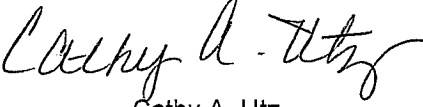


OFFICE OF CHILDREN, YOUTH AND FAMILIES BULLETIN

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

	NUMBER: 3130-14-01	ISSUE DATE: December 8, 2014	EFFECTIVE DATE: Immediately Credit History Reporting: Oct. 1, 2011 Act 91 of 2012: July 5, 2012
SUBJECT: Youth Independent Living Services Guidelines	BY:  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. Guidance on Credit History reporting and Act 91 of 2012 have been provided through various forms of print and verbal communications since August 9, 2012 and September 28, 2012, respectively. This bulletin rescinds and replaces Office of Children, Youth and Families Bulletins # 3130-11-04 entitled Youth Independent Living Services Guidelines of July 8, 2011 and Bulletin # 00-94-07 entitled Supervised Independent Living Guidelines of July, 1994 which transmits guidelines for the development and implementation of Supervised Independent Living programs for youth ages 16 and older licensed by the Department of Public Welfare under Title 55 Pa. Code, Chapter 3680 regulations (relating to Administration and Operation of a Children and Youth Social Service Agency.)

**COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO: OCYF
Regional Directors**

Origin: David Derbes (717-705-2911)

BACKGROUND:

Beginning in 1997, Congress passed, and the President signed into law, five 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.

The fourth, the Patient Protection and Affordable Care Act of 2010, also known as the ACA, provides for information and education about the importance of having a health care power of attorney or health care proxy and executing such a document. The ACA also provides Medical Assistance coverage up to age 26 for youth who at any time on or after their 18th birthday exited Pennsylvania's or another state's foster care system and were enrolled in Medical Assistance. Youth were eligible beginning January 1, 2014 for this coverage until age 26.

The Child and Family Services Improvement and Innovation Act (CFSIIA) of 2011 amended the case review system definition to require that each child age 16 and older in foster care receive a copy of their consumer credit report annually until discharged from foster care, and be assisted in interpreting the credit report and resolving any inaccuracies.

Building upon these federal requirements, on July 5, 2012, the Commonwealth enacted Act 91 of 2012 to revise the definition of "Child" in §6302 of Title 42 (the Juvenile Act) for youth who elect to remain in foster care to reflect the provisions of Fostering Connections, to include employment related activities and Title IV-E or Act 148 reimbursability up to age 21. The Act also provides for the 'resumption of jurisdiction', or ability for former dependent youth prior to reaching age 21, to request the court to resume dependency jurisdiction if the youth or non-minor dependent continues to meet the definition of child and dependency jurisdiction was terminated within 90 days prior to the youth's 18th birthday or on or after the youth's 18th birthday, but before the youth turned 21.

The passage of ASFA, FCIA, Fostering Connections, ACA and CFSIIA 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. Similarly, the Commonwealth's passage of Act 91 significantly broadens and clarifies the definition of child to improve successful transitions and provides youth the ability to request the court to resume dependency jurisdiction and consider actions including entry or to return to agency care as a non-minor dependent if circumstances warrant. 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 these important pieces of legislation.

DISCUSSION:

Included with this bulletin is a compendium of resources titled: 2014 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), 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, 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 subgroups of youth who are under age 21, including youth who are under age 16¹, youth who are returned home or placed with relatives. Services may also be extended to delinquent youth. State and local funds may be used to pay for IL services for youth excluded from CFCIP eligibility.

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:

¹ The CCYA may provide IL services with state and local funds to youth under 16 with an approved request to OCYF.

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:		
<ul style="list-style-type: none"> • Dependent; or 	✓	✓
<ul style="list-style-type: none"> • Dually adjudicated dependent and delinquent; or 	✓	✓
<ul style="list-style-type: none"> • Delinquent with shared case responsibility between the CCYA and the Juvenile Probation Office (JPO); or 	✓	✓
<ul style="list-style-type: none"> • Adjudicated delinquent only; 		✓
<i>and, after meeting any of the above criteria the following eligibility and funding source applies if the youth:</i>		
<ul style="list-style-type: none"> • Is a pre-adoptive or adoptive youth; or 	✓	✓
<ul style="list-style-type: none"> • Is a qualified alien child; or 	✓	✓
<ul style="list-style-type: none"> • Is an undocumented alien child or alien child legally admitted on a temporary basis for work, study or pleasure; or 		✓
<ul style="list-style-type: none"> • Is a youth with special needs. 	✓	✓
Youth who do not meet any of the above criteria, but who 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 35.

