

# Youth Family Unification and Family Self-Sufficiency Demonstration Informational Webinar

**Thursday, January 28, 2016  
2:00 pm – 3:30 pm Eastern**



# Overview of Webinar

- **Introduction and Purpose of Webinar**
  - Kevin Solarte, Special Assistant, Office of the Secretary, U.S. Department of Housing and Urban Development
- **Role of US Interagency Council on Homelessness**
  - Jasmine Hayes, Policy Director, US Interagency Council on Homelessness
- **Overview of Family Unification Program (FUP) and the Demonstration**
  - Ryan Jones, Housing Program Specialist, Office of Public and Indian Housing (PIH), U.S. Department of Housing and Urban Development
- **Overview of the Family Self-Sufficiency Program (FSS)**
  - Amaris Rodriguez, Housing Program Specialist, Office of Public and Indian Housing (PIH), U.S. Department of Housing and Urban Development
- **Review of Research Findings From Youth FUP Study**
  - Dr. Amy Dworsky, Research Fellow, Chapin Hall at the University of Chicago
- **Questions**





# Role of USICH

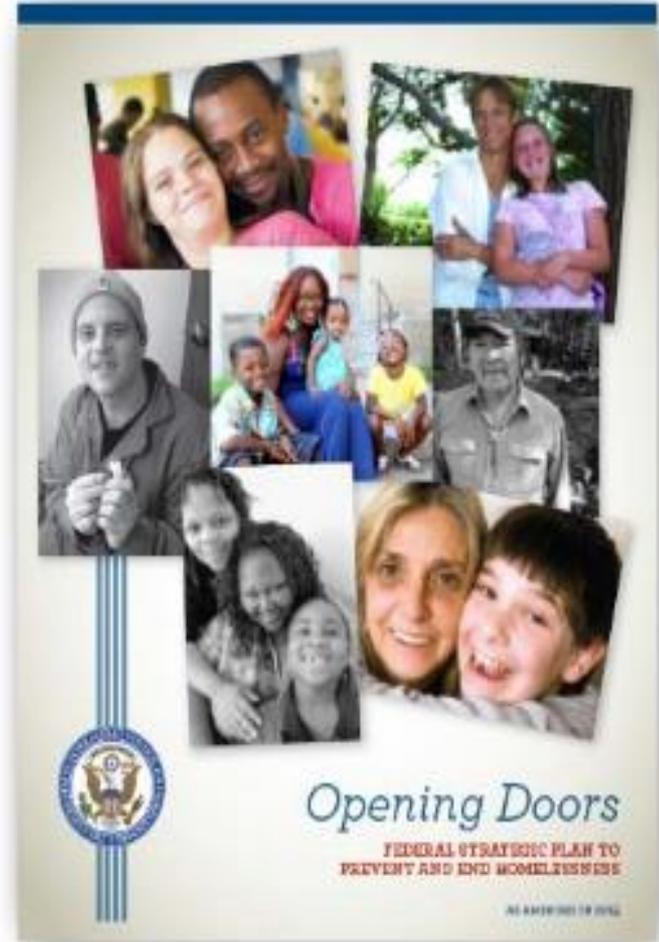
- **Coordinates** the Federal response to homelessness
- **Maximizes** the effectiveness of 19 Federal agency partners
- **Shares** best practices
- **Drives** collaborative solutions



# Opening Doors, as amended in 2015

- Prevent and end homelessness among Veterans in 2015
- Finish the job of ending chronic homelessness in 2017
- **Prevent and end homelessness for families, children, and youth in 2020.**
- Set a path for ending all types of homelessness in 2020.

Read the plan: <https://www.usich.gov/opening-doors>





# Preventing and Ending Youth Homelessness: Two Strategic Action Areas

- **#1 - Build the foundation for a coordinated and comprehensive community response**
- **#2 – Build the capacity of local communities to implement the components of a coordinated and comprehensive community response**

Learn more: [Coordinated Community Response to Youth Homelessness](#)

## Preventing and Ending Youth Homelessness *A Coordinated Community Response*



Interagency Working Group on Ending Youth Homelessness

Co-Chairs:  
U.S. Interagency Council on Homelessness  
Department of Health and Human Services  
Department of Housing and Urban Development

Members:  
Department of Education  
Department of Justice  
Social Security Administration  
Department of Labor

In *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*, we set a national goal to prevent and end youth homelessness in 2020. To get there, it will take all of us—government, non-profits, business, and philanthropy—to make sure every community has the capacity to achieve the goal.

