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OFFICE OF CHILDREN, YOUTH AND BULLETIN

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE**

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SUBJECT: Youth Independent Living Services Guidelines	BY: Richard J. Gold Deputy Secretary for Children, Youth and Families
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SCOPE: COUNTY CHILDREN AND YOUTH SOCIAL SERVICE AGENCIES
COUNTY CHILDREN AND YOUTH ADVISORY COMMITTEES
COUNTY CHILDREN AND YOUTH FISCAL OFFICERS
COUNTY CHIEF JUVENILE PROBATION OFFICERS
PRIVATE CHILDREN AND YOUTH SOCIAL SERVICE AGENCIES
JUVENILE COURT JUDGES COMMISSION
JUVENILE COURT JUDGES
ORPHANS COURT JUDGES
JUVENILE LAW CENTER

PURPOSE:
The purpose of this bulletin is to transmit guidelines and requirements for the successful development and implementation of Youth Independent Living (IL) services through County Children and Youth Agencies (CCYA) and their contracted service providers.

BACKGROUND:
Beginning in 1997, Congress passed, and the President signed into law, four significant pieces of legislation related to children in substitute care. The first, the Adoption and Safe Families Act of 1997 (ASFA), focuses on safety, permanency, and well-being for all children. The second, the Foster Care Independence Act of 1999 (FCIA), focuses on services for youth aging out of the substitute care system, while the third, the Fostering Connections to Success and Increasing Adoptions Act of 2008 (Fostering Connections), focuses on transition planning, educational stability and programming that provides significant opportunities for states and creates important mandates and options that may require changes in state law and practice.

COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO: OCYF Regional Directors
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Finally, the fourth, the Patient Protection and Affordable Care Act of 2010 (PPACA), which provides for information and education about the importance of having care power of attorney or health care proxy and to provide the youth with the option to execute such a document.

The passage of ASFA, FCIA ,Fostering Connections and PPACA requires all states to examine existing programs and philosophies regarding permanency planning and the future of IL programming and their relation to the overall continuum of child welfare services. To meet this requirement the Department of Public Welfare (DPW) has convened several workgroups and has issued several bulletins providing guidance pertaining to the implications of such legislation.

DISCUSSION:

Included with this bulletin is a compendium of resources titled: Independent Living Services Bulletin: Frequently Asked Questions and Recommendations for implementation (Appendix A.)

1. Eligibility

IL services are provided to youth involved with CCYA utilizing a combination of federal Chafee Foster Care Independence Program (CFCIP) funds, State and local funds. CCYA are required to identify youth who are likely to remain in foster care until age 18 and to:

- help them make the transition to self-sufficiency by providing services such as assistance in obtaining a high school diploma, career exploration, vocational training, job placement and retention, training in daily living skills, training in budgeting and financial management skills, substance abuse prevention, and preventive health activities (including smoking avoidance, nutrition education, and pregnancy prevention);
- help them receive the education, training and services necessary to obtain employment;
- help them prepare for and enter post secondary training and education institutions;
- provide personal and emotional support to youth aging out of foster care, through mentors and the promotion of interactions with dedicated adults; and
- provide financial, housing, counseling, employment, education and other appropriate support and services to former foster care recipients between 18 and 21 years of age to complement their own efforts to achieve self-sufficiency and to assure that program participants recognize and accept their personal responsibility for preparing for and then making the transition from adolescence to adulthood.

CCYA can provide IL services to many subgroups of youth who are under age 21, including youth who are under age 16¹, youth who are returned home or placed with relatives, and any delinquent youth. State and local funds may be used to pay for IL services for youth excluded from CFCIP eligibility.

¹ CCYA may provide IL services to youth under 16 with an approved request to OCYF.

The following table identifies youth who may receive IL services and their eligibility for CFCIP funds. In general a youth must be younger than 21 years old at the beginning of the State fiscal year and:

YOUTH STATUS and ELIGIBILITY	CFCIP Funds	State/Local Funds
Be in, or have been in, out-of-home placement on or after age 16, including youth adopted or entering permanent legal custodianship arrangements after age 16 and:	✓	✓
Have been adjudicated dependent; or	✓	✓
Have been dually adjudicated dependent and delinquent; or	✓	✓
Have been adjudicated delinquent with shared case responsibility between the CCYA and the Juvenile Probation Office (JPO); or	✓	✓
Have been adjudicated delinquent only; or		✓
Is a pre-adoptive and adoptive youth; or	✓	✓
Is a qualified alien child; or	✓	✓
Is an undocumented alien child or alien child legally admitted on a temporary basis for work, study or pleasure; or		✓
Is a youth with special needs.	✓	✓
Youth not in, or never in, out-of-home care and with, or without special needs, may be provided IL services with state and/or local funds.		✓

Out-of-County/State Foster Care Youth – Youth who are placed out-of-county/state must be provided IL services. The provision of these services is the responsibility of the CCYA to whom the youth is committed. The sending CCYA can directly provide or arrange for the provision of these services by the receiving county/state agency or private provider, but the responsibility ultimately falls on the sending CCYA.

Out-of-County/State Former Foster Care Youth – Youth formerly in the child welfare system remain eligible for IL services up to age 21 through the county/state in which the youth now resides.