2. Identifying Youth Most Likely to Remain in Care Until age 18

CCYA must determine which youth are most likely to remain in care. 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. The decision to identify a youth most likely to remain in care should be individualized and a plan should be created to meet the specific needs of the youth. The considerations above and a youth’s individual risk and protective factors should be used to prioritize

youth in need but 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 must create or utilize programming and a continuum of placement settings that prepare youth for the realities of adult living and decrease the number of youth in congregate and institutional care. CCYA are encouraged to utilize the continuum of placement settings for each youth consistent with the youth's ability to assume more responsibility, or as necessary, temporarily return to a more restrictive level of care. Further, CCYA should continue to work with youth to form permanent connections with **supportive** adults. 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, as well as community, educational, personal and familial connections. Regardless of the placement setting, a youth's preparation for independence should occur in the placement setting as well as through formal and informal IL instruction and practice based on the assessed needs (formally or informally identified) of the youth. This preparation means not only should the caretaker/provider staff provide IL skills

instruction and opportunities for the youth to actively practice skills, such as cooking, laundry tasks and budgeting, but caretakers and provider staff should also set and maintain rules consistent with the youth's age and development.

The implementation of Fostering Connections and Act 91 clarify placement setting and federal financial reimbursement opportunities available for youth transitioning from foster care. The following continuum of placement settings fall under the federal definition of "foster care" which includes Supervised Independent Living (SIL) settings. CCYA having placement and care responsibility of a dependent minor or non-minor youth may claim Title IV-E or Act 148 placement maintenance funds for allowable placement costs.

The following table highlights the array of placement settings available from the most restrictive to the least restrictive setting:

Placement Type	Age	License Requirement
Emergency Shelter	Up to age 21	"licensed according to the setting in which the service is being provided" Chapter 3800 Chapter 3700 Chapter 3680
Community Residential/Group Home	Up to age 21	Chapter 3800
Transitional Living Residence (TLR)	16-21	Chapter 3800
Licensed Family Foster Home	Up to age 21	Chapter 3700
Licensed Supervised Independent Living Placement (L-SILP)	16-21	Chapter 3680
Unlicensed SILP (U-SILP) - Host Home - Apartment style - Higher Education On-Campus	18-21	Not Required

CCYA have multiple placement setting options available to best assist older foster youth and non-minor youth transition from agency care; of these, three in particular deserve closer attention. The following subsections provide instruction and guidance to aid counties in determining whether a Transitional Living Residence, Licensed Supervised Independent Living Placement (L-SILP) setting or Unlicensed Supervised Independent Living Setting (U-LISP) might be the most appropriate placement setting for a particular youth.

Transitional Living Residence (TLR) Placement (see Appendix C)

The intent of a TLR placement setting is to provide youth with the opportunity to learn and practice life skills while receiving consistent, but not constant, supervision and guidance. TLR are licensed by the Department of Public Welfare under Title 55 Pa. Code, Chapter 3800 regulations (relating to Child Residential and Day Treatment Facilities.) A TLR is a 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 youth's own children are counted towards the maximum number of four children allowed per TLR. TLR are often commonly known as transitional living programs or placements. Contact the Bureau of Licensing Operator Support Hotline at 1-866-503-3926 or email ra-pwarlheadquarters@pa.gov for more information.

Supervised IL Placement (SILP) for Non-minor Youth

Fostering Connections allows states to define SILP settings in which non-minor youth between the ages of 18 and 21 live independently and defers to states to prescribe the kinds of living arrangements considered a supervised setting, the parameters of supervision and any other conditions for youth age 18-21 living independently. Prior to Fostering Connections, Pennsylvania supported licensed SILP settings for youth ages 16-21. In an effort to provide clarification regarding SILP options available in Pennsylvania, the following subsection describes two types of SILP settings: Licensed (L-) and Unlicensed (U-). The primary differences between L-SILP and U-SILP are licensure and age requirements. CCYA are encouraged to expand and further develop placement resources for older youth that fall into the continuum described below. Federal Title IV-E reimbursement is available for SILP settings meeting the following criteria when the youth meets Title IV-E eligibility requirements.

Licensed Supervised Independent Living Placement (L-SILP Settings for Youth ages 16-21)

L-SILP is a less restrictive placement setting for non-minor youth age 16-21 who live in a single residence or unit. This setting was previously governed by Bulletin # 00-94-07 entitled Supervised Independent Living Guidelines of July, 1994. That bulletin is now rescinded and replaced with the guidelines and requirements outlined herein. The intent of a L-SILP setting is to provide youth, age 16-21 with the opportunity to put into practice the life skills they have learned in a service-supported living arrangement so that they can successfully transition to being self-sufficient adults upon their discharge from the child welfare system. The costs for a L-SILP 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 placement costs may be paid to the youth directly as a stipend.

In most cases, the CCYA or provider agency overseeing the L-SILP enters into a lease agreement with a landlord and the youth is placed into an apartment. L-SILP settings may include the following living arrangements:

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

L-SILP settings must also:

- 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.

The Title 55 Pa Code, Chapter 3680 regulations (relating to the Administration and Operation of a Children and Youth Social Service Agency) govern L-SILP settings and require an approved program description which clearly describes how the agency will implement and monitor the L-SILP program. The agency must be licensed under Chapter 3680 (CCYA are exempted from Chapter 3680 licensure) and is responsible for verifying that the physical site is in compliance with all federal, state and local laws, ordinances, rules and regulations concerning health and safety. While L-SILP settings will not be licensed as foster family homes, it is strongly recommended that the physical site meet the following Title 55 Pa Code, Chapter 3700 regulations (relating to Foster Family Care Agency).

