



Outcome Measures and Oversight Activities of the Independent Living Transition Services Program Report

January 31, 2011

Department of Children and Families
Office of Family Safety

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Secretary

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Overview

The requirement to submit this legislatively mandated report is found in section 409.1451(6), Florida Statutes.

This report provides information as required by the statute in the following major content areas:

- A) Outcome Measures;
- B) Departmental Oversight; and
- C) Rule Promulgation.

The majority of activities described in this report occurred during the period January through December 2010 unless otherwise noted.

Authority

Section 409.1451(6), F.S.

“The Department shall prepare a report on the outcome measures and the Department’s oversight activities and submit the report to the President of the Senate, the Speaker of the House of Representatives, and the committees with jurisdiction over issues relating to children and families in the Senate and the House of Representatives no later than January 31 of each year. The report must include:

(a) An analysis of performance on the outcome measures developed under this section reported for each community-based care lead agency and compared with the performance of the Department on the same measures.

(b) A description of the Department’s oversight of the program, including, by lead agency, any programmatic or fiscal deficiencies found, corrective actions required and current status of compliance.

(c) Any rules adopted or proposed under this section since the last report. For the purposes of the first report, any rules adopted or proposed under this section must be included.”

A. Outcome Measures for Community-Based Care Lead Agencies

Community-Based Care Outcome Measures

For several years, the Department of Children and Families (the Department or DCF) has maintained a Performance Measures Workgroup, comprised of DCF and Community Based Care (CBC) representatives. This Workgroup provides oversight and guidance on development of CBC contract measures, recommends measurement methodologies and assesses the validity of data sources for statewide comparison of performance. The Performance Measurement Workgroup is also the focal point for development of baselines and standards for outcome measures specific to the Independent Living Program.

The workgroup reviewed the youth outcome reports of other agencies to develop the best approach for implementing outcome measures specific to the Independent Living Program. This included the Florida Office of Program Policy, Analysis, and Government Accountability Report 04-78 entitled "*Independent Living Minimum Standards Recommended for Children in Foster Care*," the *2006 Annual Report of the Independent Living Services Advisory Council*, and the February 2008 Federal Rule for the National Youth in Transition Database. Each of these reports contained recommended youth outcome measures and they were compared to determine similarities and differences. As a result, nineteen (19) potential indicators were identified by the workgroup.

In March 2010, the workgroup selected five (5) performance outcome measures to be included in the community-based care lead agency contracts for FY 10-11. The measures will be included as "baseline" measures; i.e., while performance will be tracked on these measures, it will not be considered in assessment of CBC performance until FY 11-12. Rather, performance results will be used to set targets for FY 11-12, at which point, CBCs will be judged by their performance on these measures.

The performance outcome measures selected are:

1. Percentage of youth who have aged out of care completing high school or General Educational Development (GED) Program by 20 years of age.
2. Percentage of youth who have completed high school or GED and are involved in post secondary education.
3. Percentage of youth ages 18 and over receiving Independent Living services who have a job (including the military).
4. Percentage of young adults in safe housing.

5. Percentage of 17 year olds in licensed out-of-home care who had a transition plan signed by the youth and filed with the court.

The data for state fiscal year FY 10-11 will provide the baseline for establishing the targets to be included in FY 11-12 CBC lead agency contracts.

Independent Living Transitional Services Critical Checklist

In order to implement a system of outcome measurement, the Department, in collaboration with the Independent Living Services Advisory Council, developed and implemented a checklist survey specific to independent living services, called the Independent Living Transitional Services Critical Checklist. Beginning in July 2007 and in partnership with the community-based care lead agencies, the Department collected and compiled data on youth in foster care, ages 13 through 17, and young adults formerly in foster care, ages 18 through 22, in the areas of: life skills; housing; education; employment; Department of Corrections or Juvenile Justice involvement; case planning; Aftercare Support Services; and Transitional Support Services. A summary of the data compiled as of January 2009 is located at the following website: <http://www.dcf.state.fl.us/indliving/>.

During spring 2008, the Department solicited feedback from advocates, stakeholders, community partners, youth, and others in order to improve the checklist. For the most part, the data elements of the checklist remained consistent in order not to negatively impact the ability to use data collected in July 2007 as a baseline, as this provides the Department with the ability to compare and contrast data from year to year.

All community-based care lead agencies voluntarily implemented the use of the checklist. Community-based care lead agencies' contracts were later modified so the checklist would be completed each year within 45 days after a youth or young adult's birthday. The Department anticipates the 2010 annual report to be completed by March 2011.

National Youth in Transition Database

In February 2008, the final federal rule for the Chafee National Youth in Transition Database was promulgated. Similar to Florida's Independent Living Transitional Services Critical Checklist, the National Youth in Transition Database, commonly referred to as NTYD, requires states to engage youth in reporting their own perceptions of the services provided to them. Additionally, each state must report on all services provided to youth in foster care, and young adults formerly in foster care every six months in the following areas: academic support; post-secondary educational support; career preparation; employment programs or vocational training; budget and financial management; housing education and home management training; health education and

risk prevention; family support and healthy marriage education; mentoring; and supervised independent living.

In October 2010, the Department began collecting the data as required under NYTD, and the first data report will be sent to the federal Administration for Children and Families in spring 2011.