2. Identifying Youth Most Likely to Remain in Care

CCYA should establish written criteria to be used to determine if a child is most likely to remain in care until age 18. These criteria must be fair, objective, equitable and applied ‘across-the-board’. Once the determination is made that a youth is most likely to remain in care until age 18, the youth should be given priority for receiving IL services regardless of race, sex, educational level or disability.

3. Permanency Requirements

The following hierarchy of permanency goals applies to children of all ages including youth eligible for IL services:

- Reunification;
- Adoption;
- Permanent legal custodianship;
- Placement with a fit and willing relative; and
- Another planned permanent living arrangement (APPLA).

APPLA is the least preferred permanency option and can only be ordered by the court after findings are made that compelling reasons exist to rule out all other preferred permanency goals. APPLA should only be used in rare situations. APPLA is a living arrangement that is planned and permanent in nature. The arrangement is intended, designed, considered, premeditated, or deliberate, enduring, lasting, or stable. The term 'living arrangement' includes not only the physical placement of the child, but also the quality of care, supervision, and nurturing the child will receive. The agency must work with youth with a goal of APPLA to ensure that they have permanent relationships with a life-long connection and are provided with appropriate services to meet their needs. The decision and development of a plan to implement the goal of APPLA should include an agreement and understanding among all parties including the following:

- Parent(s);
- Youth;
- Placement provider;
- Service worker;
- Guardian ad litem; and
- Court.

4. Placement Settings and their Relationship to the Achievement of Permanency

All youth should be placed in the least restrictive, age appropriate, most family-like setting taking into account the youth's community, educational, personal and familial connections. Regardless of placement setting, youth's preparation for independence should occur in the placement setting as well as through formal and informal IL instruction. This preparation means not only should the caretaker provide IL skills instruction, such as cooking, laundry tasks and budgeting, but also set and maintain rules consistent with the youth's age and development.

In many cases, placement settings designed specifically for young adults can be very effective in developing responsibility and IL skills. Youth learn best through experiential and supportive learning. To meet the needs of all youth, CCYA should have a continuum of placement types available. CCYA are encouraged to create or utilize programming and placement settings that prepare youth for the realities of adult living and decrease the number of youth in congregate and institutional care.

For more information, see Appendix C: Transitional and Supportive Housing Options for Youth.

Transitional Living Placement (TLP) (see Appendix C)

A TLP is a less restrictive placement setting for dependent or delinquent youth, and is a home or living unit for fewer than five children, who are 16 years of age or older, with or without their own children who are able to live in a semi-independent living setting. A child's own children are counted towards the maximum number of four children allowed per TLP. The intent of a TLP placement is to provide youth with the opportunity to learn and practice life skills while receiving consistent, but not constant, supervision and guidance. The Title 55 Pa. Code, Chapter 3800 regulations (relating to Child Residential and Day Treatment Facilities) exempt TLP's from some of the requirements for residential settings in terms of supervision and staff-to-youth ratio. These exemptions reflect the age-appropriate design of the program and allow youth to receive supportive services and case management. Clarification on the reimbursement rates for TLP placements can be obtained by contacting the OCYF regional office.

Supervised IL (SIL)

SIL is a less restrictive placement setting for dependent/delinquent youth who live in a single residence or unit. The intent of an SIL placement is to provide youth with the opportunity to put into practice the life skills they have learned leading to permanent housing upon discharge from CCYA custody. SIL services are provided to youth via scattered site arrangements and youth are assisted in finding apartments in the community. In most cases, the agency providing SIL enters into a lease with a landlord and the youth is placed in the apartment. While youth do not receive 24-hour supervision, they are able to reach an agency staff person at any time. Per Fostering Connections, SIL will be classified as federally-defined foster care, effective October 1, 2010, and will, therefore, be eligible for federal placement maintenance payments when the youth residing in the SIL meets all of the following requirements:

- be determined IV-E eligible;
- be 18 years old; and
- be in full time secondary schooling or full time training (i.e. GED, vocational training) and expected to complete the schooling or training before turning age 19.

Clarification on the reimbursement rates for SIL placements can be obtained by contacting the OCYF regional office.

Room and Board (see Section H, page 17)

Room and board services can be provided to youth who have aged out or emancipated from substitute care on or after age 18, up to age 21, using CFCIP funds. Room and board services can also be provided to those youth who do not meet the CFCIP eligibility by using State and local funds only. This support includes payment or reimbursements for shelter, food, rent, security deposits, utilities, furniture, household items and other start up expenses that may be incurred in the youth's living situation.

5. Age Appropriate Rules, Roles, and Responsibilities

Efforts to apply age-appropriate rules, roles and responsibilities are essential to the successes and ongoing development of youth most likely to remain in care until age 18. Agencies and caregivers may need to re-examine existing policies, as well as perceptions or beliefs, to remove barriers in order to facilitate healthy and safe transitions to independence. Overall, agencies should encourage rules, roles, and responsibilities which allow for the greatest amount of freedom possible in order to provide learning opportunities to prepare youth for self-sufficiency. As examples: after-school activities, driver's education, age-appropriate curfews, access to household appliances, prom attendance and other rites of passage should be allowed and encouraged.

For more information, see Appendix D: Sample Drivers Permit and Licensing Policy

6. Statewide Adoption and Permanency Network (SWAN) Services

Permanency services through SWAN are available for all youth in substitute care, regardless of their court-ordered permanency goal. Youth in the custody of CCYA, including those who do not have a goal of adoption, are eligible to receive child profile, child preparation, family profile and child specific recruitment services. SWAN services can connect older youth with a caring adult who may become a permanent placement resource or, at least, a permanent connection to assist them as they prepare for the transition to independence.

