



OFFICE OF CHILDREN, YOUTH AND FAMILIES BULLETIN

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

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SUBJECT: Youth Independent Living Services Guidelines	BY: <i>Cathy A. Utz</i> Cathy A. Utz Acting Deputy Secretary for Children, Youth and Families		

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**

Origin: David Derbes (717-705-2911)

Finally, the fourth, the Patient Protection and Affordable Care Act of 2010 (PPACA), provides for information and education about the importance of having health 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: 2011 Youth Independent Living Services Guidelines Bulletin: Frequently Asked Questions and Recommendations for Implementation (Appendix.)

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 may also 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 the funding streams available to pay for IL services and specific situations in which to use a specific funding source. CFCIP funds are limited to fund only those youth who meet specific eligibility criteria. 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	✓	✓
• Dually adjudicated dependent and delinquent; or	✓	✓
• Delinquent with shared case responsibility between the CCYA and the Juvenile Probation Office (JPO); or	✓	✓
• Adjudicated delinquent only;		✓
<i>and, after meeting any of the above criteria the following eligibility and funding source applies if the youth:</i>		
• Is a pre-adoptive or 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 who do not meet any of the above criteria, but for whom the county identifies as in need of IL services.		✓

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 any state or county child welfare system remain eligible for IL services up to age 21 through the county/state in which the youth now resides. See Aftercare on page 24.

2. Identifying Youth Most Likely to Remain in Care

The CCYA must determine which youth are most likely to remain in care. The CCYA should consider the agency’s history and success with achieving the permanency goals for youth and any programs or practices in place to facilitate timely reunification. This

decision to identify the youth most likely to remain in care should be individualized to meet the specific needs of each youth and the considerations above should be used to prioritize youth in need and should not exclude any youth. This ensures that youth with the greatest needs are prioritized without excluding youth with fewer needs. Once the determination is made that a youth is most likely to remain in care until age 18, the youth should be given priority to receive IL services.

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 to be deliberate, enduring, lasting, and 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, but not limited to, the following:

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

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

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. All youth should be placed in the least restrictive, age appropriate, most family-like setting taking into account the youth's individual or identified needs, community, educational, personal and familial connections.

Regardless of the placement setting, youth's preparation for independence should occur in the placement setting as well as through formal and informal IL instruction based on the assessed needs of the youth. 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 are very effective in developing appropriate levels of responsibility and IL skills. Youth learn best through experiential and supportive learning. CCYA should have a continuum of placement types available to meet the needs of all youth. CCYA are encouraged to create or utilize appropriate programming and placement settings to prepare youth for the realities of adult living and to 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 TLPs 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 may be obtained by contacting the OCYF regional office.

Supervised IL (SIL)

SIL is a less restrictive placement setting for dependent or 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. The costs for SIL to be paid by the CCYA, or provider agency, should include, at minimum: rent, food, utilities, cooking equipment, eating utensils and furnishings. (Television, telephone and internet access must be provided, but may be limited to basic levels of service with the youth assuming costs for additional services.) A portion of the SIL arrangement may be paid to the youth directly as a stipend.² SIL placement settings may include the following living arrangements:

- Apartments at various locations in a community;
- Specialized apartments designed for youth to acquire skills prior to transferring to another apartment; and
- College dormitory or residence.

SIL placement settings should also do the following:

- House no more than three youth in the unit (and may include a youth's child); and
- Provide youth with access to an agency staff person at any time, but does not provide 24-hour supervision.

² For example, if the youth's SIL setting is a college dormitory, the CCYA may provide the youth directly with a stipend for daily living expenses.

The Title 55 Pa Code, Chapter 3680 (relating to the Administration and Operation of a Children and Youth Social Service Agency) govern SIL placements and require an approved program description which clearly describes how the agency will implement and monitor the SIL program. The agency is licensed, however, the physical SIL sites are not licensed. The agency is responsible for verifying that the site is in compliance with all state and local laws, ordinances, rules and regulations concerning health and safety. In most cases, the agency providing SIL enters into a lease with a landlord and the youth is placed in the apartment.