Florida Safe Families Network

In October 2010, the Statewide Automated Child Welfare Information System (Florida Safe Families Network – FSFN) was updated to capture a ‘NYTD Reporting Group’ on each Service Type recorded in FSFN. This update was needed to satisfy the federal reporting requirement of the NYTD services provided to youth in foster care and young adults formerly in foster care.

B. Departmental Oversight

For calendar year 2010, the Department provided oversight of independent living services through a two part system. The Department’s Contract Oversight Unit was responsible for monitoring the community-based care lead agencies’ compliance with s. 409.1451, F.S., and Florida Administrative Code, 65C-31, Services to Young Adults Formerly in the Custody of the Department. The Regional Quality Assurance System also conducts in-depth evaluations and assessments of services to ensure they are in compliance with federal standards and requirements of the federal Child and Family Services Review.

Programmatic Oversight

Community-Based Care Lead Agency Contract Oversight

In 2010, the Contract Oversight Unit randomly selected cases of youth eligible to receive independent living services and young adults formerly in foster care and conducted a file review to determine if the requirements in Florida Statute and Florida Administrative Code were met. This included a review of eligibility requirements for these services.

Deficiencies in cases or areas of concern were noted in reports prepared and submitted to the Department’s contract managers and Department leadership. The contract managers then determined if the deficiency warranted a corrective action plan (CAP). If a CAP was necessary to address concerns, the community-based care lead agency was required to develop steps and processes to bring services into compliance with federal regulations, Florida Statute, Florida Administrative Code, and the contract terms and conditions.

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Table 1 summarizes the monitoring of the community-based care lead agencies for the 2010 calendar year, and the action taken by the Department to address deficiencies.

Table 1: Contract Oversight Results of the Independent Living Program by Community-Based Care Lead Agency				
Circuit	CBC	Contract	Identified Areas of Deficiency (Specific to IL Services)	DCF Response (Specific to IL Services)
1	Lakeview Center, Inc. (Families First Network)	AJ481	Some Independent Living requirements were not met.	Corrective Action Plan was completed.
2, 14	Big Bend CBC	BJS01 and BJU01	Independent Living requirements were not met.	Correction Action Plan was completed.
3, 8	Partnership for Strong Families	CJ809	Independent living requirements were not met.	No Corrective Action Plan is required.
4 (St. Johns)	St. Johns County Board of County Commissioners	NJ204	Some Independent Living requirements were not met.	Corrective Action Plan was completed.
4	Family Support Services of North Florida	DJ9031	Independent Living requirements were not met.	Corrective Action Plan was completed.
5	Kids Central, Inc.	PJH04 and PFZ04	Some Independent living requirements not met.	No Corrective Action Plan is required.
6	Eckerd Youth Alternatives, Inc.	QJ9B6	Independent Living requirements were not met.	Corrective Action Plan is in place.
7	Community Partnership for Children	NJ195	Some Independent Living requirements were not met.	No Corrective Action Plan is required.
9	Family Services of Metro- Orlando	GJ160	Independent Living requirements were not met.	Corrective Action Plan is in place.
10	Heartland for Children	TJK01	Independent Living requirements were not met.	Corrective Action Plan is in place.
18	CBC of Seminole	GJK45	Some Independent Living requirements were not met.	No Corrective Action Plan is required.
18	CBC of Brevard	GJK46	Some Independent Living requirements were not met.	Corrective Action Plan is in place.
19	United for Families	ZJK84	Some independent living requirements were not met.	No Corrective Action Plan is required.
20	Children's Network of SW Florida	HJ90R	Some Independent Living requirements were not met.	Corrective Action Plan is in place.

Quality Assurance for All Community-Based Care Lead Agencies

In November 2010, an annual quality assurance report, Child Welfare Services Statewide Quality Assurance Report, was published providing an assessment of the quality of practice of case management services. This was a comprehensive review of 1,575 case management files including case work information contained in the FSFN for the time period of July 1, 2009 through June 30, 2010. Quality Assurance (QA) staff from the Department and from community-based care lead agencies reviewed child welfare cases to assess practice for independent living services in the following areas:

- The transition to self-sufficiency for older children who continue to be in foster care as adolescents.
- The preparation of young adults that exit foster care at age 18 to make the transition to self-sufficiency as adults.

Child welfare case work practice encompasses the range of activities designed to strengthen family functioning and address challenges that may threaten family stability. These activities include family centered assessment and case planning; case management; specific interventions with families including counseling, education, and skill building; advocating for families; and connecting families with the supportive services and resources they need to improve their parenting abilities and achieve a nurturing and stable family environment. Good case work practices increase the likelihood that optimal outcomes can be achieved. Each practice impacts the other, and if poor performance is noted in one area, the likelihood for success overall decreases. One of those activities was: Independent Living Assessment and Planning

Independent Living Assessment and Planning relates to older children and youth in licensed care who should receive independent living services to prepare them for self-sufficiency in adulthood.

Independent living assessments beginning at 13 years of age are intended to address the teen's individual needs, life skills, education, and social skill development in order to prepare them for the future, and especially for the teen to live independently if he/she ages out of foster care upon reaching 18 years of age. While in foster care, however, the expectation is that the teen can live as much of a normal life as possible while preparing for transition. Education and career paths, normalcy, and transitioning standards were added to the quality assurance reviews for State Fiscal Year 2009/2010, so the data for these three practices is baseline data. Additional information can be found in the Independent Living Special QA Review Reports for Phase I (dated September 2009) and Phase II (dated June 2010). These reports can be viewed at the website for the Florida Center for the Advancement of Child Welfare Practice: http://centerforchildwelfare.fmhi.usf.edu/qa/SpecialQA_Reviews/Forms/AllItems.aspx.