For more information, see Appendix E: SWAN Units of Service

7. Coordination and Collaboration

The success of IL services is dependent upon collaboration, involvement and support of other community and governmental agencies, programs and schools, as well as resource families and other placement provider staff where youth receiving IL services are residing. Education and training, substance abuse and other prevention services, job readiness and the ability to access employment and housing are all critical to the successful transition of youth from placement to independence. To insure effective coordination and delivery of these services, it will be equally critical to develop cooperative and collaborative relationships between the CCYA and other service providing systems.

For more information, see Appendix F: Statewide Practices Available for Older Youth

8. Serving Youth with Disabilities

Numerous studies indicate significant numbers of youth in substitute care have or are at risk for acute, chronic or disabling physical or mental health conditions. Youth may not be excluded from the provision of IL services because it is believed they cannot benefit from such services if they are not likely to obtain full independence. Federal and Commonwealth statutes require that CCYA ensure that children of various ages and at various stages of development, regardless of disability, receive necessary services. Services must be developed and provided in ways that address the multiple needs and learning styles of participants. Therefore, information, materials and service delivery should be tailored to the needs and abilities of the individual.

Interagency coordination and cross-systems collaboration are essential to ensure that youth with special needs are assessed and provided appropriate IL services. These goals can be accomplished by coordinating the varying services and plans to which youth with disabilities are entitled, and by ensuring that services are designed to compliment and not conflict with one another. These plans and services may include, but are not limited to, an Individualized Education Plan (IEP), services available through the Local Educational Agencies (LEA), an Individualized Plan for Employment and services through the Office of Vocational Rehabilitation (OVR). Therefore, it is recommended that transition planning teams create a seamless plan of service delivery with designated areas of responsibility provided by schools, CCYA, health care providers, OVR and all child and youth serving systems.

For more information, see Appendix G: Resources for Youth with Disabilities

POLICY AND PROCEDURES:

Provision of Services

The Department recognizes the need to provide appropriate IL services to accommodate youth with varying permanency goals, developmental levels and living arrangements. All youth in substitute care, including those with special needs and disabilities, must be provided with IL services. In particular, CCYA must ensure that older youth placed in residential treatment facilities receive IL services, either by providing the services directly, or by ensuring that the services are provided.

The Department also recognizes the need to prioritize the utilization of funds to provide mandated services for those youth most likely to remain in care until age 18, as specified by FCIA. Moreover, these guidelines require CCYA to provide all services to address a youth's needs regardless of the amount of CFCIP funds available.

To accomplish the goals of providing a wide array of services for all youth, and to prioritize funding for those youth most likely to remain in care until age 18, CCYA should deliver IL services according to the youth's individual needs. IL services should be provided through informal and formal methods. It is especially important that informal IL services be incorporated into a youth's daily living routine regardless of the type of placement. CCYA should include contract language, when developing agreements with private providers, to ensure that daily care providers and foster parents are providing IL instruction to youth in the placement setting.

For example, a youth residing in a foster home should receive guidance from his or her foster parents in learning basic life skills through informal instruction, such as cooking, laundry, and budgeting. Prioritizing the use of CFCIP grant funds based on need does not eliminate the CCYA's responsibility to provide IL services for all youth in care age 16 and older.

CCYA should follow the guidelines established in this bulletin for youth in substitute care, and youth receiving in-home services, who are determined to be in need of IL services. These guidelines should be used universally, not only for youth eligible for CFCIP funds. CCYA must provide, at a minimum, the following IL services: 1) referral for assessment, 2) assessment, 3) planning of IL services for each youth, 4) provision of

IL services for each youth, 5) transition planning and 6) aftercare services (see page 21.)

IL Services Coordinator

CCYA must designate an IL Services Coordinator who will be responsible to ensure that the agency, staff, courts and contracted providers meet the requirements of this bulletin and the National Youth in Transition Database (NYTD) and to make available timely services designed to achieve positive outcomes for youth. The IL Services Coordinator may have other tasks and responsibilities in addition to this role. The IL Services Coordinator will serve in the capacities to include, but not be limited to, the following:

- Serving as contact person for OCYF and it's training, support and technical assistance providers;
- Serving as primary contact for the agency to provide internal and external training, support and assistance;
- Cooperating with OCYF in a timely manner to assist with youth eligibility determinations for the ETG program, as necessary;
- Coordinating with OCYF and it's contracted NYTD provider to meet the requirements for the NYTD data collection and submissions;
- Having knowledge of, and participating in, the CCYA development and implementation of the IL Services Grant development to identify and design services and supports for improved outcomes of youth served by the CCYA.

Referral for Assessment

Youth in substitute care must have their IL needs assessed to identify the appropriate services within a minimum of 45 days of turning age 16. A referral for a SWAN child profile unit of service is also recommended to provide a continuum of services to promote reunification, adoption, permanent legal custodianship, and informal (non-legal) permanent connections. A delayed referral should not inhibit the administration of the needs-assessment tool.

The IL Planning Process and Documentation

Federal and State laws require that an IL Plan be included in the Child's Permanency Plan (CPP) for every youth who is age 16 or older. CCYA may also develop an IL plan for youth under age 16.