Though funding should not be a consideration when determining whether placement in a SIL is in the best interests of the youth. It is important to note that Fostering Connections amends the existing definition of child care institution to include SIL placements effective October 1, 2010. As of this date, SIL placements will be eligible for federal placement maintenance when the youth residing in the SIL meets all of the following requirements:

- Is determined to be Title IV-E eligible;
- Is 18 years old³; and
- Is 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.

If the youth residing in the SIL does not meet the requirements for Title IV-E reimbursement, CCYA may use Act 148 funding.

Room and Board (see Section H, page 19)

Room and board services may 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 may 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 reimbursement 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. CCYA, their providers, and youth/alumni, should partner 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

³ While a youth under the age of 18 may reside in an SIL, federal regulations require that the youth be 18 in order to receive Title IV-E reimbursement in such a placement. If the youth residing in the SIL is under the age of 18, they may be Title IV-E eligible, but not Title IV-E reimbursable.

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. In addition to those services listed above, youth with a goal of adoption are eligible to receive placement and finalization units of service. Youth who exited care to legal permanency through adoption, placement with a fit and willing relative, or permanent legal custodianship are also eligible for post-permanency services. SWAN services are intended to 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 and permanency.

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

7. Coordination and Collaboration

The success of IL services is dependent upon the level of 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, physical and behavioral health, substance abuse and other prevention services, job readiness and the ability to access employment and housing are all critical components to the successful transition of youth from placement to independence. It is equally critical to develop cooperative and collaborative relationships between the CCYA and other service providing systems to ensure effective coordination and delivery of these services.

Youth and alumni of the child welfare system are key stakeholders in designing effective and engaging IL services. When designing IL services, these youth and alumni should be engaged to lead the process. Regional and local teams of youth and alumni are encouraged to monitor and evaluate the effectiveness of IL services through means such as surveys and facilitated focus groups.

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. CCYA may not exclude youth from the provision of IL services because it is assumed they cannot benefit from such services if they are not likely to obtain full independence. Federal and Commonwealth statutes require that CCYA ensure 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, including county mental health and mental retardations services, 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 24.)

IL Services Coordinator

CCYA must designate an IL Services Coordinator who is responsible to coordinate the requirements of this bulletin. The IL coordinator may also be responsible to comply with the requirements of 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:

- Contact person for OCYF and it's training, support and technical assistance providers;
- Primary contact for the agency to provide internal and external training, support and assistance;
- Contact person with OCYF to assist with youth eligibility determinations for the ETG program, as necessary;
- Contact person with OCYF and it's contracted NYTD provider to meet the requirements for the NYTD data collection and submissions; and
- Contact person 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 the youth attaining age 16. A referral for a SWAN child profile unit of service is also recommended to provide a continuum of services to promote the youth's permanency goal. A delayed referral should not inhibit the assessment of the youth's needs. .

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. The IL plan must be updated at least every six months in conjunction with the permanency hearing and other court reviews.

In addition to those items required to be maintained in all child records, the following items must also be maintained in the county case record 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;
- A copy of the youth's Social Security Card;
- Voter Registration Documentation;
- Health Care Power of Attorney or Health Care Proxy for youth whom there is documentation that a youth is not competent to make their own health care decisions (this may include youth with intellectual disabilities or significant cognitive impairments);
- 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.

Counties that contract with private provider agencies to deliver IL services should share copies of the pertinent case record documents.

The following items, if applicable, are also recommended to be included in the county 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 and Appendix S: Health Care Power of Attorney or Health Care Proxy and Sample

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” (P.L. 110-351, Section 475 (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 PPACA 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” (P.L. 111-148, Section 422 (b)(15)(a)).

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, 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 following: 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 sustainable housing. Juvenile Court Procedural Rule 613 outlines the process utilized by courts to terminate court supervision of dependent children 18 years of age or older, including 90 days transition plan and corresponding court review.

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 U. Sample Transition Assessment) The Transition Assessment is suggested best practice to inform the required 90 day transition plan. It is recommended that the assessment begin for youth at age 16 or referred for IL Services, whichever is earlier. The Transition Assessment tool may be completed on paper or online as a saved document.