In 2010, as part of the QA review process, eight (8) Youth Perspective Roundtables were facilitated across the state. The purpose of the Youth Perspective Roundtables was to learn from youth in foster care and empower them to talk about their challenges, needs, feedback, and recommendations that could improve child welfare practice and the quality of the foster care system. The Youth Perspective Roundtables consisted of a series of discussions with youth in foster care, ranging in age from 13 years to 22 years. A youth who was currently in foster care led each group in a 90 minute discussion that focused on six areas: placement, education, transportation, services, independent living, and community resources. Within each area, the youth:

- 1) Identified “important people” in their lives and defined their characteristics; my mother, father, pastor, caseworker, etc.;
- 2) Described their feelings about being “in care” and “out of care” and the process of (or expectations for) transitioning to adulthood; and
- 3) Brainstormed ways in which their experience in foster care might be “changed,” with a focus on ways of strengthening relationships.

Children in foster care are particularly vulnerable as they often come into state care traumatized due to their exposure to maltreatment, family instability, and a number of other risk factors that compromise their healthy development. Children in care may be witnesses to, and victims of, family violence, or may have been subjected to inadequate and impaired caregiving that resulted from a variety of parental issues, such as substance abuse, mental illness, and developmental disabilities. Moreover, these children are predominantly from impoverished backgrounds, a situation that intensifies the risk factors they experience. Youth and young adults who are either currently in foster care, or who have recently aged out of foster care, must be empowered to have a voice in the child welfare system.

The more information the Department receives from youth, the better its ability to improve services. An interesting dynamic developed in one area where there was a sibling group of four youth who were 17-24 years of age. All four children grew up in foster care. One youth, age 24, and another who was 20, talked about all the supports, guidance, and resources they did not have as compared to their younger siblings; who felt they were receiving these supports and resources. The youth acknowledged how much progress Florida has made in helping youth prepare to live independently. The results of the youth perspective about the child welfare system are summarized below. This information should be used at the local level to improve practice.

1. There is generally a lack of discussion between the youth and the case worker about placement options.
2. Youth understood that they could not always be placed with a sibling. Their concern was the failure of foster parents or case workers to help them keep connected with a sibling who was also in foster care, through visits and telephone calls.
3. Youth struggle to stay caught up in school because many times they are moved and must change schools. Although recognizing some placement moves were due to their acting out behavior, school was a safe place that offered stability in their life. The loss of school, teachers, and friends made them feel unsafe again.

Youth who turn 18 while in high school are fearful about losing their foster care placement prior to graduation.

4. Youth acknowledged that many of them have mental health issues. They felt foster parents needed to be better prepared to handle their behavior. Furthermore, youth did not understand their diagnosis, their behaviors, or treatment with medication. Although generally told their diagnosis, no one explained it to them in age appropriate terms. Youth believe that when foster parents don't understand the diagnosis, there is a risk of placement failure when the youth acts out.
5. Youth expressed concern that caseworkers frequently change, forcing them to rebuild trust and relationships. They felt this impacted their case plan and goals for a permanent home.
6. Youth want mentors in the community who can be a permanent connection when they transition from foster care. Although they may have an independent living caseworker or Guardian ad Litem (GAL), they felt they needed someone outside of government that they could turn to in times of need.
7. Youth could not always participate in after school activities such as drama club, dance, football, and so forth due to lack of transportation. Youth were also concerned that they are unable to get a driver's license when they turn 16. Case workers and foster parents don't feel comfortable signing for underage youth.
8. Youth praised the Department's Independent Living Programs. They felt well supported by their Independent Living workers. They expressed concern about possible reductions in their Road to Independence payments. Some of the youth in group homes shared instances where rules prohibit driving, cooking, and sleepovers due to liability issues.

In summary, the youth who participated in the Youth Perspective Roundtables offered many insights into the child welfare system of care. Their thoughts and observations must be valued and used to improve practice in local systems of care. Their perspective and their voice are critical to improving practice as they are our primary customer. They know there are challenges but they want all future children entering foster care to always feel they are loved as part of a family.

To see the Child Welfare Services Statewide Quality Assurance Report in its entirety, please visit http://centerforchildwelfare.fmhi.usf.edu/qa/QA_Reports/StatewideQA_Rev-CMNov2010.pdf.

Quality Assurance Special Review of Independent Living

In January 2009, Florida's Youth SHINE, an advocacy group for children, youth and young adults within the foster care system, requested that then Secretary George Sheldon review their concerns over inequities and inconsistencies in service delivery systems throughout the state. In response, former Secretary Sheldon directed the Office of Family Safety to conduct a statewide review of the Independent Living Program to assess how well the program was currently operating and how it could be improved.

The Office of Family Safety has completed Phases I and II of three separate phases:

- Phase I – Process management of Aftercare Support Services, Transitional Support Services and Road to Independence Program for young adults formerly in foster care, i.e., young adults 18 and over.
- Phase II - Review of youth living in licensed out-of-home care who have reached their 17th birthday, focusing on their preparedness and planning for exiting care.
- Phase III – Quality of pre-independent living assessments and service provision for children 13 through 16 years of age. Both will involve interviews with the youth and children.