- 3700.66 – Foster family residence requirements
- 3700.67 – Safety requirements
- 3700.69(a) – Annual reevaluation

Unlicensed Supervised Independent Living Placement (U-SILP) for Non-minor Youth Ages 18-21

U-SILP are the least restrictive and include a range of placement settings for non-minor youth **between the ages of 18 and 21** that provide age appropriate independence and responsibility (Federal and state statute do not permit youth ages 16 and 17 to live in U-SILP settings.) U-SILP settings can include, but are not limited to, host homes (see U-SILP Settings, Host Homes), college dormitories or on campus residences, and various forms of supervised or unsupervised apartments. The intent of an U-SILP is to provide non-minor youth with the opportunity to put into practice the life skills they need to master to be successful upon their discharge from CCYA placement and care.

Descriptions of U-SILP settings are provided in the next section. Unlike family foster care and residential programs, the U-SILP setting itself (the physical site) need not be individually licensed. Rather, CCYA may enter into contracts with private provider agencies or individuals or CCYA may directly provide U-SILP settings that meet the following requirements.

U-SILP Setting Types

CCYA and private provider agencies have the discretion to develop and use a range of U-SILP settings and safety protocols that can be reasonably interpreted as consistent with the law. U-SILP settings need not be in the legal control of the CCYA or a private provider agency.

Below is a description of the U-SILP settings that are clearly appropriate. If a desired setting that is appropriate for a non-minor youth is not included in the list below, the private provider agency or CCYA should contact the state IL Coordinator and DPW/OCYF Regional office in writing about the acceptability of the setting. Consistent with federal guidance, DPW/OCYF encourages creativity and innovation in the development and use of these settings and does not intend the list below to be exhaustive.

i. Host Homes:

A U-SILP host home setting is one where a youth rents a room in a family or single adult's home, shares basic facilities, and agrees to basic rules while being largely responsible for his or her own life. U-SILP host home settings provide the opportunity for a youth to develop skills prior to discharging from CCYA placement and care and living on their own. The family/adult hosting the non-minor youth should be a reliable and supportive resource who can provide guidance as the youth transitions to adulthood. The family/adult hosting the non-minor youth does not have to be a licensed resource parent nor do they have to go through the process of having the home licensed. U-SILP host home living arrangements should not be confused with Community Residential Rehabilitation Services (CRRS) host homes for children. CRRS host homes are private family residences with whom the CRRS has a contract to provide a structured living arrangement for one to three children with a chronic psychiatric disability. CRRS host homes must be licensed by the Department of Public Welfare under Title 55 Pa. Code, Chapter 5310 regulations (relating to Community Residential Rehabilitation Services for the Mentally III).

Clear examples of an U-SILP host home setting include a former resource family/parent, teacher, coach, relative, kin, or church member with whom the non-minor youth has a positive relationship. In this environment, the non-minor youth is able to come and go as they choose, expected to follow the rules of the home as with any other renting situation and expected to manage their time, money, school, work, and appointments without oversight from the host home family/adult. CCYA and private provider agencies should facilitate the creation of a host home agreement between the non-minor youth and the host family/adult that is included with the child's permanency plan, IL plan and/or transition plan. There may be occasions when an agency believes it is clearly in the best interests of a non-minor youth to consider the home of a biological parent(s) as an appropriate U-SILP host home setting. In these cases, the agency must document the rationale and efforts to secure other arrangements in the youth's case record. Additionally, federal guidance prohibits foster care maintenance payments to biological parent(s).

See Appendix T: Independent Living Resources for a sample host home agreement

Based on the non-minor youth's capacities and needs as documented in the case plan, CCYA can pay the host family/adult directly for rent and other living costs, pay the non-minor youth directly and hold them responsible for paying all bills, or some combination of both indirect and direct payment. Additional information on payment is included under the "Foster Care Maintenance Payments and Other Costs for U-SILP Settings" section of this bulletin.

ii. Apartment Settings

Apartment settings allow for a lesser restrictive placement setting for non-minor youth who have demonstrated the ability or possess the capacity to function with minimal supports and supervision. The non-minor youth, age 18-21, lives in an apartment that meets the needs of the non-minor youth. Roommates, including the non-minor youth's child(ren), are permissible. The CCYA, private provider agency/landlord and the youth should coordinate and agree upon the number of roommates that are permissible and commensurate with the size of the apartment.

Apartments may be community or provider-based and privately or publicly owned and operated. Non-minor youth may also be assisted in securing their own apartment and the lease may be in the name of the county or non-minor youth. For non-minor youth approaching the end of their adjudication, this, in combination with secured employment, may be a realistic approach to securing a smooth and successful transition from foster care.