The IL Plan must be developed with input of the youth and based upon the results of the needs-assessment. At a minimum, a plan must include goals and services in the following domains: life skills, prevention services, education and training, employment, support, housing, health/mental health, or documentation in the plan that indicates why the domain area is not addressed and anticipated date of inclusion into the plan. The plan must also document how the youth was engaged in the planning process.

In addition to those items required to be maintained in all child records, the following items must also be maintained in the case records of youth receiving IL services:

- The referral to assess the youth's needs and other referrals such as the child profile unit of service;
- The results of the needs assessment;
- The CPP which includes the IL Plan;
- The Transition Plan;

- The Aftercare Plan for youth who have exited agency substitute care;
- Copies of all stipend, room and board and aftercare policies, signed notifications to youth, and copies of stipend and room and board payments processed by the agency;
- The youth's address and contact information;
- Family/tribal contact information;
- Immigration documents;
- Copies of the birth certificate, driver's license, State-issued photo identification card or passport;
- Social Security Card;
- Documentation that the youth was notified that they may request the court to remain in care until age 21 if continuing in a course of instruction or treatment; and
- Documentation of a youth's request for discharge at 18.

The following items are also recommended to be included in the case record for youth receiving IL services:

- Selective Service information;
- Additional or alternative contact information such as e-mail address, cell phone numbers and phone number of person(s) with whom the youth will remain involved;
- Progress reports;
- Specific educational information such as General Educational Development (GED) pre-test and final results, educational and vocational planning materials and letters; and workbook assignments and tests;
- Chafee ETG information and application;
- A copy of the youth's credit report; and
- Youth reporting forms for PA IL Outcomes Tracking System (PILOTS).

For more information, see Appendix H: Sample IL Plan

Transition Needs

The IL Plan included in the youth's CPP should address permanency goals, as well as IL services received prior to age 18, or older, if the youth elects to remain in care after age 18. These goals should include a discussion of the youth's future living situation and personal goals upon discharge.

Transition Planning

Fostering Connections requires that during the 90-day period immediately prior to the date the child will discharge from the child welfare system at age 18 or older, the CCYA must **“provide the child with assistance and support in developing a Transition Plan that is personalized at the direction of the child, includes specific options on housing, health insurance, education, local opportunities for mentors and continuing support services, and work force supports and employment services, and is as detailed as the child may elect”** (42 U.S.C. § 675(5)(H)). Ensuring that an up-to-date CPP, IL plan and Transition Plan are in the youth's case record will help the CCYA meet this requirement.

The Patient Protection and Affordable Care Act requires states to provide **“education about the importance of designating another individual to make health care**

treatment decisions on behalf of the adolescent if the adolescent becomes unable to participate in such decisions and the adolescent does not have, or does not want, a relative who would otherwise be authorized under State law to make such decisions, whether a health care power of attorney, health care proxy, or other similar document is recognized under State law, and how to execute such a document if the adolescent wants to do so” (477(b)(3).

Furthermore, OCYF requires that transition planning for youth who will discharge from substitute care on or after age 18 should occur as early as age 16 and, at a minimum, at least six months prior to a youth’s anticipated discharge.

Transition planning with youth should include the following elements or activities:

- A coordinated set of activities oriented toward producing results;
- Engagement, assistance and support to youth to create and nurture their full participation and ownership, from the planning process through the plan implementation;
- An ongoing, thoughtful and coordinated process which involves collaboration between the youth, service providers, family or non-family members, and other key resource providers;
- A youth-driven or directed planning process that serves the youth’s best interest and promotes safety, permanence, and well-being; and
- Results in a Transition Plan that is personalized at the direction of the youth through staff/agency support and assistance and includes specific options on housing, health insurance, education, local opportunities for mentors and continuing support services, and work force supports and employment services.

The Transition Plan required for discharge should be an extension of the CPP which includes the IL plan and should address, at a minimum: the anticipated living arrangements for the next six months; a source of income and development of a budget to address the youth’s living expenses during at least the initial six-month period after discharge; educational/training needs; continuance of health care services; and a plan for a personal support system, including connections with caring adults who will continue to be a part of the youth’s life.

The Transition Plan must address the objectives of achieving self-sufficiency and independence. Referrals to a shelter and the county assistance office would not satisfy transition planning standards. A youth should not be discharged from care without an established and court-approved plan for safe and affordable housing.

To assist counties in meeting the federal requirements, OCYF formed a small workgroup consisting of state, county, provider, youth and others to explore alternatives and design a planning process and transition plan for youth. The following Transition Assessment and 90 Day Transition Plan are suggested for use by CCYA.

Transition Assessment

It is recommended that a Transition Assessment be completed for each youth expected to discharge from substitute care on or after age 18. (see Appendix T. Sample Transition Assessment) The Transition Assessment is a suggested best practice process, which will ultimately inform the required transition plan. It is recommended that

the assessment begin for youth attaining age 16 or referred for IL Services. The Transition Assessment may be completed on paper or online as a saved document.

90 Day Transition Plan

The 90 Day Transition Plan (see Appendix U, Sample 90 Day Transition Assessment) provides CCYA and youth one option of using a comprehensive tool to meet the Fostering Connections transition planning requirement. The development of the plan by youth, with staff and other supports, creates opportunities to identify the strengths and needs of the youth prior to discharge and to develop action plans to address those needs. Some goals of the 90 Day Transition Plan are to promote a successful transition from substitute care to adult living; identify housing options; finances; permanent and supportive connections to others; education process and goals; employment and other resources.

