household.</p>	<p>If parents lose their parental rights or when children reach adulthood, a PHA may not terminate a family from the program. In these situations, a PHA may transfer the parents to their general HCV program.</p>
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CONCLUSION

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 other challenges? Send a note with your questions or examples to 1Roof@csh.org.

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.

ACKNOWLEDGEMENTS

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ⁱ [Supportive Housing Need in the United States \(CSH\)](#)

ⁱⁱ CSH Racial Disparities and Disproportionality Index: <https://www.csh.org/supportive-housing-101/data>

ⁱⁱⁱ Metis Associates (2010), Keeping Families Together: An evaluation of implementation and outcomes of a pilot of supportive housing models for families involved in the child welfare system.

^{iv} HUD published all information on available funding at <https://www.hud.gov/grants>.

^v [Family Unification Vouchers \(HUD\)](#)

^{vi} [A Primer on Affordable Housing Development and Key Funding Sources \(hudexchange.info\)](#)