90 Day Transition Plan

The 90 Day Transition Plan (see Appendix V, Sample 90 Day Transition Assessment) provides CCYA and youth with one example of 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

The purpose of establishing a trial discharge agreement is to create a safety net for youth who request to be discharged at, or after, age 18 while engaged in a course of instruction or treatment. Trial discharge is a best practice intended to provide youth with a short-term opportunity to return to a placement setting, insuring their health, safety and well-being. It is not intended to be a long-term alternative. OCYF recommends that CCYA consider trial discharge agreements as a best practice for all youth meeting the eligibility criteria. Because this best practice includes specific judicial action, CCYA are also advised to meet with its county court judges to recommend and develop a 'trial discharge' policy that will best meet the needs of youth transitioning from foster care.

The following components are needed for all trial discharge processes and policies:

- The CCYA and youth will establish a mutual agreement for recommendation to the court which clearly identifies the responsibilities of the CCYA, youth and any other individual or entity involved with the child's case. The agreement also must clearly inform the youth, in a language they can understand, of their responsibilities to maintain the terms of the trial discharge and include the youth's signature. These responsibilities must include, at a minimum, the following:
 - The requirement to participate and remain involved in the course of instruction or treatment;

- To make oneself available to meet with the agency caseworker; and
- To notify the CCYA of any changes in the trial discharge agreement, the transition plan, current address, or planned instruction or treatment.
- The trial discharge agreement must be documented in the youth's transition plan.
- The court, upon approval, must retain juvenile court jurisdiction for at least 60 days but not to exceed six months.
- The court jurisdiction must remain open with the youth retaining dependency status.
- The CCYA maintains responsibility for placement and care and will continue monthly contacts with the youth in accordance with current regulatory requirements and applicable bulletins to monitor the youth's situation.
- The court must evaluate the youth's progress through the permanency review hearing process at a minimum of every six months and consider the stability of the youth's current and future situation.
- Youth who continue to meet the eligibility criteria will have the opportunity to request the court to continue dependency, be discharged or reenter placement services.
- As long as the youth remains engaged in a course of education or treatment, the disposition may remain open, with mutual agreement, for a period not to exceed one year from the date of the original trial discharge agreement.
- If, at any time, and for any reason, during the trial discharge period, the course of instruction or treatment is not maintained, the trial discharge ends and the CCYA must recommend to the court to close the court jurisdiction and close the record.

Note: The trial discharge cannot exceed two six month periods or one year from the date of the initial trial discharge period.

Medical Assistance eligibility continues for youth entering a trial discharge agreement. The CCYA must complete the CY 60 form indicating the youth's new address. A note must be attached to the CY 60 to indicate that the youth is on trial discharge. Medical Assistance eligibility will remain open until the final decision has been made by court order to close the dependency case. The CCYA should keep the CY 61 open to maintain the youth's Title IV-E and Medical Assistance eligibility.

The youth will also retain Title IV-E eligibility should they return to a foster care placement from a trial discharge as long as there is no break in the foster care episode. The following criteria must be met for the youth to be considered as continuously in foster care, thus maintaining their eligibility for Title IV-E reimbursement:

- The court determines that the child remain on trial discharge every six months at the review hearing;
- The court determines that the CCYA retains responsibility for placement and care for the youth every six months at the review hearing; and
- The youth is 18 years of age, but under the age of 19, and is a full time student expected to complete their secondary schooling or equivalent training before reaching age 19.

If a youth returns from a trial discharge and does not meet the criteria listed above, they are no longer eligible for Title IV-E reimbursement and the CCYA would be required to use state and local funds for the youth's placement costs.

For more information, see Appendix J: Sample Trial Discharge Review, Mutual Agreement, and Court Order, Appendix U: Sample Transition Assessment and Appendix V: Sample 90 Day Transition Assessment

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 services that are currently 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 and during an appropriate phase if the youth is involved in a treatment plan.