Trial Discharge

OCYF recommends that CCYA consider trial discharge for youth who request to be discharged at, or after, age 18, and while engaged in a course of instruction or treatment. Requesting the court to retain juvenile court jurisdiction for at least 60 days, not to exceed six months, after the youth turns 18, preserves a time-limited opportunity for the youth to reenter care, if necessary, with the court's authorization. Pending any change in statute, each CCYA should work with its county court judges to develop a 'trial discharge' policy that will best meet the needs of county youth transitioning from foster care.

During this trial discharge, with the court's agreement, the CCYA will discharge its care and responsibility of the youth, but will continue monthly contacts to monitor the youth's situation. As long as the court retains jurisdiction, the court will have an opportunity to evaluate the youth's progress through the review hearing process. During these hearings, as long as the youth continues to be eligible, he or she will have the opportunity to request the court to continue dependency, request to be discharged or request to reenter placement services. Unless the court, the CCYA and the eligible youth are in mutual agreement that the youth's situation is stable and projected to remain stable, the youth should not be discharged, and the dependency petition should remain open. As long as the youth remains engaged in schooling or in a course of treatment, the petition may remain open, with mutual agreement, until the youth is 21.

For more information, see:

Appendix T: Sample Transition Assessment

Appendix U: Sample 90 Day Transition Assessment

Appendix J: Sample Trial Discharge Review and Court Order

Services to be Provided

Youth shall receive individualized services based on their unique strengths and needs identified through the assessment process. The strengths and needs of the youth shall determine the types of services to be provided, and that determination should not be limited to only those that are available. Those services needed by a youth, but not readily available, should be provided or arranged within a reasonable time period during the youth's anticipated period of placement. The delivery of services should occur at a

convenient time of day and location for the youth, at an appropriate phase of the youth's treatment needs and time in agency care.

CCYA shall insure provision of both direct and indirect IL services to support a youth's successful transition from substitute care to independence. Examples of the types of direct and indirect services and activities are listed below. These services are not exhaustive and are meant to serve as guides.

Additionally, CCYA are encouraged to develop new and innovative services and approaches to achieve the overall goals of IL services and to meet the individual needs of youth in substitute care. CCYA should encourage and support the promotion of positive youth development strategies.

A. Needs Assessment/Case Planning

It is recommended that CCYA use the Ansell Casey Life Skills Assessment, but may supplement it with other assessment tools. Use of this assessment tool is free of cost and staff training is available from the PA Child Welfare Training Program (CWTP).

To complete the intake process for IL services, CCYA must provide for a formal assessment to determine the needs of each youth. The needs assessment process must identify the individual youth's strengths and needs in the following key result areas:

- Life skills - It is important to assess the general skills of youth relative to every day living experiences. The ability of the youth to function in daily living is affected by the youth's knowledge of hard skills such as paying bills and cooking nutritional meals, as well as by soft skills such as coping with feelings and resolving conflicts with others.
- Prevention - The focus should include, at a minimum, the youth's involvement in, and need for services in at least the areas of drug and alcohol use, tobacco use and consequences of sexual behavior including teenage pregnancy and sexually transmitted diseases (STDs). Assessing prevention needs may be accomplished through testing and individual counseling.
- Education and training - The current educational situation of a youth, and the youth's future educational and training needs and possibilities, must be examined. The focus of this area is to explore the various education, training and career options and interests of the youth, and to explore the ability levels of the youth. Assessing education and training may be accomplished through testing and individual counseling.
- Employment - The youth's employment experience must also be assessed to determine his or her readiness for employment, including competitive employment, and any existing skills in locating, obtaining and maintaining employment. Employment may be assessed with the help of testing, a review of the youth's employment experience and individual counseling.
- Support – It is important to assess each youth individually to determine the level of support necessary to assist in achieving his or her individual goals and outcomes. This assessment should include the identification of adults who will continue to play a role in the youth's life after placement, and the development of a support system that includes other community services. All youth with the permanency goal of APPLA should receive a SWAN child profile as part of the assessment process to provide a continuum of services to promote reunification, adoption, permanent legal custodianship, and

informal (non-legal) permanent connections. This process should also include development of, or referral to, a mentoring program.

- Housing - It is important to assess a youth's short term and long term housing needs. This assessment should include the youth's knowledge of public housing options, rental responsibilities and related expenses. It is imperative that this assessment determine whether the youth has appropriate housing established prior to exiting substitute care.

Direct Services

Direct services are activities conducted on behalf of a youth to achieve the objectives established in the written description of IL services listed in the youth's CPP.

B. Life Skills Training

This IL service area includes programs and services designed to teach the necessary skills to assist youth to effectively function on a day-to-day basis as a self-sustaining member of society. Youth should be provided life skills training only in those areas where the need has been documented. Hard skills are tangible skills necessary for every day living. IL programs and services may include individual and group instruction of hard skills in the following areas:

- Locating, obtaining and maintaining a residence and negotiating a lease;
- Home management skills (i.e. food preparation and nutrition, laundry, cleaning);
- Identifying and utilizing community resources (i.e. police, clergy, banking, CareerLink, vocational rehabilitation);
- Identifying and utilizing community socialization activities (i.e. churches, parks, recreational activities);
- Time management;
- Human sexuality;
- Money management;
- Locating appropriate transportation;
- Obtaining driver's education (including license and insurance, when appropriate);
- Parenting;
- Consumer/shopping skills; and
- Understanding the importance of appropriate and necessary health care.