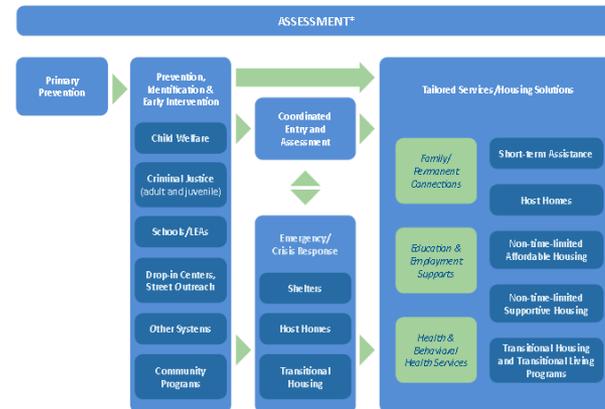
Our understanding of the scope and dynamics of youth homelessness is growing. While we continue to learn more every day, we must act now to build the comprehensive and coordinated response that young people need to end their homelessness forever.

*This document provides a preliminary vision for such a response. It draws upon what we know works to end homelessness for other populations, along with strategies that support the unique needs of unaccompanied youth and young adults under 25.*

We hope you'll use this document to advance discussions in your communities and build upon the work already underway. To receive additional tools and resources that will be developed to support the implementation of this response, [sign up for our newsletter](#).

### Our Preliminary Vision for a Community Response

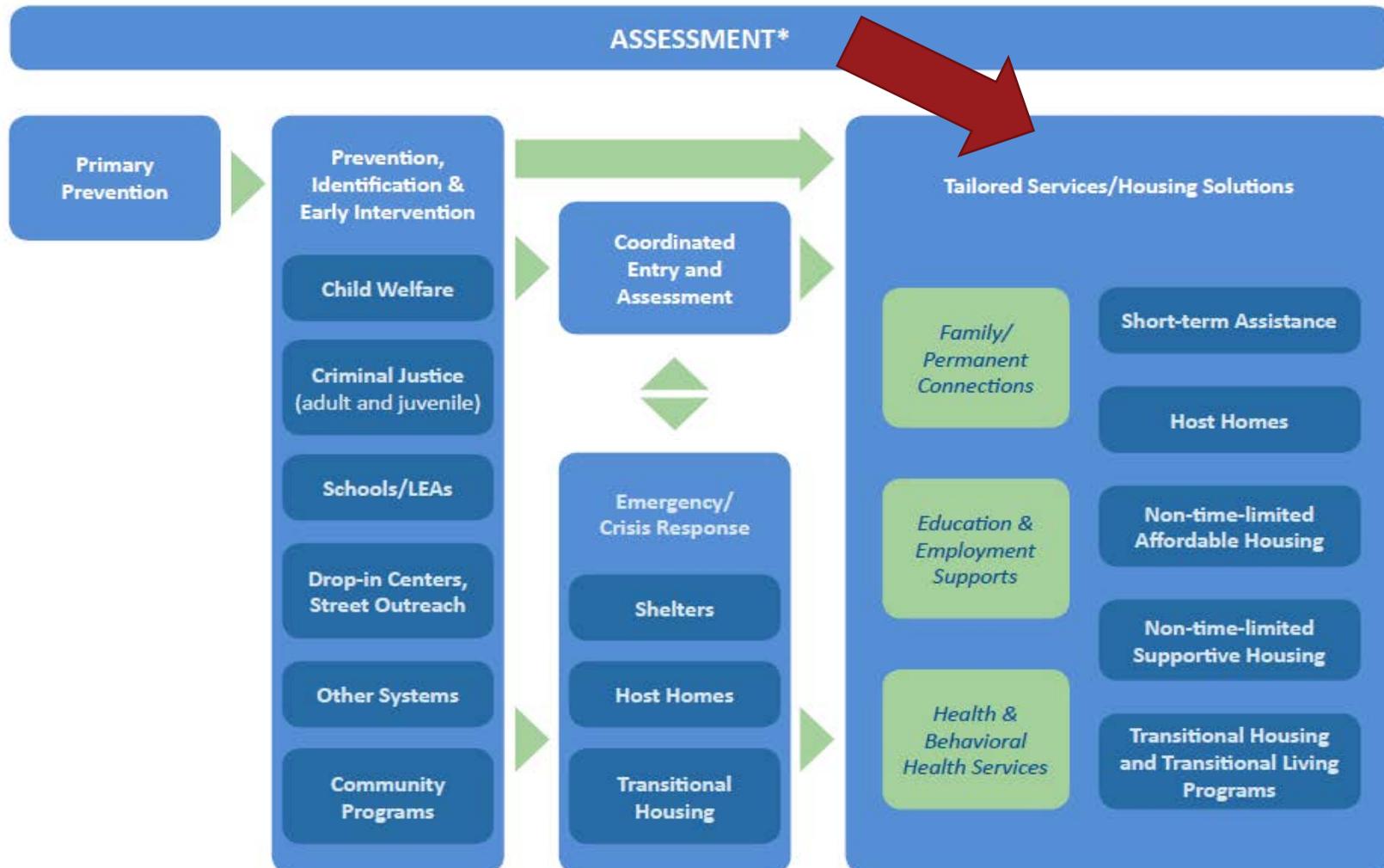
The Interagency Working Group on Ending Youth Homelessness has developed a shared vision for the community response that will be necessary to prevent and end youth homelessness, illustrated here and described in more detail below.