Phase I of the review was published in September 2009. This report can be viewed at: http://centerforchildwelfare.fmhi.usf.edu/qa/QA_Docs/QA_SpecialReview-IL_Program2009.pdf

Phase II of the review was published in June 2010. The Quality Assurance Independent Living Review Phase II: Age 17 Report focused on the quality of services being provided to foster care youth to prepare them for transitioning from foster care to adulthood upon reaching their 18th birthday. Two data gathering activities were conducted to assess process and practice related to youth who were 17 years of age in licensed out-of-home care:

1. Case file reviews were conducted on a randomly selected sample set of 159 youth statewide.
2. Interviews were conducted with 148 youth who were 17 years of age at the time of the review. Youth on runaway status and those who chose not to participate were not included.

Key findings in this report were:

1. Key statute and administrative code requirements are not being met in the following areas:
 - a. Judicial reviews within 90 days of the youth's 17th birthday (s. 39.701(7), F.S., and 65C-28, F.A.C.);
 - b. Case staffings at least 30 days prior to Judicial Reviews (65C-28, F.A.C.);
 - c. Independent living assessments within 30 days of the youth's 17th birthday (s. 401.1451, F.S.);
 - d. Reviews and updated Normalcy Plans quarterly (s. 39.013(8), F.S., and 65C-30.007, F.A.C.);
 - e. Staffings at least every six months until the youth's 18th birthday (65C-28, F.A.C.);
 - f. Judicial reviews within six months of the youth's 18th birthday (65C-30.013, F.A.C.); and
 - g. Providing assistance that will help youth apply for services they are eligible to receive as an adult within 90 days after reaching their 18th birthday (65C-009(9), F.A.C.).
2. There were gaps in the development of formal, individualized independent living plans. These plans did not consistently address appropriate education and career paths. In addition, activities did not consistently ensure the provision of services and training for identified needs.
3. Youth were not consistently assessed for Subsidized Independent Living services.
4. The quality of documentation in written reports varied.
5. There were concerns about the lack of coordination with the Department of Juvenile Justice for youth who are jointly served.
6. There was disparity in addressing the mental health and substance abuse needs of youth.

Although the review revealed that there are some performance gaps in preparing these youth to successfully exit the foster care system when they reach their 18th birthday,

some promising practices were also identified. Those include: matching services with identified needs, developing and implementing appropriate normalcy plans, and addressing physical, mental and developmental health issues.

Since this special QA review focused on statewide performance, results from interviews with local youth have been provided to the individual regional directors and community-base care lead agencies' leadership. Based on review findings, several recommendations were made to help drive program improvements:

1. Develop a tracking mechanism that flags this population; identify youth as soon as they reach their 17th birthday, so all of the important steps toward independence are methodically planned and executed before the youth turns 18 years of age including early identification of youth with disabilities. Planning for youth with disabilities must begin early so that youth are linked with needed services and placements prior to reaching their 18th birthday. FSN should be reviewed to determine if tickler systems can be developed.
2. Address supervisory oversight and consider development of a supervisory checklist to ensure caseworkers conduct required actions within the timeframes established in statute and administrative rule, including activities that demonstrate joint case planning for dually served child welfare/juvenile justice youth. Supervisors must address the quality of casework to ensure youth have individualized independent living plans, meaningful training, etc. In addition, supervisors must ensure reports provide qualitative information.
3. Provide training for youth that represents a more balanced approach, to include not only practical skills, such as budgeting, etc., but also "softer" skills (promoting self esteem and relationship building), both of which are critical for youth to learn. Incorporate an assessment component into youth trainings that requires youth to demonstrate competencies in the skills taught.
4. Finalize core contract outcome measures for CBC contracts to be used by community-based care lead agencies' management and Department leadership.

A summary of the case file data follows each topic area as well as some of the highlights from youth interviews that relate to the same topic.

General Assessment and Skills/Training

Case File Reviews:

Reviewers were asked to determine if timely assessments had been conducted (no later than 30 days after a youth turns 17); if they were of sufficient quality to identify services needed; and if appropriately matched services were provided and documented in the case file. The data clearly indicated that timeliness is an area that needs improvement

because only a little more than one-half of the sample reflected timely assessments had been completed.

Regions and community-based care lead agencies should develop mechanisms to more effectively track foster youth reaching their 17th birthday so that this important assessment can be scheduled very soon thereafter. Although assessments were not always timely, better performance was noted in practices related to providing for service needs identified during the process.

Interviews:

Youth were asked if they believed they had been offered and completed the necessary life skills training to successfully achieve independence. Of the 144 responses to this question, 69% believed that they had; 17% believed they had received some training, but not enough; and, 15% declared they had not been offered or completed adequate life skills training. As far as actually being asked to demonstrate learned life skills, 33% of the respondents said they were always asked to demonstrate a newly learned skill, whereas 35% said this occurred sometimes, and 31% said they had never been asked to demonstrate a life skill.