Youth often successfully complete IL services and exit care to independence only to experience serious challenges in their adult lives, if they have not received appropriate instruction and supportive opportunities to practice soft skills or abilities to cope when addressing crises. These skills are essential if a youth is going to maintain a job and stable healthy relationships. Soft skills are defined as those intangible skills needed to deal with personal issues and may include the following areas:

- Decision making;
- Self-esteem;
- Conflict resolution/problem solving;
- Impulse control/anger management;
- Peer interactions;
- Healthy dating and relationships;
- Communication skills;
- Stress management/coping strategies; and
- Cultural competence.

For more information, see Appendix K: Life Skills Program Options

C. Prevention Services

Prevention activities and skills development should be provided to youth receiving IL services in order to reduce the instances of drug, alcohol and tobacco abuse; domestic violence; teenage pregnancy; and STDs. Prevention services should include, but are not limited to, education on physical, dental and mental health issues; how to maintain good health through treatment and medication; and how to access services specific to health- and safety-related issues.

For more information, see Appendix L: Prevention Resources

D. Education Services

All youth in the Commonwealth have the right to a free appropriate public education up to 21 years of age or receipt of a high school diploma, even if the youth has withdrawn from high school in the past. Youth also have a right not to be in ongoing alternate learning program (ALP) placement; (only those with a current suspension for bringing weapons to school can be mandated to attend such programs). In addition to traditional educational programs, non-traditional options which lead to a high school diploma such as homebound instruction, evening classes or cyber-schools, may also be available. Services related to education and training should include the following:

- High school support and retention;
- Tutoring or other supplemental education;
- Support and advocacy for vocational training and post-secondary education;
- Special education;
- Preparation for/assistance in obtaining a GED;
- Assistance in exploring and preparing for entrance into higher education;
- Completion of the Chafee ETG program application;
- Intensive assistance and support to obtain all available financial aid for vocational training and post-secondary education; and
- Monitoring or mentoring services to improve retention in postsecondary programs, including insuring review of an ALP placement and assisting with re-entry to mainstream education.

Completion of high school is an important milestone in the transition to independence. Withdrawing ('dropping out') from high school at age 17, the age at which school attendance can no longer be compelled, should be discouraged by all child welfare and IL professionals working with youth. The CPP and/or case record documentation should identify the efforts made by staff to assist, support and/or encourage the youth to remain in high school. The reasons for the youth discontinuing his or her high school education must be documented in the case record.

For more information, see Appendix M: Educational Rights and Resources

E. Support Services

Supportive services made available to youth include, but are not limited to, the following:

- Individual and/or group counseling:
 - Career planning (aptitude, interest, etc.);
 - Life planning/decisions;
 - Employment (relationships with co-workers, supervisors, stress, etc.);
 - Educational issues (relating to peers/teachers, discipline issues, tardiness); and/or
 - Emotional/therapeutic concerns.

- SWAN Units of Service:
 - Child profile;
 - Child preparation;
 - Child specific recruitment; or
 - Post-permanency services.

- Youth may receive stipends:
 - As an incentive for program participation and/or completion;
 - Based on need for specific purposes such as security or utility deposits, tools, uniforms for work or school and clothing for job interviews; or
 - As the CCYA determines necessary, to meet the individual needs of youth to include, but not limited to, a class ring, prom or formal attire or yearbook.

When stipends for youth are a part of an agency's IL services, the CCYA must have written policy and procedures addressing the administration of stipends including, but not limited to, the following:

- Conditions for earning or awarded based upon need;
- Amounts that may be earned or awarded based upon need;
- Payment procedures;
- Conditions that would result in a stipend being withheld; and
- Other specific eligibility criteria for stipends.

Stipends should not be used to cover the cost of necessities or items that should be covered by the cost of care or insurance if the youth is still in care.

The stipend policy must be explained to the youth. Each youth shall sign a statement that the policy has been presented to him or her verbally and in writing prior to receiving a stipend. Staff who explained the policy to the youth must also sign the statement. This policy and signed statement must be maintained in the youth's case record.

CCYA and private providers must maintain documentation in the youth's case record of any stipend provided. This documentation acknowledges that the youth has received a specific amount of funds from the IL program. This document must include the youth's signature, purpose of stipend, the amount of the stipend and date of payment. A copy of the purchase receipt must be kept with the signed

acknowledgement statement for those payments made for a specific purpose (i.e. deposits, uniforms, etc.).

For more information, see Appendix O: Sample Stipend Youth Notification

- **Services for Teen Parents**

As part of the life skills training, the IL service should include the appropriate connections within the community for the youth to access infant services and supports. These services may include the Women, Infants and Children (WIC) supplemental food program for baby formula; agencies that provide car seats and baby furniture; parenting classes, etc. Activities that promote and assist teen parents with children in making the transition successfully from foster care to adulthood should be utilized.

- **Mentoring**

Studies have shown that youth who are mentored maintain positive permanent connections that continue beyond age 21, and they were less likely to engage in drug or alcohol use, resort to violence or drop out of school. Youth who are mentored are reportedly more likely to improve their grades and their relationships with others. Peer mentoring has been beneficial when former foster youth mentor current foster youth.