Based on the youth's capacities and needs as documented in the case plan, the agency can pay the landlord directly for rent or pay the youth directly and hold them responsible for paying rent. Additional information on payments is included under the "Foster Care Maintenance Payments and Other Costs for U-SILP Placement Settings" section of this bulletin.

iii. Higher Education on-Campus Residences or Dorm Living

For many non-minor youth attending higher education, dorm living is an affordable and developmentally appropriate living setting. Dorm settings are considered an U-SILP setting. Non-minor youth attending a higher education institution **in or out** of state, and living in an on campus residence or dorm qualify for SILP setting reimbursements. Because the non-minor youth may also need placement during holidays and summer breaks, a portion of the foster care maintenance payment may be provided to another approved placement setting, to include a biological parent's residence, to ensure provision of an appropriate living arrangement when school is not in session. Students not residing in an on-campus or dorm setting, regardless of the reason, may consider other L- or U-SILP settings such as apartments or host homes.

AFCARS reporting for youth residing in higher education settings is as follows:

- SIL - When the county is not paying to hold bed space for the youth or the youth is not planning to return to the previous placement setting.
- Other AFCARS settings – when the county is paying to hold bed space for the youth to return to placement setting at holidays or breaks.

Requirements for Program Description for SILP Arrangements

The following requirements pertain to SILP settings (TLR as indicated) to assess the youth's readiness, the supervision or monitoring of the setting, and the supportive services that will improve the successes of the placement setting for youth.

A. Assessment

The provider or CCYA overseeing a SILP or TLR setting must ensure that the youth participates in an assessment that demonstrates a youth's readiness and appropriateness for the setting selected. The assessment may identify additional supports that a youth needs to be successful in a particular setting. The assessment should take into account the particular setting or settings being considered. For example, a youth who is not yet ready to live in an apartment on their own may be ready to live in an apartment with a roommate, in a host home, or in an apartment with more staff supervision or monitoring. In assessing a youth's readiness for a setting, efforts should be made to identify with as much specificity as possible what settings would be the most appropriate for the youth and the array of services they need to succeed. Many youth between the ages of 16 and 21 should be appropriate for TLR or some level of SILP, even if supports are required. The results of the assessment and the youth's needs should be incorporated into the child's permanency plan, IL plan and/or transition plan.

For more information, see Appendix X: Sample SILP Readiness Assessment Tool

B. Supervision or Monitoring of Placement Settings

Supervision or monitoring can be provided in different ways based on the setting selected. Agencies must provide a youth with an individualized level of supervision commensurate with the youth's needs and consistent with the youth's permanency plan and independent living goals. As a youth gets closer towards independence, supervision should be reduced. In all cases, 24 hour crisis intervention and support must be made available for youth.

C. Supportive Services

Agencies must ensure that the youth is provided with supportive services in the following areas: life skills instruction and counseling; educational support and progress; employment preparation and placement; development and maintenance of support networks, including family; health and wellness; and housing search and placement. The determination of what particular services will be delivered and how they will be provided will be based on the youth's assessed needs and their input will then be reflected in the goals set in the youth's permanency plan, IL plan and/or transition plan. Provision and delivery of supportive services shall be coordinated with the local IL program and the CCYA. CCYA and private provider agencies

should collaborate with other community agencies and providers to meet the needs of all youth, including those with special needs who can thrive in SILP settings with additional community supports.

Foster Care Maintenance Payments and Other Costs for SILP Settings

The items of cost in the Title IV-E foster care maintenance payment definition are the same for a youth of any age. Payments must be paid through a foster parent or provider agency (i.e. child-placing/caring agency or residential program) unless the youth is age 18 or older, and living independently in an U-SILP setting in which no actual provider is involved. In those situations, CCYA may pay the foster care maintenance payment directly to the non-minor youth. The U-SILP payment should consider, at a minimum, the following needs of the non-minor youth and their child, if applicable: food, clothing, shelter, and personal incidentals. Payments made directly to the non-minor youth 18 or older should be negotiated by CCYA, or provider agency, based on the youth's individualized needs. Payments made directly to youth 18 and older living in an U-SILP, and where no provider is involved, may not exceed the current foster care maintenance payment and may not be used to support other individuals residing in the setting. CCYA should use other available resources, which may include county funds, Chafee Room and Board funds, or Special Grant Housing funds, for one time or start-up expenses, such as: rent or utility deposits, cooking equipment, eating utensils, furnishings, etc. (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.)

5. Age Appropriate Rules, Roles, and Responsibilities

Efforts to apply age or developmentally-appropriate rules, roles and responsibilities for **all placement settings** are essential to the successes and ongoing development of youth most likely to remain in care until age 18, or youth requesting to extend or re-enter care up to age 21. (This is also commonly referred to as supporting normalcy for youth in foster care.) 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 successful adulthood. Overall, agencies should encourage rules, roles, and responsibilities that are generally accepted as suitable for youth of the same chronological age or level of maturity or that are determined to be developmentally-appropriate for a youth, based on the development of cognitive, emotional, physical, and behavioral capacities that are typical for an age or age group 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 vacations, sleepovers and other rites of passage should be allowed and encouraged.

For more information, see Appendices D: Sample Drivers Permit and Licensing Policy and T: Independent Living Resources on the Internet, Youth Fostering Change, and Teen Success Agreement.