Staffings and Judicial Reviews

Case File Reviews:

Reviewers were instructed to look for evidence that staffings were being held at least every six months that included addressing education and work goals, progress, obstacles to progress, life skills, Subsidized Independent Living service, Road to Independence, and other mandatory topics. Reviewers found only 57% of the case file reviews documented that timely and qualitative staffings were held. Poor performance was noted in conducting staffings within 30 days of the judicial review. This staffing is intended to inform youth of the options available to them upon reaching their 18th birthday. In addition, significant gaps in performance were noted with holding the required judicial review at the beginning of the six month period before the youth's 18th birthday. Again, the intent is to allow time to carefully and appropriately plan for exiting foster care successfully.

Interviews:

Of the 148 youth responding to the question about participating in the Independent Living staffing or other meetings and being able to provide input, 72% of them said they always were included; 13% said they were sometimes, but 16% said they were never included.

Case Planning and Transitional Services

Case File Reviews:

To achieve the best possible outcomes for youth exiting foster care, the case management network must work very closely with the youth in planning for the future well in advance of the youth reaching 18 years of age. Careful and focused planning will ease transition; the youth will know more about what to expect upon exiting, and optimal planning will help counter any unanticipated barriers that may surface. The review findings around case planning practices indicate a significant performance gap overall.

One of the most pressing issues to date for this population is that in preparing to exit foster care, youth should be able to demonstrate competency in important life skills. Reviewers were asked to assess the individual Independent Living Plans and determine if the tasks had measurable outcomes. In particular, reviewers were required to assess whether the plan required that youth actually demonstrate the skills they had learned through training; such as preparing a budget, cooking a meal, or managing a bank account, all of which are basic survival skills. Less than half of the case file reviews contained documentation that this had occurred.

During transitional planning and especially at 17 and one-half years of age, the youth should be provided any and all available services that are specific to his/her individual needs as identified during a thorough assessment process. Data reflect a significant performance gap in that only 56% of the applicable cases documented this was achieved. Better performance was noted in that 90 days prior to the 18th birthday more attention was being given to informing and assisting the youth to apply for needed services upon exiting foster care. However, with 68% achievement, this is another opportunity for improvement.

Reviewers were asked to look for documentation in the file that supports the youth had either a physical health screening or ongoing routine health care. If any physical health needs were identified, a plan to address those needs should be documented. In 71% of the reviews, physical health needs were documented and addressed.

Interviews:

When 148 youth were asked if their case manager or independent living coordinator actively worked with them to develop a support system, 68% agreed that they had. Youth also responded quite positively when asked if they had someone they could turn to for help when they exit foster care, and 91% said they did. Individuals that the youth identified were usually relatives (including siblings), a mentor, child welfare staff, peers or friends, and the Guardian ad Litem.

In addition, when asked if they had input into developing education plans or a career path, 75.6% of the youth said they had; 9.4% said they had some input, and 14.8% said they had no input.

Eighty-two percent (82%) of the youth interviewed said they had physical health examinations and their needs were addressed. This is a significantly better result than revealed by a review of case file documentation (71%).

Youth Jointly Served by Child Welfare and the Department of Juvenile Justice

Case File Reviews:

Of the 159 youth in the sample, 42 were also being served by the Department of Juvenile Justice (DJJ). Review findings indicate significant opportunities for improvement in working with this population. Record reviews indicated that DCF and DJJ were not working together to ensure dually served youth were engaged in independent living planning. File reviews indicated that for dually served youth, there was evidence of a jointly developed qualitative written plan for independent living services in only 17% of the cases.

Interviews:

Of those youth who were also served by DJJ (47 of the 159), only 4% said their probation officer worked with the case manager to obtain independent living services.

Services to Youth with Disabilities

There are many challenges to addressing the needs of adolescents with disabilities. Because of the complexity of their needs, comprehensive services and supports for these youth are needed. During file reviews, a small number of youth with disabilities were identified. For those youth lacking appropriate services, a Request for Action referral was made. Examples of services or lack thereof are provided below.

- One child was diagnosed with Autism and Moderate Mental Retardation and was not capable of living independently. He was receiving numerous services to address his needs through Agency for Persons with Disabilities (APD), his school, case management, and his Independent Living Coordinator. He is heavily supported by his foster family, and they plan to apply to become his adult caregivers through APD once he turns eighteen.
- One youth had multiple diagnoses, including Asperger's Syndrome, but there was no documentation of planning to address his needs once he is an adult.
- One youth was about to turn 18, but there was no documentation of a plan to address his mental health and physical health needs. He was 60% hearing impaired, but the record documented no periodic audiological assessments.

- One youth resided in a Children's Medical Services medical foster home due to being an insulin-dependent diabetic. No plan for housing was documented for the youth when he turns 18, but the medical foster parent expressed her willingness to allow him to continue residing in her home as long as he attends school.
- Two youth were receiving Supplemental Security Income (SSI) benefits. The case record of one documented the youth was referred to APD and was assigned a case coordinator. The other youth was receiving SSI benefits prior to his commitment to a Department of Juvenile Justice facility, and a Request for Action was generated to complete a referral to APD.
- One youth was severely developmentally delayed and required a permanent supervised living arrangement since she will never be able to live independently. The agency has applied for Medicaid waiver services and there is a high likelihood that she will be reunified with her mother when she turns 18.
- One youth was developmentally delayed and was unable to be interviewed. The foster parent stated that she was very involved in his school and would like to remain as his caregiver since he has resided there for over two years and is very stable in this placement. However, she has not been included in the independent living staffings and has not been able to find out if he can remain with her as she operates a therapeutic foster home.
- One youth was developmentally delayed and resided in a therapeutic foster home. He was in the process of being adopted and was receiving all services through his school and his foster parents. He is currently employed.