*\*Throughout the provision of services, assessment will be ongoing*



# Vision for coordinated and comprehensive community response to prevent and end youth homelessness



\*Throughout the provision of services, assessment will be ongoing.

# FAMILY UNIFICATION PROGRAM AND FAMILY SELF SUFFICIENCY PROGRAM DEMONSTRATION

Presenters:

**Ryan Jones**

Housing Program Specialist  
Office of Public and Indian Housing  
HUD

**Amaris Rodriguez**

Housing Program Specialist  
Office of Public and Indian Housing  
HUD

# GOALS OF SESSION

- Housing Choice Voucher Program
- Family Unification Program
- Demonstration Outline
- Family Self Sufficiency Program

# HOUSING CHOICE VOUCHER PROGRAM

- The Housing Choice Voucher (HCV) program is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing.
- Public housing agencies (PHAs) receive federal funds from HUD to administer the program.
- Participants use the rental assistance to find housing in the private market.

# HOUSING CHOICE VOUCHER PROGRAM

- Tenant-based rental assistance.
- Income eligibility: Generally, a family's income must be within the "very low income" limits which are set at 50% of the area median income (AMI).
- Participant generally pays 30% of the family's monthly adjusted income.
- PHA pays the owner the lower of the payment standard for the family minus the TTP; or the rent and utility allowance (gross rent) minus the TTP.

# HOUSING CHOICE VOUCHER PROGRAM - PROCESS

- Household applies to the PHA's waiting list.
- PHA selects the household from its waiting list and determines the household's eligibility for the program (e.g., income, criminal history).
- PHA briefs the household about the program and issues the household a voucher to begin searching for a suitable unit.
- Household finds a unit.

# HOUSING CHOICE VOUCHER PROGRAM – PROCESS (CONTINUED)

- The PHA approves the unit if it passes unit inspection and the rent is determined reasonable.
- PHA calculates the housing assistance payment (HAP) and household's share towards rent.
- PHA executes the HAP contract with the landlord. The household and landlord execute a lease agreement.
- The household moves-in.

# FAMILY UNIFICATION PROGRAM

- Special purpose HCV rental assistance program administered by PHAs in partnership with Public Child Welfare Agencies (PCWAs) for eligible families and youth.
- Funding allocated through a competitive process.
- Administered in accordance with HCV program requirements.
- FUP Notice of Funding Availability (NOFA) issued by HUD provides specific program information and requirements.
- Not all PHAs administer FUP.

# FAMILY UNIFICATION PROGRAM

- Two eligible populations:
  - 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, or
    - The delay in the discharge of the child or children to the family from out-of-home care.
  - Youth at least 18 years old and not more than 21 years old who left foster care at age 16 or older and who lack adequate housing.
    - Homeless
    - Displaced by domestic violence
    - Living in substandard or dilapidated housing
    - Imminent danger of losing housing
    - Living in overcrowded unit
    - Living in housing not accessible to the youth or the youth's disabled child or children
- FUP youth limited to 18 months of assistance.

# PCWA AND PHA RESPONSIBILITIES

- PCWA determines if the family or youth meets the FUP eligibility requirements and certifies and refers to PHA.
- PHA places the FUP applicant on its HCV waiting list and determines whether family or youth meets HCV program eligibility requirements.
- PHA conducts all other processes relating to voucher issuance and administration.
- PCWA provides supportive services to FUP youth for 18 months in which the youth participates in the program.