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 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 intellectual disability 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 complement 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

9. Juvenile Act Amendments

The amendments to the Juvenile Act that pertain to youth eligible to receive IL Services are as follows.

Act 91 of 2012 amends § 6302 (relating to definitions) to read in part:

“Child.” An individual who:

(3) is under the age of 21 years and was adjudicated dependent before reaching the age of 18 years, who has requested the court to retain jurisdiction and who remains under the jurisdiction of the court as a dependent child because the court has determined that the child is:

- (i) completing secondary education or an equivalent credential;
- (ii) enrolled in an institution which provides postsecondary or vocational education;
- (iii) participating in a program actively designed to promote or remove barriers to employment;
- (iv) employed for at least 80 hours per month; or
- (v) Incapable of doing any of the activities described in subparagraph (i), (ii), (iii), or (iv) due to a medical or behavioral health condition, which is supported by regularly updated information in the permanency plan of the child.

The revised definition of “child” exercises the option of section 475(8)(B) of the Social Security Act regarding Title IV-E eligibility and the Fostering Connections legislation. This enables agencies and youth to receive Title IV-E reimbursement for eligible dependent youth up to age 21. The law specifies and expands the activities that youth can engage in and remain in care past age 18. Youth are only required under the law to meet one of the criteria to remain in care.

It is recommended that CCYA and courts apply the education and employment conditions to the broadest population possible consistent with the law to ensure that there are ample supports for older youth. Programs to remove barriers to employment may include activities such as classes on resume writing, interviewing and employment search skills, participation in activities in an IL Program, Job Corps, etc. Further, youth on semester, summer or other educational breaks must be considered enrolled unless there is clear contradictory evidence which must be provided to the court. The employment criteria can include a youth with a part-time or full-time position, multiple

positions and unpaid or paid internship or apprenticeship (to include volunteer work.) Youth enlisted in the military or married may continue to receive a foster care maintenance payment. CCYA are responsible to verify or obtain assurances that the youth continues to meet the education or employment conditions for presentation to the court at the permanency hearing.

For more information, see Appendix J: Sample Permanency Hearing Education/Employment Verification

Finally, the definition requires youth meet only one of the established criteria at any given time and allows youth to transition from one criteria of eligibility to another during their agency placement. One example is a youth completing high school in June, working 80 hours per month through December and entering a trade school in January. Another example is allowing an 18 year old youth to remain in substitute care after losing employment by enrolling them in an IL Program or other program targeted at promoting or removing barriers to employment. In all circumstances CCYA are expected to actively work with youth to help them meet the definition of child, or maintain their status as a child under the law, so long as the youth is expressing a desire to maintain or resume dependency jurisdiction.

Act 91 of 2012 amends §6351 by adding the following:

§ 6351. Disposition of Dependent Child.

(E) Permanency Hearings.

(3) The court shall conduct permanency hearings as follows:

(III) if the court resumes jurisdiction of the child pursuant to subsection (J), permanency hearings shall be scheduled in accordance with applicable law until court jurisdiction is terminated, but no later than when the child attains 21 years of age.

(F) Matters to be determined at permanency hearing. At each permanency hearing, a court shall determine all of the following:

(8.1) Whether the child continues to meet the definition of "Child" and has requested that the court continue jurisdiction pursuant to section 6302 if the child is between 18 and 21 years of age.

(8.2) That a transition plan has been presented in accordance with section 475 of the Social Security Act (49 Stat. 620, 42 U.S.C. § 675 (5)

(H).

(J) Resumption of Jurisdiction. At any time prior to a child reaching 21 years of age, a child may request the court to resume dependency jurisdiction if:

(1) The child continues to meet the definition of "Child" pursuant to section 6302; and

(2) Dependency jurisdiction was terminated:

(I) within 90 days prior to the child's 18th birthday; or

(II) on or after the child's 18th birthday, but before the child turns 21 years of age.

Those youth whose dependency jurisdiction was terminated between 18 and 20 years of age and who meet the definition of child may request the court to resume dependency jurisdiction up to and including entry or re-entry into substitute care as a non-minor dependent provided they meet the definition of "child" and dependency jurisdiction was terminated within 90 days prior to their 18th birthday or on or after their 18th birthday. The purpose of resumption of jurisdiction is to allow youth who are not adequately prepared for adulthood, or whose transition plan falls through, to have a comprehensive safety net and resume receiving the full array of placement and support services. Resumption of jurisdiction does not require entry or re-entry into substitute care. CCYA are encouraged to make all service options accessible to eligible youth in need of assistance. Youth requesting to enter agency placement and care responsibility may enter into a voluntary placement agreement and take any necessary actions to meet the definition of child prior to obtaining court jurisdiction. CCYA are expected to actively work with youth to help them meet the definition of child so long as the youth is expressing a desire to resume dependency jurisdiction. This could include enrollment in the CCYA IL program so long as it is targeted at promoting or removing barriers to employment; a program designed to improve interview, job search and resume writing skills to obtain employment.