For more information, see Appendix N: Mentoring/Support Services

F. Employment Services

A youth's employment successes are more likely to occur in placement settings that encourage and support the youth in all aspects of finding and maintaining employment, including providing transportation.

Employment programs and services may include the following:

- Subsidized employment;
- Practice interviews;
- Job application/search assistance;
- Job shadowing;
- OVR services;
- Job coaching;
- Referral to job placement services; and
- Job follow-up activities.

For more information, see Appendix P: Employment Resources

G. Housing Services

These IL services are intended to educate and assist youth in understanding practical housing issues, and to aid in locating and securing safe and adequate housing prior to discharge. There are several ways that youth may be assisted in locating permanent housing that include, but are not limited to, any combination of the following:

- Referral to public housing agency or other subsidized housing programs;
- Interview preparation;
- Application assistance;
- Accompaniment of youth on inspection; and

- Use of local realtors as a housing resource.

H. Room and Board

PA defines CFCIP funded IL Room and Board services as financial aid and casework support to include payment or reimbursements for shelter, food, rent, security deposits, utilities, furniture, household items and other start up expenses that may be incurred for youth who have exited substitute care on or after age 18 through age 21. IL Room and Board services are fundable through the IL Services Grant CFCIP funds, and the OCYF Special Grant Housing Initiative with State and local funds only. CCYA may use allocated and available Housing Initiative funds for CFCIP eligible youth after CFCIP funds have been exhausted. The following table illustrates the appropriate funding sources by youth status and eligibility.

YOUTH STATUS and ELIGIBILITY	CFCIP	OCYF Housing Initiative
Exited agency care on or after age 18, but less than 21	✓	optional
Exited agency care after age 16, but before age 18	NA	✓
Exited agency care prior to age 16	NA	✓

CCYA should request and budget sufficient federal, State and local funds to make available room and board funding and programming which can help to prevent homelessness of youth who exited, or may not remain in agency care. In addition, CCYA are encouraged to coordinate with other local providers to apply for federal grants, such as: Runaway and Homeless Youth Act (Transitional Living Programs) and other Housing and Urban development grants, to assist in acquiring other funds for delivering room and board services.

At no time should the availability of CFCIP room and board services preclude the youth from remaining in substitute care should the youth need or desire the level of support that substitute care can provide.

CFCIP Room and Board

CCYA providing CFCIP funded room and board services are required to enter into a mutually agreed upon contract designed specifically for each individual youth. While CFCIP does not allow any state to expend more than 30 percent of its annual CFCIP IL allocation for room and board costs and services, CCYA may designate more than 30 percent with OCYF approval. OCYF will manage this CFCIP percentage. At no time will CFCIP funded room and board services be provided for any youth who did not discharge from substitute care on or after age 18.

Youth receiving CFCIP room and board services are able to access and receive the full range of IL services and supports. These include: employment, housing, support services, education and training, preventive services and life skills. Program staff must also support the youth through scheduled and unscheduled on-site contacts with the youth, telephone or other communications and providing 24-hour emergency contact information. These supportive and monitoring contacts with

youth should be structured to be more frequent in initial weeks or months, with appropriately decreasing frequency as the time approaches for the youth to be discharged from the program.

As with the provision of other IL services, CFCIP room and board services are voluntary, and youth may elect to discontinue agency services and subsidies at any time. Up to age 21, the youth retains eligibility to request consideration to receive the same services offered previously. CCYA may consider a youth's previous history with contract adherence when making a determination to re-offer services. Especially in cases of previous non-compliance issues, it behooves CCYA to assess information about the youth's recent and current behavior in terms of any indicators of positive interim progress the youth has made. A decision to re-offer services should be based on a contract that is structured to recognize both the youth's history and the youth's current status.

Prior to accepting a youth for CFCIP non-emergency room and board services, a multi-faceted assessment should be completed to determine income or earning potential so the youth may gradually assume ongoing costs in order to remain in the apartment. Financial, support, supervision and service needs of the youth must also be determined.

Room and Board Service Approaches

CCYA are recommended to develop and have available both emergency and planned room and board services to prevent homelessness of youth.

- A. Emergency room and board services – CCYA are advised to develop an emergency room and board plan to provide funds for emergency short-term situations of less than 10 nights to prevent potentially serious conditions that may jeopardize the youth's physical health in the event an unplanned housing issue is presented. This service is distinctly different than locating permanent housing and does not replace that necessary service to IL youth. Youth must meet the CFCIP Room and Board eligibility requirements for this service. Youth are not required to meet the required elements listed below for emergency room and board services. These attempts must be documented in the case record.
- B. Planned room and board services – This approach includes both temporary and extended services to assist youth, who meet all of the room and board eligibility requirements, with room and board costs. These services should include detailed planning and assessment while the youth is in substitute care or after exiting substitute care. If deemed appropriate and consistent with the youth's needs and his or her CPP, the youth would secure housing in an apartment or other appropriate setting for a pre-determined period of time. CFCIP grant funds for planned room and board services may be used as follows:
 - Temporary and/or partial assistance when a youth is between educational semesters and other living arrangements are not possible; or
 - Extended assistance and enrollment in a program designed to be consistent with the youth's permanency plan goal and his or her needs and abilities. This may be an SIL arrangement or stipend paid to the youth in a step-down approach in

which the child and agency mutually agree on a process to decrease the funds directed at room and board costs over a period of time. For example, over a six-month period the CCYA may provide 100% rent assistance for two months, 60% for the next two months, and 30% for the remaining two months. In no case should a CCYA use an open-ended funding arrangement.