# FAMILY UNIFICATION PROGRAM AND FAMILY SELF SUFFICIENCY DEMONSTRATION

- Authorized by HUD's FY 2015 Appropriations.
- Implemented through Notice PIH 2016-01
- Demonstration testing the effectiveness of combining housing assistance for eligible youth lacking adequate housing under FUP with the assistance under the Family Self Sufficiency (FSS) program.
- **Extends the 18-month time limit on rental assistance to the length of the FSS contract.**
- Does not include an allocation of new FUP Vouchers.
- PCWA requirements remain unchanged under demonstration.
- HUD required to monitor and evaluate the demonstration.

# DEMONSTRATION GOALS

- Provide housing stability for youth aging out of foster care.
- Expand opportunities to become self-sufficient and transition to independent living and adulthood.
- Increase access to FUP for youth.
- Strengthen PCWA/PHA partnerships
- Increase coordination with community efforts to establish and operationalize a coordinated assessment system.
- Build knowledge base of promising practices.

## DEMO ELIGIBILITY - PHA

- PHA must administer both FUP and an FSS program.
- PHA must be in compliance with all applicable civil rights statutes and regulations.
- PHA Executive Director must submit a written request to participate in the demonstration co-signed by PCWA Executive Director and include supplemental information.
- By submitting a request to participate, PHA is agreeing to participate in an evaluation of the demonstration

# DEMO ELIGIBILITY - PHA

- PHA policy changes in support of this demonstration must be adopted in the PHA's HCV program administrative plan.
- Where changes to PHA policies are significant amendments to the PHA's Annual Plan, the PHA must comply with the amendment provisions including soliciting public comment and consulting with the resident advisory board.
- The FSS action plan must be amended.
- PHA must take appropriate steps to ensure effective communication with FUP applicants, FUP participants, and members of the public with disabilities, including during outreach, recruitment, enrollment, and trainings.

## DEMO ELIGIBILITY- YOUTH

- Has a FUP voucher
- Agrees to sign an FSS Contract of Participation (Form HUD-52650)
- Comply with program rules, lease requirements, and terms and conditions of the FSS Contract of Participation.

# DEMONSTRATION OUTLINE

- Open to program participants with a FUP youth voucher.
- Current FUP youth must be given the opportunity to participate.
- FUP participant is afforded the full length of the FSS Contract of Participation.
- Participating PHAs must review the availability of this demonstration with all FUP youth during the family briefing.

# BENEFITS OF PHA AND PCWA PARTICIPATION

- PHAs must already serve any referrals (youth or families) that meet all program eligibility requirements.
- Excellent tool for easing the transition to adulthood for youth leaving foster care.
- Provides a longer term of housing assistance to the youth to become self sufficient and transition to independent living and adulthood.

# BENEFITS OF PHA AND PCWA PARTICIPATION

- Reduction in turnover rates.
- 12-month lease renewals.
- Provides an opportunity for PHAs and PCWAs to expand on their existing relationship to develop policies, and align and leverage resources.

# BENEFITS OF YOUTH PARTICIPATION

- **Provides a longer term of housing assistance to the youth to become self sufficient and transition to independent living and adulthood.**
- FSS program.
- Easier to find a home with 12-month lease renewals.

# PRIORITIZING PARTICIPANTS

- PHA can assign a specific number or percentage of FUP vouchers for youths.
- PHAs who have an FSS waiting list may establish a selection preference for up to 50% of their FSS slots. FUP youth who are participating in services (or on the waiting list for such services) may qualify for such a preference.
- Participating in PCWA services or on the waiting list for the services may be considered eligible for the preference.

# HOW TO PARTICIPATE

- PHA must submit a written request to participate.
- Signed by PHA Executive Director and PCWA Executive Director
- Submitted electronically to [FUPvouchers@hud.gov](mailto:FUPvouchers@hud.gov), copying local HUD Office of Public Housing.
- Request must include:
  - Copy of the MOU with the PCWA(s) to serve the target population;
  - Brief narratives sufficient to demonstrate:
    - Capacity to serve the target population, including outreach and engagement, a description of plans for coordinating case management and services provided by the PCWA with those provided through FSS, and voucher utilization.
    - Success of the PHA's existing FSS program in serving residents.
    - Partnerships, or intent to establish a partnership with local organizations that serve homeless youth, including but not limited to participants in the CoC.