Normalcy Activities

Case File Reviews:

The normalcy plans should provide opportunities for the youth to interact with mentors and manage some of their personal matters. The normalcy plan should address issues related to everyday activities such as overnights, dating, employment, and participating in extracurricular events.

Reviewers were asked to determine if appropriate normalcy plans were in place, if they were updated regularly, and actually implemented. Data indicate that practices around planning and implementation are fairly well underway, but these plans do not appear to be updated at least quarterly.

Interviews:

Youth responses differ from case file findings in that only 64.8% of youth interviewed reported having been involved with developing a written normalcy plan, however, many of the youth who were not necessarily involved in writing the plan, reported they do “normal things” like going to the mall, to the movies, church, etc. A few of the youth reported they did not even know what a normalcy or a teen plan was.

Subsidized Independent Living Activities

Case File Reviews:

A formal evaluation to determine readiness for the Subsidized Independent Living Program is required for all 16 and 17 year olds in licensed out-of-home care. Youth must be in licensed care for at least six months and have a goal of adoption or Another Permanent Planned Living Arrangement. In addition, youth must: be employed at least part-time (earning a minimum of \$100 a month); have sufficient savings or other means by which to pay move-in expenses; be enrolled in a full time educational program; have the necessary skills to live independently; and demonstrate responsible behavior.

Review findings indicated that a little more than one-half of the 17 year olds in the sample had been appropriately or thoroughly evaluated for the Subsidized Independent Living Program. Of the 53% who had been appropriately and thoroughly evaluated, 19 met all of the requirements, and 88% (or 17 of the 19 files) reflected an agreement that adequately addressed the youth’s unique skills, needs, and behavior.

Interviews:

Similar to case file review findings, 49.3% of the youth interviewed indicated they had been evaluated for the Subsidized Independent Living Program.

Mental/Behavioral Health

Case File Reviews:

Of the 159 case files reviewed, 50 youth were prescribed psychotropic medications. In these instances, there should be documentation in the case file indicating ongoing communication and coordination between the case manager (who has responsibility to monitor the youth’s medications) and the Independent Living Coordinator. There is a significant gap in performance based on the expectation that any youth on psychotropic medications, especially those being readied for release from licensed out-of-home care, needs additional attention and coordination of services in this area.

Achieving the standard for addressing mental/behavioral health needs at this critical stage is also an area that needs improvement.

Interviews:

Each youth was asked if he/she had had a mental health screening or assessment to identify any potential mental health issues and 64% said they had; 40 youth explained that they were prescribed psychotropic medications (contrary to the 50 identified in the case file reviews) as a result of screenings/assessments, and of those, 33 agreed that they needed the medication. Of those, 20 youth indicated they have discussed medication management with their case manager and/or Independent Living Coordinator as they prepared to exit foster care.

Many of the youth reported they were receiving counseling, living in therapeutic foster care, or had previously been in a residential facility. Others denied having been screened but stated that they had no mental health issues or needs.

To see the Quality Assurance Independent Living Review Phase II: Age 17 Report in its entirety, please visit:

http://centerforchildwelfare.fmhi.usf.edu/qa/ILSpecialReviews/IL_SpecialReviewPhase2Jun-10.pdf.

Phase III of the review has been completed, and is scheduled to be published in spring 2011.

Programmatic Oversight through the Federal Child and Family Services Review Quality Improvement Plan (QIP)

In June 2009, the Department submitted an amended Quality Improvement Plan to the Administration for Children and Families in response to findings from the most recent federal Child and Family Services Review. This plan is being implemented over a two year period. The delivery of independent living services is a key element of this plan.

Of the five goals in the QIP plan, the one most directly applicable to independent living is, "Goal 3 – Improve Service Array." To achieve this goal, the Department developed a strategy to individualize services for family members to meet their specific needs and enable families to nurture their children. All regions, circuits, and community-based care lead agencies identified local tasks to align with this third goal.

In September 2010, the Children's Bureau sent a letter to the Department noting the results of their review of the fourth quarterly report for the Florida Child and Family Services Review Program Improvement Plan. This review indicated that "Florida appears to be on target with the majority of action steps and strategies due for completion during Quarter Four. Action steps within "Goal 3 – Improve Service Array" that have been completed are:

- ✓ Conduct a survey of youth age 13 – 23 relating to transitioning to adulthood, etc.

- ✓ Expand Operation Full Employment for youth in foster care, to support youth in their transition to independence.
- ✓ Develop and distribute guidelines for the application processes for Medicaid, KidCare, Healthy Kids, and related medical / financial / employment services.

Training and technical assistance continues to be provided to Florida by the National Resource Centers for Legal and Judicial Issues, Organizational Improvement, Permanency and Family Connections, Adoptions, and Substance Abuse and Child Welfare.