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 (sections A through J). These services are not exhaustive and are solely intended to serve as guidance.

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.

Direct Services

A. Needs Assessment/Case Planning

It is recommended that CCYA use the Ansell Casey Life Skills Assessment, however, other assessment tools may be used as supplements. This assessment tool is available at no 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 youth's 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 is to explore the various education, training and career options and interests of the youth, and to determine their ability levels. 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 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 permanency. This process should also include the 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 sustainable housing established prior to exiting substitute care.

B. Life Skills Training

This 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 (e.g.. food preparation and nutrition, home safety and basic maintenance, laundry, cleaning);
- Identifying and utilizing community resources (e.g. police, clergy, banking, CareerLink, vocational rehabilitation);
- Identifying and utilizing community socialization activities (e.g. churches, parks, recreational activities);
- Time management;
- Human sexuality;
- Money management;
- Locating appropriate transportation;
- Obtaining a driver's education (including license and insurance, when appropriate);
- Parenting;
- Personal care including grooming, personal and oral hygiene;
- Consumer and shopping skills; and

- Understanding the importance of appropriate and necessary health care, (e.g. regular physical and dental examinations.)

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

Caseworkers are now required to administer the Education Screen per OCYF Bulletin 3130-10-04 Educational Stability and Continuity of Children Receiving Services from the County Children and Youth Agency (CCYA) Including the Use of an Education Screen 3130-10-04 for all youth in out-of-home care at least every 6 months. For children living with their family in their own home and accepted for services by the CCYA, the Screen must be completed with the development of the Family Services Plan, as well as annually thereafter (or more frequently on an as needed basis.) The Screen provides helpful information to assist in addressing barriers to educational progress and success. Two Sections of the Screen are particularly relevant for older youth—Progress Toward Promotion or Graduation and Preparation for Postsecondary Education. Caseworkers involved in the provision of IL services and planning should consult the Screen so that it can be integrated into the youth's IL services and planning.

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 Alternative

Education for Disruptive Youth (AEDY) 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 AEDY 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;
 - Family profile;
 - Child preparation;
 - Child specific recruitment; or
 - In addition to these services listed above, youth with a goal of adoption are eligible to receive placement and finalization units of service. Youth who exited care to legal permanency through adoption, permanent legal

custodianship or placement with a fit and willing relative (formal kinship care) are also eligible for 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. If the agency engages in a recurring stipend payment to a third party or vendor on the youth's behalf, a statement may be signed at the beginning of the payment period outlining the cost and duration of the stipend. 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 by adults 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 also been beneficial when former foster youth mentor current foster youth.

For more information, see Appendix N: Mentoring/Support

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;
- Local Workforce Investment Board (LWIB); 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. IL Program staff must also support the youth through scheduled and unscheduled on-site contacts, 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 living 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. All payments for room and board, regardless of type, may be made directly to the youth or housing resource.

Potential housing resources may include the following:

- Former foster parents;
- Landlord or property manager;
- Kin and extended family;
- Mentors and permanent connections; and
- Other suitable adults.

Housing resources do not include birth or adoptive parents.

- 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 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 abilities, 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 a housing 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 that does not include the dollar amount and length of time of the agreement.

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;
- Meets all applicable city, local, and state ordinances;
- Adequately furnished based on the needs of the youth;
- Inclusive of an operable smoke detector;
- Inclusive of a fire extinguisher in working condition; and
- Equipped with basic appliances and 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 design 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, speaking engagements and workshops. These activities are intended to promote the development of IL skills and the provision of IL services. CCYA are encouraged to engage youth in these opportunities for personal growth and development.

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 for youth who were formerly in foster care regardless of the county or state where services were previously provided.** The county where the youth is currently residing is responsible for the assessment and delivery of services. The availability of aftercare services are essential in preventing and/or minimizing the setbacks that can occur after discharge from substitute care. 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 provided by the former foster family, group home or institution, the county agency or the contracted provider must be described in the youth's IL/PPP.

CCYA and private providers of service must maintain documentation in the youth's case record that Aftercare Services were 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 T: IL Resources on the Internet