# HUD REVIEW

- Review of a PHA's request will be conducted by staff of the Office of Housing Choice Vouchers Management and Operations Division (MOD).
- Verify PHA administers both FUP and an FSS program.
- Verify inclusion of the elements in Section 11 of the Notice.
- PHA will be notified via email if it is not eligible or the request does not include the required elements.
- HUD will notify the PHA of its approval to participate via email within 30 days.
- **Deadline to apply: July 15, 2016**

# EVALUATION

- All communities/PHAs that choose to participate in the demonstration will be required to be part of the evaluation.
- HUD is committed to ensuring that the burden that this places on participating PHAs is kept to a minimum.
- The research plan includes:
  - Descriptive analysis of administrative data (PIC) to examine the demonstration program participants and their engagement with both the FUP program and the FSS program
  - Qualitative analysis of the program implementation.
  - The study will utilize a variety of data sources including HUD administrative data and primary data sources (interviews with PHA staff and, if feasible, interviews or focus groups with a sample of youth enrolled in the demonstration).
  - Anticipate beginning data collection at the start of the FUP and FSS demonstration project.

# EVALUATION

- Key research questions will include:
  - What are the characteristics of the PHAs that chose to participate in the demonstration program?
  - What challenges and/or barriers did the PHAs encounter during the implementation phase of the demonstration program?
  - Are there differences among the FUP youth who enroll in the demonstration program versus those who choose not to?
  - What can we learn about the youth who enroll in the demonstration program, and the benefits of their program participation?
- Once the cohort of participating demonstration PHAs has been established, HUD will host a webinar to walk the PHAs and their community partners through the evaluation details, monitoring and evaluation component.

# Overview of HUD's FSS Program

- FSS is an employment and savings incentive program that enables HUD assisted families to increase their earned income and reduce their dependency on welfare assistance and rental subsidies.
- There are three key features to the FSS program:
  - A financial incentive in the form of an escrow account.
  - Coaching/case management.
  - Stable housing through rental subsidies.

# Overview of HUD's FSS Program

- HUD funding is provided to cover the salaries of FSS coordinators.
  - PHAs may administer the program in-house, or may contract with an appropriate organization to administer the PHA's FSS program.
- During the most recent funding year, HUD funded just over 700 PHAs/TDHEs and over 1,300 FSS coordinators.
- PHAs may administer FSS programs without HUD funding.

# Overview of HUD's FSS Program

- FSS is available to HCV families, public housing (PH) residents, Native American Housing Assistance and Self-Determination Act (NAHASDA)-assisted residents, and, recently, project based rental assistance (PBRA) residents.
- The majority of current FSS participants are HCV families, at approximately 80% of the FSS participant pool (71,000+).
- Participation in FSS is voluntary.

# Overview of HUD's FSS Program

- The FSS program is administered locally by PHAs in collaboration with a Program Coordinating Committee (PCC).
- The role of the PCC is to assist the PHA in:
  - Developing the FSS policy framework (the FSS action plan) and operating procedures.
  - Identifying service gaps and securing service commitments from public and private resources.

# Overview of HUD's FSS Program

- The PCC is made up of an array of organizations and the composition may vary by PHA.
- Some of the most common PCC partners include:
  - Workforce Investment Boards
  - Financial Literacy and Credit Counseling Providers
  - City or County Government
  - City or County Human Services/TANF Agency
  - City or County Departments of Health and Mental Health
  - Community and/or 4-Year Colleges

# Overview of HUD's FSS Program

- PHAs are also responsible for developing outreach strategies for recruitment of FSS participants.
- PHAs also determine the FSS selection procedures.
  - Is there a need for an FSS waiting list?
  - Will the PHA establish a selection preference?
  - What type of objective system will be used to fill the FSS slots?
  - Will the PHA screen for motivation?
- Depending on the level of engagement, PHAs may have established an FSS waiting list.

# Overview of HUD's FSS Program

- Motivation may be used as a screening tool by PHAs. Motivational screening is used to assess a family's interest and willingness to undertake the responsibilities of the FSS program.
- Motivational screening may not be used to screen participants based on their educational level, previous job history or job performance, or on factors that may result in discriminatory practices, among others.
- Any required tasks must be accessible to all potential applicants, including persons with disabilities and those with limited English proficiency.

# Overview of HUD's FSS Program

- Once an eligible family is selected for FSS, the PHA and the head of household of each participating family execute an FSS Contract of Participation (CoP).
- The term of the CoP is generally 5 years, but it may be extended for another 2 years by the PHA for good cause.

# Overview of HUD's FSS Program

- The CoP specifies the rights and responsibilities of the family and the PHA.
- Termination (or exit) from the FSS program may not result in termination from the applicable rental assistance program.

# Overview of HUD's FSS Program

- The CoP also incorporates the family's individual training and services plan (ITSP).
- The ITSP is the document that records the plan for the family. That is, the series of intermediate and long-term goals and the steps the family needs to take – and the services and resources they may need to access – to achieve those goals.