Fiscal Oversight

Spending Plans

As required by ss. 409.1451(5), F.S., each community-based care lead agency submitted a plan to the Department in September 2010 addressing the following major components for the population of young adults formerly in foster care. These plans contain the following elements:

- The number of young adults to be served each month of the fiscal year;
- The number of young adults who will reach 18 years of age who will be eligible for the plan;
- The number of young adults who will reach 23 years of age and will be ineligible for the plan or who are otherwise ineligible during each month of the fiscal year;
- Staffing requirements and all related costs to administer the services and program;
- Payment to, or expenditures on behalf of, the eligible recipients;
- Costs of services provided to young adults through an approved plan for housing, transportation, and employment; reconciliation of these expenses and any additional related costs with the funds allocated for these services; and
- An explanation of and a plan to resolve any shortages or surpluses in order to end the fiscal year with a balanced budget.

These plans are being reviewed at the state office to address any areas of concern regarding fiscal management of independent living services. The plans serve as a continual tool to help project budget issues and to identify trends and/or concerns

specific to budget management for service delivery to young adults formerly in foster care.

Fiscal Monitoring of the Community-Based Care Lead Agencies

The Department has a Community-Based Care (CBC) Fiscal Oversight Unit that reports to the Assistant Secretary for Administration. This unit focuses on oversight of the fiscal components of the outsourced child welfare system and has conducted site visits to community-based care lead agencies to develop tools for monitoring and providing technical assistance to community-based care lead agencies and the Department's contract managers. This fiscal monitoring model leverages financial information required by contract has been successful in identifying areas of concern before any major findings occur. It has also been well received by the community-based care lead agencies as being very helpful.

For calendar year 2010, the CBC Fiscal Oversight Unit published the following Department of Children and Families Fiscal Monitoring and Technical Assistance of Community-Based Care Child Welfare Lead Agency and Department of Children and Families Financial Risk Assessment of Community-Based Care Lead Agencies:

- Clay/Baker Kids Net (dba Kids First of Florida)
- Eckerd Community Alternatives
- Hillsborough Kids, Inc.
- ChildNet, Inc.
- Lakeview Center (dba First Families Network)
- St. Johns County Board of County Commissioners / Family Integrity Program

Clay/Baker Kids Net (dba Kids First of Florida)

A Department of Children and Families Rapid Financial Risk Assessment was completed in January 2010. This financial review was performed by Department staff from the Office of Financial Management and Office of Contracted Client Services in which one of the purposes of the on-site fiscal monitoring was to conduct a transaction sample to test for allowable, reasonable and necessary expenditures.

From this, all sampled transactions complied with reasonable, allowable and necessary costs and were charged in accordance with the approved cost allocation plan. However, a question did arise regarding whether or not Independent Living costs for 13 – 17 year olds for life skills training can be charged to Out-of-Home / Dependency Case Management. Follow up resulted in a determination that these charges could be charged to Out-of-Home / Dependency Case Management.

The assessment rendered Clay/Baker Kids Net (dba Kids First of Florida) as having a *low* financial risk.

Eckerd Community Alternatives

A Department of Children and Families Fiscal Monitoring and Technical Assistance of Community-Based Care Child Welfare Lead Agency was completed in January 2010. One of the purposes of this fiscal monitoring visit was to review in more detail the community-based care lead agencies' subcontracts for Case Management Organizations (CMO) and Residential Group Care providers (RGC) since they represent the bulk of services to be provided and to verify that the method for reporting costs by cost pool to the Department from subcontracts could be supported.

It was recommended that the fiscal and contract staff supporting Eckerd Community Alternatives become much more familiar with the programmatic activities for Eckerd Community Alternatives' service delivery, one of which is Independent Living services. These staff need to have a good working knowledge of who is delivering the service, what service or activity is being delivered, who is receiving the service and what funding is available to cover the service. Child welfare funding and contractual requirements are extremely complex and require an extensive knowledge in order to be handled successfully.

The CBC Fiscal Oversight Unit must perform a follow up visit.

Hillsborough Kids, Inc.

A Department of Children and Families Fiscal Monitoring and Technical Assistance of Community-Based Care Child Welfare Lead Agency was completed in January 2010. One of the purposes of this fiscal monitoring visit was to review in more detail the community-based care lead agencies' subcontracts for Case Management Organizations (CMO) and Residential Group Care providers (RGC) since they represent the bulk of services to verify that the method for reporting costs by cost pool to the Department from subcontracts could be supported.

It was recommended that Hillsborough Kids, Inc. update all Case Management subcontracts to clearly identify all services to be provided, and to include a narrative to

define how performance incentive payments will be determined and the maximum amount that could be awarded subject to availability of funding.

No follow up visit was necessary; however Hillsborough Kids, Inc. was to make updates to their Cost Allocation Plan as identified in the report and resubmit it for review and approval by the CBC Fiscal Oversight Unit.

ChildNet, Inc.

A Department of Children and Families Rapid Financial Risk Assessment was completed in March 2010. This financial review was performed by Department staff from the Office of Financial Management and Office of Contracted Client Services. One of the purposes of the on-site fiscal monitoring was to conduct a transaction sample to test for allowable, reasonable and necessary expenditures.

From this, it was recommended that the Chief Financial Officer and Director of Finance should attend appropriate Office of Management and Budget (OMB) Circular A-122 (now 2 CFR 225) training in order to provide better assurance that costs are allowable, reasonable, and necessary and to aid in applying the appropriate cost allocation principles.