The new language at §6351 requires that permanency hearings must be held at least every six months for youth age 18-21 who resume dependency jurisdiction until court jurisdiction is terminated. It also requires that at each permanency hearing, the court must make a determination regarding whether the youth continues to meet the definition of "child". It is recommended that the agency and youth prepare information or documents to support the youth's request to continue jurisdiction. At each permanency hearing the court must also determine that a transition plan has been presented in accordance with Section 475 of the Social Security Act. A transition plan must be developed during the 90-day period before the youth is expected to discharge from extended substitute care.

For more information, see "Transition Planning" on page 20 and Appendix V: Sample 90 Day Transition Plan for more information

The CCYA should consider the following as they implement these amendments to the Juvenile Act:

- Title IV-E eligibility for youth entering substitute care after age 18 is based on the non-minor dependent's income, not their family's. Employment earnings may impact this determination. If so, state and local funds may be used for placement costs. The reimbursability of youth over 18 must be monitored; redeterminations must occur every six months.
- Resumption of jurisdiction is retroactive from July 5, 2012 for youth who have not attained age 21. Any youth currently under 21, meeting the definition of child who had their dependency jurisdiction terminated by the court within 90 days prior to, on, or after their 18th birthday request the court to resume dependency jurisdiction – even if their dependency jurisdiction was terminated prior to July 5, 2012. CCYA should notify all casework staff of this information.

- Youth who have children of their own and meet any one of the five criteria are eligible for re-entry to foster care. The agency should not request jurisdiction of the non-minor dependent's child unless dependency needs exist.
- The resumption of jurisdiction provision provides non-minor dependents with an opportunity to focus on activities designed to improve their outcomes and become healthy, productive citizens, rather than face the realities of homelessness, sexual and physical violence, involvement with the criminal justice system, no or low income and more. This provision should be interpreted to achieve the purpose of improving outcomes for youth transitioning from the child welfare system to adulthood.
- Participation in IL Services, while voluntary, should be encouraged for non-minor dependent youth. Periodic attempts to engage the youth should continue through their duration in agency placement and care responsibility.
- Placement settings should foster a growth to independence as opposed to being overly restrictive.
- Solicitation of feedback from youth and the PA Youth Advisory Board on ways to design programming, service delivery, provide outreach, and educate caseworkers, Guardian Ad Litem, and the courts to best meet the needs of youth requesting assistance by returning to agency care.
- The court determines if the youth is meeting the definition of child for the purpose of resuming or terminating dependency. The county may not discontinue services or suspend the foster care maintenance payment for a dependent youth until the court determines the youth is not meeting the definition of child and terminates dependency. The county may consider petitioning the court prior to the scheduled permanency review hearing if the capable youth is unwilling to meet the definition of child criteria.

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 the opportunity to receive IL services. In particular, CCYA must ensure that older youth placed in residential treatment facilities have the opportunity to 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 and opportunities to actively practice skills, such as cooking, laundry tasks and budgeting 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 CCYA 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) annual credit report review, 6) transition planning and 7) aftercare services (see page 35.)

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 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, if not otherwise assigned, to comply with annual credit reviews of foster youth ages 16 and older;
- Supportive contact to ensure that all agency youth exiting foster care on or after age 18 and receiving Medical Assistance coverage are informed about their continued eligibility for Medical Assistance and how to maintain this coverage until age 26;
- Contact person with OCYF and the 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 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. For youth who enter substitute care after age 16 or resume dependency jurisdiction after age 18, their IL needs should be assessed within 30 days. 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 as part of the Child's Permanency Plan (CPP) for every youth who is age 16 or older, including those youth who resume dependency jurisdiction and enter or re-enter agency placement and care responsibility. 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. The county may petition the court prior to the scheduled permanency review hearing if the capable youth is unwilling to meet the definition of child criteria.

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;
- Documentation that the youth was instructed about the importance of, and was provided, assistance to identify, a Health Care Power of Attorney or Health Care Proxy; including documentation that the youth is not competent to make their own health care decisions (this may include youth with intellectual disabilities or significant cognitive impairments);
- A signed copy of the youth's grievance policy and contact information.

- Documentation of credit history reviews from each of the three credit reporting agencies for each year a youth is in foster care age 16 and older and any actions taken to resolve or correct inaccurate credit history reports;
- Documentation that the youth was notified that they may request the court to remain in care until age 21 if meeting the definition of child;
- Documentation that the youth was notified that at any time prior to age 21 years of age, they may request the court to resume dependency jurisdiction, up to and including entry or return to agency placement and care responsibility as a non-minor dependent until age 21 provided they meet the definition of child and dependency jurisdiction was terminated within 90 days prior to their 18th birthday or on or after their 18th birthday;
- Documentation that the youth was notified of their eligibility for Medical Assistance until age 26, if they were discharged any time on or after their 18th birthday and receiving Medical Assistance; 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 with the private provider.

The following items may be useful to staff providing services and, if applicable, are 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 addresses, cell phone numbers and phone numbers of person(s) with whom the youth will remain involved and are not included in the youth's grievance policy documentation;
- 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; and
- Youth reporting forms for PA IL Outcomes Tracking System (PILOTS).