# Overview of HUD's FSS Program

- There are only two required goals:
  - Employment – head of household only
  - Welfare-free for 12 months
- All other goals are established as a collaborative effort between the family and the PHA.
- An ITSP is created for the head of the FSS household and each family member who elects to participate in the program.

# Overview of HUD's FSS Program

- Some of the services coordinated through the program include: child care, transportation, education, job training, employment counseling, financial literacy, and homeownership counseling.
- Services are generally not provided by the PHA, but rather outsourced to service providers in the community.

# Overview of HUD's FSS Program

- An interest-bearing escrow account is established by the PHA for each participating family.
- An FSS participant begins to build escrowed savings once he or she experiences an increase in earnings that triggers an increase in the participant's total monthly payment toward rent.

# Overview of HUD's FSS Program

- Once a family graduates from the program, they may access the escrow and use it for any purpose.
- The average escrow at program completion is \$6,500.

# Overview of HUD's FSS Program

- PHAs may also allow for interim disbursements of escrow during the family's participation in FSS. Such interim disbursements are for purposes consistent with the CoP. For example, completion of higher education or job training, or start-up expenses of a small business.

# Overview of HUD's FSS Program

- FSS outcomes (based on FY2015 PIC data):
  - Over 71,000 households actively participated in the program.
  - 4,245 families successfully completed their FSS contracts and graduated.
  - 100 percent of graduating families did not require temporary cash assistance (TANF/welfare). This is a requisite of graduating from the program.

# Overview of HUD's FSS Program

- FSS outcomes (based on FY2015 PIC data):
  - 52% of graduates have escrow savings, at an average of approximately \$6,500.
  - 1625 participants (36% of graduates) exited rental assistance within one year of leaving the program.
  - 504 (11.76%) participating families went on to purchase a home.

# FUP/FSS DEMO

- FSS program success narrative: PHAs must submit a narrative describing the success of their FSS program.
  - PHAs may wish to review and follow HUD reported outcomes as shown in Congressional Justifications.
- PHAs may also wish to consider the following elements in demonstrating the success of their FSS program:
  - Earnings growth
  - Graduation rates
  - Interim milestones
  - Leveraging funds

# FUP/FSS DEMO

- FSS action plan:

- Must be updated to incorporate policies specific to the demonstration and submitted to [FUPVouchers@hud.gov](mailto:FUPVouchers@hud.gov) and to the HUD field office for review.
- Submission of updates to the FSS action plan is not required as part of the application but must be submitted prior to program implementation.

# FUP/FSS DEMO

## ○ FSS action plan:

- Updates must be made in the following areas: FUP youth outreach and notification, FUP youth requirements and expectations, and termination policies.
- PHAs should assess the need to amend the action plan in the following areas: interim disbursement of escrow, motivation as a selection factor, FSS program size, FSS family selection procedures.

# FUP/FSS DEMO

- For purposes of the FUP/FSS demonstration, termination (or exit) from the FSS program will result in termination from the FUP youth program where the 18-month FUP youth voucher time limit has ended.
- PHAs must review this with the FUP youth at the time the CoP is signed.

## FURTHER INFORMATION

- Questions concerning FUP and this demo – [FUPvouchers@hud.gov](mailto:FUPvouchers@hud.gov)
- Questions concerning FSS – [FSS@hud.gov](mailto:FSS@hud.gov)
- Notice PIH 2016-1 - <http://portal.hud.gov/hudportal/documents/huddoc?id=pih2016-01.pdf>
- FUP Webpage - [http://portal.hud.gov/hudportal/HUD?src=/program\\_of\\_fices/public\\_indian\\_housing/programs/hcv/family](http://portal.hud.gov/hudportal/HUD?src=/program_of_fices/public_indian_housing/programs/hcv/family)
- FSS Webpage - [http://portal.hud.gov/hudportal/HUD?src=/program\\_of\\_fices/public\\_indian\\_housing/programs/hcv/fss](http://portal.hud.gov/hudportal/HUD?src=/program_of_fices/public_indian_housing/programs/hcv/fss)



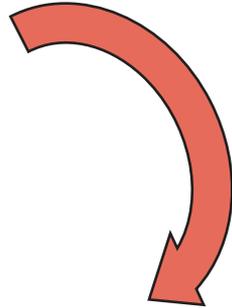
# How Communities Use FUP to Support Youth Who Aged Out of Foster Care