The assessment rendered ChildNet, Inc. as having a *low* financial risk; however, should items not be corrected in a timely manner, the CBC Fiscal Oversight Unit reserves the right to reassess the level of risk and take appropriate actions.

Lakeview Center (dba First Families Network)

A Department of Children and Families Fiscal Monitoring and Technical Assistance of Community-Based Care Child Welfare Lead Agency was completed in May 2010. One of the purposes of this fiscal monitoring visit was to reassess the amended residential group home contracts for life skills trainings and verify that these costs are now being recorded separately and are charged to the appropriate Independent Living Cost Pool.

It was recommended that Lakeview Center build on the progress that had been made and continue training field staff to provide the necessary information for the correct application of accounting codes for expenditure reporting.

St. Johns County Board of County Commissioners / Family Integrity Program

A Department of Children and Families Rapid Financial Risk Assessment was completed in August 2010. This financial review was performed by Department staff from the Office of Financial Management and Office of Contracted Client Services. One

of the purposes of the on-site fiscal monitoring was to conduct a transaction sample to test for allowable, reasonable and necessary expenditures.

This transaction sample was 100% accurate to cost pools; however, it was recommended that residential group home providers be reclassified as sub recipients instead of vendors, that the agency develop and implement written contracts that specify the responsibilities of the two parties (one of those parties providing Independent Living services) and that the agency ensure that all subcontracts cover the applicable requirements of the Department's master contract with St. Johns County.

C. Rules Promulgation

Provisions relating to the delivery of independent living transitional services are included in multiple chapters, including:

- Chapter 65C-28, Out-of-Home Care, providing direction for delivery of services to youth in foster care. Specifically, 65C-28.009, Adolescent Services, implements s. 409.1451(3), F.S.
- Chapter 65C-30, General Child Welfare Provisions, providing direction on delivery of services to youth under supervision of the Department.
- Chapter 65C-31, Services to Young Adults Formerly in the Custody of the Department, providing direction on the delivery of services to young adults, specifically those provided by s. 409.1451(5), F.S.

During the 2010 legislative session, the Department was given rule making authority to adopt rules to govern the payments and conditions related to payments for services to youth or young adults provided under section 409.1451, F.S.

In May 2010, the Department published a Notice of Rule Development for Chapter 65C-31, Florida Administrative Code. In June 2010 public workshops were conducted in Fort Lauderdale and Orlando. Community-based care lead agencies, contracted services providers, and community stakeholders had the opportunity to provide comments on the modifications needed to the rule that would assist in fiscal savings and accountability for the Independent Living Program. As a result, these comments were incorporated in the proposed revision of the rule, and an emergency rule was filed with an effective date of September 7, 2010.

In October 2010, the Department held a public hearing on the proposed revisions to rule 65C-31, F.A.C. These proposed revisions incorporate provision as per the emergency rule. It is anticipated that this rule will be final in early 2011.

Proposed rule revisions address:

- **65C-31-001- Definitions**

- Technical changes.
- **65C-31.002 - Case Management for Young Adults**
 - Specifies not an entitlement program;
 - Case manager and services worker must coordinate; and
 - Addresses technical issues raised by the Joint Administrative Procedures Committee (JAPC).
- **65C-31.004 – Road to Independence Program**
 - Technical changes to replace “scholarship” with Program to conform to statutes;
 - Deleted the language authorizing the Secretary to waive requirements as the Secretary does not have authority to waive requirements established by Department of Education;
 - Included Agency for Workforce Innovations (AWI) Eligible Training Providers list;
 - Technical changes and clarifies language of the Road To Independence Program; and
 - Clarifies eligibility for Food Stamp Program as requested by ACCESS.
- **65C-31.005 - Transitional Support Services**
 - Technical changes.
- **65C-31.006 - Documentation Requirements**
 - Requires case manager to contact education institution to verify full-time enrollment and attendance for General Educational Development Program; and
 - Removes language requiring the General Education Development exam to be taken twice a year as JAPC maintains Department does not have authority to require the student to take the exam twice a year.
- **65C-31.007 – High School Needs Assessment**
 - Requires Social Security be included in determining needs; and
 - Removes language describing the needs assessment.
- **65C-31.008 – Post Secondary Needs Assessment**
 - Young adults in Department of Juvenile Justice (DJJ) or correctional facilities are not eligible for RTI but may be eligible for Aftercare or Transitional Support Services;
 - Requires Social Security be included in determining needs;
 - Adds a Work Search Record Form, developed by the Department, as requested by JAPC because the current language delegates authority to AWI to establish criteria for the RTI program;

- Requires the Department to informally review changes in stipend amounts and denials prior to taking action;
 - Technical changes in listing required forms; and
 - Changes requested by Attorney General's Office to: change administrative process in handling fair hearings to reflect current practice and provide copy of case record upon request rather than automatically.
- **65C-31.010 – Jurisdictional and Service Requirements**
 - Deletes reference to an obsolete form;
 - Technical changes to replace “scholarship” to Program to conform to statutes; and
 - Deletes attachments included in the rule to incorporate by reference and provides forms section on-line.
 - **65C-31.011 – Budget Management**
 - Requires Department to review and approve community-based care lead agencies' spending plans;
 - Defines availability of funds as unexpended state funds from prior years;
 - Establishes Review Team; and
 - Requires Departmental review twice a year and validate payments, any disallowance must be repaid by the CBC to the Department.