For more information, see Appendices H: Sample IL Plan and 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 youth will be discharged from substitute care between the ages 18 and 21, CCYA must "provide the child with assistance and support in developing a Transition Plan that is personalized at the direction of the youth, 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)). In addition to developing a Transition Plan for youth leaving substitute care, OCYF recommends that CCYA develop a Transition Plan for youth who resume dependency jurisdiction while receiving in-home and/or IL Services in order to help them successfully transition to adulthood. CCYA may choose to develop a formal Transition Plan that is presented to the Court at any time prior to the 90-day requirement. However the Transition Plan must be revisited and updated, as necessary, with the youth during the 90-day period prior to the date the youth will be discharged from substitute care between the ages 18 and 21. Ensuring that an up-to-date CPP, IL plan and Transition Plan are in the youth's case record will help CCYA meet this requirement. The requirement for a transition plan should not be a rationale to discharge youth prior to age 18.

The ACA 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)). This requirement includes ensuring that youth with significant disabilities that prevent them from making important legal decisions as adults are provided the appropriate services, including legal advocacy.

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 Rules outline the process utilized by courts to terminate court supervision of dependent children 18 years of age or older, including the 90 day transition plan and corresponding court review.

To assist counties in meeting the federal requirements, OCYF formed a small workgroup consisting of state and county employees, provider agencies, 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. 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 the date the youth is referred for IL Services, whichever is earlier. The Transition Assessment tool may be completed on paper or as an electronic document.

For more information, see Appendix U: Sample Transition Assessment

90 Day Transition Plan

The 90 Day Transition Plan 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.

For more information, see Appendix V: Sample 90 Day Transition Assessment

Key Transition Documents

The following documents are to be provided to youth who discharge from substitute care on or after age 18.

- Birth Certificate
- Social Security Card
- State Photo ID, Driver's License or U.S. Passport
- Health Information/Medical records including immunizations
- Health Care Power of Attorney or Health Care Proxy

- Educational information/records
- Copy of IEP (if applicable)
- Copies of any Credit History Reports
- Medical Access Card (if applicable)
- CY60 – Proof of former foster care status and Medical Assistance Coverage (if discharged after age 18)
- Social Security Benefits
- Family/Tribal contact information
- Immigration documents
- Legal documents relating to custody or guardianship
- Court Review and Court Order
- Selective Service Registration (males only)
- Voter Registration
- Life Book (if applicable)

Credit History Review and Resolution

Building and maintaining a strong credit history is crucial for all young adults. Information on credit reports is used to evaluate applications for purchases by credit, employment, insurance and renting an apartment. Increasingly, foster youth face instances of poor credit as a result of identity theft and are not adequately prepared to understand or dispute credit fraud without assistance. Minor children do not usually have the legal capacity to sign a contract or apply for credit on their own. Most youth do not have credit reports or histories. If a credit report does exist, it may be due to error, fraud or identity theft.

Section 475(5) of the Social Security Act (42 U.S.C. 675(5)) is amended by adding the requirement that “each child in foster care under the responsibility of the State who has attained 16 years of age receives without cost a copy of any consumer report (as defined in section 603(d) of the Fair Credit Reporting Act (FCRA)) pertaining to the child each year until the child is discharged from care, and receives assistance (including, when feasible, from any court-appointed advocate for the child) in interpreting and resolving any inaccuracies in the report.”

The FCRA promotes the accuracy and privacy of information in the files of the nation’s credit reporting agencies (CRA). Effective October 1, 2011, the FCRA and CFSIIA require that the CCYA obtain a credit report from each of the three CRA once every 12 months for every youth in foster care age 16 and older. The FCRA or CFSIIA do not require agencies to request a credit score for foster youth.

CRA, also known as credit bureaus, are organizations that collect and aggregate credit and personal information about consumers. Each consumer’s information is tracked by their Social Security Number. The three national CRA are: Equifax, Experian and TransUnion.

For contact information and agency-specific requirements, see Appendix W: Credit History Review and Resolution

In order to ensure that foster youth are not victims of identity theft and have a clear foundation for which to build a strong credit history as a young adult, a three-step process is required:

1. Obtain a credit history report from each CRA, if available (in most cases the CRA will confirm that no such credit report exists);
2. Share the results of the credit history review with the youth;
3. Identify inaccuracies and provide assistance for resolution (including, when feasible, from any court-appointed advocate for the youth.)

It is recommended that CCYA identify at least one agency staff person to assure the agency's compliance with the FCRA. For example, a CCYA clerical or non-casework staff person may be assigned the task of obtaining the credit history. However, it is recommended that sharing the results of the review with the youth should be performed by casework, IL staff, and/or the youth's Guardian ad litem (GAL.) In cases where credit resolution is required for a youth, the CCYA may solicit appropriate assistance, including notifying the youth's GAL and/or the agency's solicitor while continuing to maintain oversight responsibilities.

In addition to meeting the requirements of federal law it is recommended that CCYA initiate these activities for former foster youth who are receiving Independent Living services.