**Amy Dworsky**

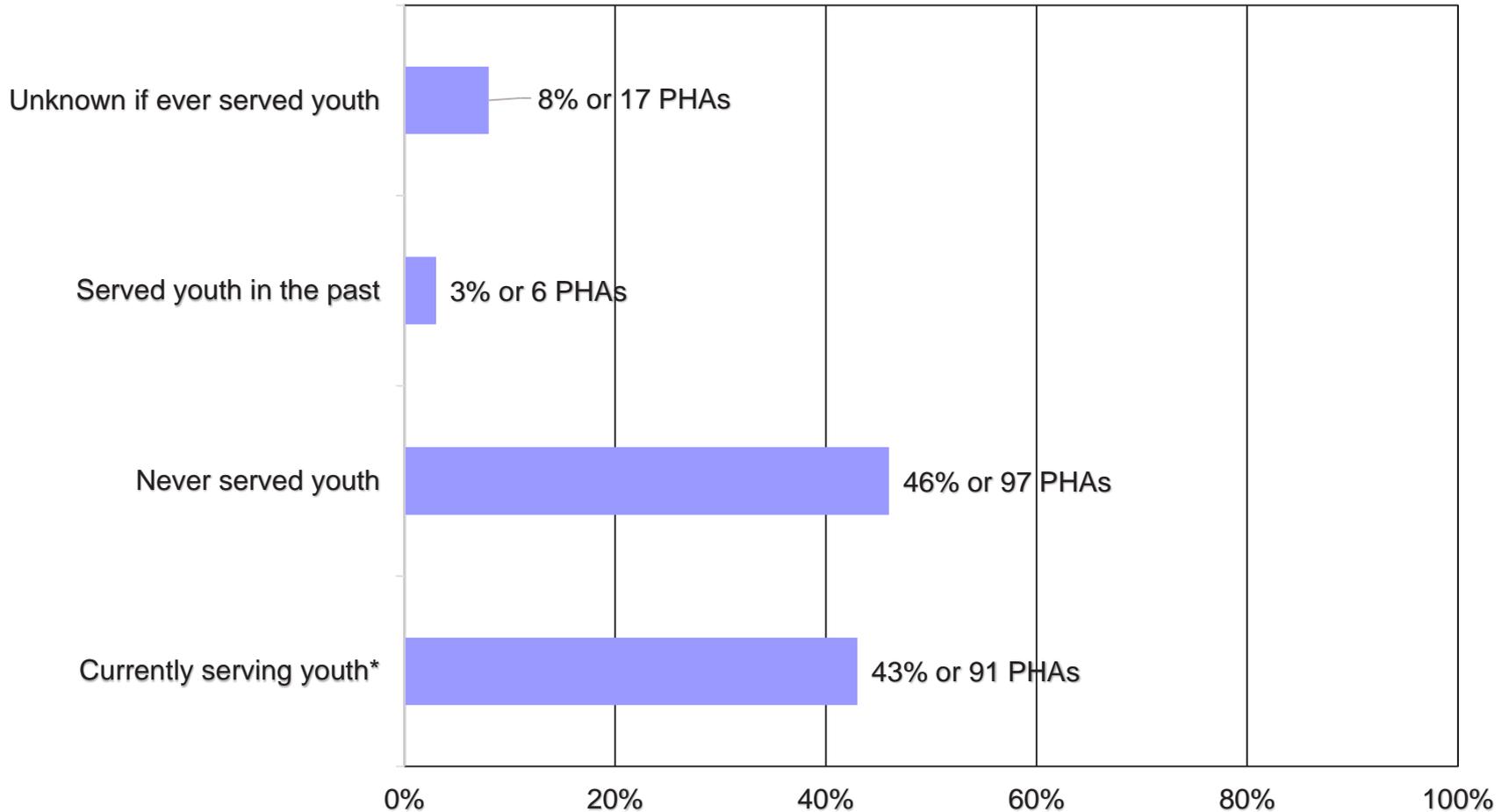
# Housing for Youth Aging Out of Foster Care: Project Overview

- Sponsored by HUD's Office of Policy Development & Research with assistance from DHHS
- Partnership between Mathematica Policy Research and Chapin Hall
- Key components
  - Literature review/program typology
  - Survey of Public Housing Agencies (PHAs) and their partner Public Child Welfare Agencies (PCWAs)
  - Site visits to communities using FUP to serve youth

# Survey of PHAs and PCWAs

- Fielded in fall 2012
  - Public Housing Agencies (PHAs)
    - 249 identified by HUD as operating a FUP
    - 211 provided usable data
  - Public Child Welfare Agencies (CWAs)
    - 82 identified by the PHAs that currently served youth
    - 73 provided usable data
- 