Required Elements for CFCIP Room and Board Assistance

Youth must meet the required elements for room and board services as follows:

- Be at least 18 years of age and have exited substitute care, even if a dependency petition remains open;
- Be able to live in the community without continuous adult supervision;
- Have the skills to manage day-to-day living activities in an apartment or other IL arrangement;
- Be able to cooperate with the supervising agency to further develop his or her IL skills;
- Be willing to participate in continued needs assessments;
- Be willing to enter into a room and board contract with the agency;
- Be willing to identify other community agencies with which he or she has involvement; and
- Not have current substance abuse issues or a recent history of substance use without having undergone rehabilitation.

Room and Board Supervision

CCYA may provide the supervision of room and board services to youth directly or through a purchase of service agreement with a private children and youth agency. Child welfare professionals providing supervision for youth initially receiving a room and board stipend must conduct on-site visits with each youth at least once a week for the first month. Thereafter, CCYA may consider less frequent site visits to provide a more realistic situation as the youth's living arrangement and situation becomes more stable. More intensive supervision may be required early in the program, during preparation for discharge or discontinuance of funding and when the youth is experiencing problems. During these supervisory visits the child welfare professional should evaluate the progress and difficulties the youth is encountering, advocate for, or support the youth, or intervene to resolve these difficulties. Youth receiving room and board services must have 24-hour phone access to the agency providing supervision services.

The child welfare professional should monitor the room and board setting to ensure it is:

- Free of objects, materials and conditions that constitute danger;
- Inclusive of an operable smoke detector;
- Inclusive of a fire extinguisher in working condition; and
- Possessed of adequate arrangements for the storage and preparation of food.

Room and Board Contracts

The CCYA or private children and youth agency must provide written notification of the room and board policy to the youth prior to his or her receipt of such services. The youth and the agency caseworker must sign a statement that the notification was provided to the youth which must then be maintained as documentation in the case

record. This notification should also be witnessed by a third party. All CCYA agencies and private providers of service, where appropriate, must maintain a record of room and board payments processed by the agency within the case record or a receipt in the form of the youth's signature stating the specified amount of the room and board payment received. This acknowledgment must be on agency letterhead and be witnessed with the signature of the caseworker, the IL coordinator or other appropriate agency official.

The child welfare professional from the CCYA or private children and youth agency, and the youth, must mutually develop and sign a contract for room and board services. The contract must be on agency letterhead and include signatures of the youth and child welfare professional. The contract must have clear rules, responsibilities and expectations. Listed below are the minimum requirements for room and board contracts:

- Clear identification of responsibilities of both the agency and the youth;
- Financial amounts contributed, by whom and according to what schedule;
- Rules of conduct;
- Employment objectives;
- Education/training objectives;
- Extent of child welfare professional's involvement and visits;
- Consequences for non-compliance with the contract; and
- Termination date of room and board services.

The contractual agreement may be subject to change only if negotiated and signed by all parties.

For more information, see Appendix Q: Sample Room and Board Youth Notification

I. Retreats and Camps

Retreats and camps are activities designed to improve self-esteem and self-confidence; e.g. local or Statewide retreats, youth conferences, youth engagement activities, leadership forums and workshops. These activities should promote the development of IL skills and the provision of IL services.

J. Indirect Services

Indirect Services are activities conducted to support an IL program that may include, but are not limited to, the following:

- Training of staff, foster parents, adoptive parents and other residential child care providers to understand the IL grant program and their roles as directed by the agency;
- Community outreach and education efforts designed to stimulate support for housing, employment, education and other opportunities for youth leaving care;
- Interagency coordination to support IL activities and services at the local level such as an interagency steering committee and any interagency cooperative agreements; and
- System change efforts.

Aftercare

FCIA requires states and their CCYA to make aftercare services available to youth formerly in foster care. **The availability of aftercare services is mandatory.**

Aftercare services are defined as IL services available to any youth who exited substitute care on or after his or her 16th birthday and prior to his or her 21st birthday. Aftercare services may include the full range of services available to IL participants, including any service areas addressed in the assessment, counseling and/or stipends; however, if the youth entered an adoptive or PLC situation before turning age 16, he or she would not be eligible for any stipends. The aftercare services provided to an individual youth must be described in the youth's IL/PPP.

CCYA and private providers of service must maintain, within the youth's case record, documentation that Aftercare Services have been offered to all eligible youth. The aftercare policy must include a statement signed by the youth indicating they are aware of the availability of aftercare services, in which they may participate after discharge and until they reach their 21st birthday. All youth eligible to receive IL services should be presented with Aftercare Services information and availability at the onset of services. Youth must also be informed of this service prior to their discharge from agency care. In cases in which youth, age 16 or older, are being adopted or entering into PLC, it is recommended that the caregiver also sign a statement acknowledging that IL services are available to the youth up until age 21.

For more information, see Appendix R: Sample Aftercare Services Youth Notification

For more information, see Appendix S: IL Web Resources on the Internet