For more information, see Appendix W: Credit History Review and Resolution

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 ensure 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 Casey Life Skills Assessment, however, other assessment tools such as the Child and Adolescent Needs and Strengths (CANS) may be beneficial and used as supplements. The Casey Life Skills assessment tool is available at no cost and staff training is available from the PA Child Welfare Resource Center (CWRC).

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 everyday 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 through testing or 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.

Family Group Decision Making/Family Group Conferencing/Teaming can supplement a formal assessment.

B. Life Skills Training

This service area includes programs and services designed to teach the necessary skills to assist youth in effectively functioning 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 everyday 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;
- Understanding and managing personal credit (to include the annual credit report results for each youth age 16 and older in substitute care);
- 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 having a health care power of attorney or health care proxy, health care insurance coverage and 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 when they have not received appropriate instruction and supportive opportunities to practice soft skills or abilities to cope when addressing crises. While Pennsylvania now allows youth meeting the criteria to resume dependency jurisdiction, the delivery of soft skills services 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

The McKinney-Vento and Fostering Connection Acts require both CCYA and local education agencies to collaborate to ensure that school changes are minimized and that youth in placement who change schools are promptly enrolled. It is expected that a greater emphasis will be placed on assessing the education needs of all youth and ensuring follow-through with needed services in order to improve outcomes. With the exception of the use of the Education Screen, caseworkers are required to comply with all elements covered in OCYF Bulletin 3130-10-04 Educational Stability and Continuity of Children Receiving 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 or has received a GED. School stability is important to educational success and CCYA and school districts are encouraged to closely collaborate on all matters related to school stability. Youth have the legal right to remain in their "home" school when they enter into placement or when they change placements, and doing so is in their best interest. When the youth qualifies under the requirements of the McKinney-Vento Act, transportation to that school must be provided and funded by the school district. Youth also have a right not to be in an 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) unless statute and regulation have been followed and the youth has been given their due process protections, including the right to challenge the educational placement decisions. 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;
- Ensuring that all youth have identified educational decision makers or are taking appropriate action, such as requesting a court appointment, if no one is identified;
- Tutoring or other supplemental education;
- Support and advocacy for vocational training and post-secondary education;
- Advocacy around special education services and accommodations for youth with disabilities or special needs in post-secondary programs;
- 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 in obtaining all available financial aid for vocational training and post-secondary education; and
- Monitoring or mentoring services to improve retention in postsecondary programs, including ensuring 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.) and programs to overcome barriers to employment;
 - Educational issues (relating to peers/teachers, discipline issues, tardiness); and/or
 - Emotional/therapeutic concerns.
- SWAN Units of Service:
 - Child profile;
 - Family profile;
 - Child preparation; or
 - Child specific recruitment.

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 IL 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 directed towards a youth's plan to achieve normalcy. Examples include, but are 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 being 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 for youth in substitute care, including SILP and foster care maintenance payments (see page 12.) The amount and duration of stipend payments to youth in or out of substitute care should be commensurate with identified need and restricted to cover allowable costs after the CCYA determines that all other youth eligible and generated resources have been exhausted. Stipends should not be regular or ongoing payments.

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 amount 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;
- Overcoming barriers to 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. CFCIP Room and Board funds may also be used to meet one-time or startup expenses for youth ages 18-21 who opt to remain in, or re-enter, foster care and for whom the court resumes dependency jurisdiction. However, these funds may not be used to supplement personal incidental

costs (food, clothing, and shelter) of a SILP setting or current foster family care per diem rate. Federal requirements limit the amount of federal CFCIP funds that may be expended for Room and Board to 30 percent of the state's allocation of federal funds. OCYF will manage the 30 percent maximum at the state level to allow interested counties to budget and expend more than 30 percent of their federal allocation. 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	✓
Extended agency care beyond age 18, or resumed dependency jurisdiction prior to age 21.	✓	✓

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 or Special Grant Housing funds preclude the youth from remaining in, entering, or re-entering substitute care should the youth need or desire the level of support that substitute care can provide. There may be circumstances where it is appropriate for CCYA to use CFCIP room and board or other funds for eligible youth who are awaiting resumption of dependency jurisdiction.

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 Room and Board payments at any time. Up to age 21, the youth retains eligibility to request consideration to receive the same services previously offered. 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, CCYA should 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. Housing resources do not include birth or adoptive parents. 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.

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 20 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 unless using state and local funds. CCYA should consider the needs of youth who may be awaiting resumption of dependency

jurisdiction. Youth are not required to meet the required elements listed below for emergency room and board services.

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 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 18-21 years of age and have exited substitute care after age 18, even if a dependency petition remains open;
- Be offered the option to request the court to re-enter agency care as a non-minor dependent;
- 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

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. CCYA 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 at age 16 or older 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 is 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. Youth should also participate in the creation of a Transition Plan to facilitate a successful transition from agency services. The aftercare services provided to an individual youth by the former foster family, group home or institution, the county agency or the contracted provider must be described in the youth's IL/CPP.

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 and resumption of jurisdiction/foster care re-entry information and availability at the onset of services. Youth must also be re-informed of

these services and supports (as applicable) 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