# PHAs Use of FUP for Youth



\*Served youth w/in the past 18 months

# Why Some PHAs Don't Serve Youth with FUP

- Main reason PHAs cite for not serving youth is a lack of referrals from PCWAs
  - 70% of PHAs reported that youth are not referred by PCWAs
  - Lack of referrals does not reflect lack of demand for housing
- 61% of PHAs would be more likely to serve youth if they had more vouchers

# Survey Topics

- Allocation of FUP vouchers to youth versus families
- Nature of the collaboration between PHA and PCWA
- Provision of supportive services by PHA and PCWA
- Perspectives on FUP related policies including time limit

# Site Visits to Communities Using FUP For Youth

- Visited four communities to better understand how FUP is used to serve youth
- Selected communities with
  - Relatively high number of youth referrals
  - High lease up rate ( $\geq 75\%$  of referred youth lease up)
  - Serving youth for at least 3 years
- Not necessarily representative of all FUP-for-youth communities
- Met with administrators and staff from PHAs and partner PCWAs and from community based organizations
- Focused on issues that surveys could not fully explore

# Site Visits to FUP-for-Youth Communities

<b>Jurisdiction</b>	<b>Site Visited</b>	<b>PHA</b>	<b>PCWA</b>
Massachusetts	Boston	Dept. of Housing & Community Development	Dept. of Children & Families
Colorado	Denver	Dept. of Local Affairs	Division of Child Welfare Services
Broward County	Fort Lauderdale	Broward County Housing Authority	ChildNet (Privatized Child Welfare)
Salt Lake County	Salt Lake City	Housing Authority of Salt Lake County	UT Division of Child & Family Services

# Youth with FUP Vouchers

- On average, youth-serving PHAs reported that they had 112 FUP vouchers and 29% of those FUP vouchers were leased up by youth
- 96% of youth-serving PHAs reported offering youth housing search assistance
- Two-thirds of youth-serving PHAs reported that 75% of youth issued a voucher successfully lease-up
- 42% of youth -serving PHAs reported that youth almost always keep their voucher for the full 18-months

# Strategies for Allocating Vouchers

- Serve eligible youth and families on a first-come, first served basis
  - Vouchers held by youth can be re-allocated to families after 18 months so the proportion allocated to youth can shrink over time
- Designate a fixed percentage (“set-aside”) for youth
  - “Set aside” vouchers re-allocated to other youth after 18 months
  - Only a third of youth-serving PHAs set aside vouchers for youth
- Decide who is served case-by-case
- Serving families may be a higher priority
  - About half of PCWAs refer only a portion of their FUP-eligible youth
  - Families may be perceived as having greater needs
  - Reduces PCWA caseloads through family preservation/reunification

# Targeting Subgroups of Youth

- Communities vary with respect to the criteria they use to select youth for FUP
- Some have no preferences and serve youth on a first come, first served basis
- Preference for youth focused on education and employment who are perceived as being motivated and the most likely to achieve self-sufficiency in 18 months
- Preference for youth likely to engage in supportive services, or
- Preference for pregnant or parenting youth

# Providing Supportive Services

- Cost of providing supportive services borne by PCWAs
- To cover costs, PCWAs use a combination of funding sources
  - Chafee dollars (60%)
  - State dollars (64%)
  - Other resources (41%)
- 40% of PCWAs identified cost of services as a challenge because Chafee funding already stretched thin
- Some youth reluctant to remain engaged with the child welfare system
- Partnerships with CBOs, foundations, and other public agencies essential to engaging youth

# Time Limits on Vouchers for Youth

- Agreement that FUP should be time-limited to prevent youth dependency and agency complacency AND that the limit should be extended beyond 18 months (to at least 24 months)
  - Reduces housing options after the first year due to misalignment with typical 12-month lease term
  - Unrealistic to expect self-sufficiency within 18 months
  - Not enough time to earn a two-year degree
  - Frequent turnover of vouchers creates administrative burden
    - 46% of PCWAs and 41% of PHAs identified the time limit as major challenge
    - 30% of PHAs reported being more likely to serve youth if the time limit were eliminated
- Use of Moving to Work funds to extend housing subsidy beyond 18 months to youth who are in school and working at least part-time

# Implications for Policy and Practice

- Effective implementation of FUP requires that decisions regarding distribution of vouchers between families and youth and which youth to target should be made jointly and up front by PHAs and PCWAs
- Strategic partnerships with CBOs can expand resources and increase youth participation in supportive services
- Requiring set-asides would ensure that some minimum number of vouchers are being used by youth

# Questions?

(Please type into the box on the right.)

