

**GUIDELINES**  
**FOR**  
**THE**  
**INDEPENDENT**  
**LIVING**  
**PROGRAM**

**June 1999**

**STATE OF CALIFORNIA**  
**Gray Davis, Governor**

**HEALTH AND WELFARE AGENCY**  
**Grantland Johnson, Secretary**

**CALIFORNIA DEPARTMENT OF SOCIAL SERVICES**  
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## **I. PREFACE**

These guidelines are intended to provide counties operating Independent Living Programs (ILP) with basic information about the goals of the program, eligibility for the program, program requirements, program limitations, and fiscal reporting. The guidelines incorporate information provided in All-County Letters, All-County Information Notices, letters to county welfare directors and Federal Administration for Children, Youth and Families Program Instructions.

## **LEGAL AUTHORITY FOR THE INDEPENDENT LIVING PROGRAM**

The Independent Living Program (ILP) was initially authorized by Public Law (P.L.) 99-272, through the addition of Section 477 to Title IV-E of the Social Security Act (the Act). Since that time, amendments have been made to Sections 474, 475 and 477 of the Act to increase the amount of funding, to expand the population eligible for services, and to ensure that the ILP is integrated into the requirements of State child welfare services programs.

The Congress has recognized the exceptional needs of youth age 16 through 21 who are or have been in foster care, as they emancipate from the child welfare services system and make the difficult transition to living independently. As a result, the Omnibus Budget Reconciliation Act of 1993 (P.L. 103-66) permanently reauthorized the ILP effective October 1, 1992.

Despite its authorization under Title IV-E , the ILP is not a foster care maintenance program; it provides funds directed towards one goal: assisting youth that are or were in foster care to become self-sufficient adults.

As Congress intended, the California Department of Social Services (CDSS) has implemented the program with minimum requirements and specifications. Counties have the flexibility to design services to meet a wide range of individual needs and circumstances for youth, and to coordinate services with other Federal, State and local agencies engaged in similar activities. The enactment of Senate Bill 933, Chapter 311, Statutes of 1998 amended the Welfare and Institutions Code by requiring the provision of self-sufficiency services to emancipated foster youth to age 21.

Counties are encouraged to review their administration of the program, consider how the ILP can be included as a part of the continuum of child welfare services, and evaluate their ILP policies and procedures.

## **GOAL OF THE INDEPENDENT LIVING PROGRAM**

The California Department of Social Services (CDSS) recognizes the need for independent living skills training for all youth preparing to leave foster care and for the young adults who have emancipated. The goals of the ILP are to enable eligible youth to achieve self-sufficiency prior to leaving the foster care support system and through the continuum of emancipation. Providing independent living skills assessments, basic living education, vocational training, job seeking skills, individualized services, and a written Transitional Independent Living Plan for each participating youth assists in achieving the goal.

It is a top priority of the CDSS to make the Independent Living Program available and accessible to all eligible youth in California.

## **II. ELIGIBILITY FOR INDEPENDENT LIVING PROGRAM SERVICES**

Definition of Eligible Participants: Persons eligible for services are: 1) all youth age 16 and over for whom foster care maintenance payments are being made under title IV-E; 2) any other youth age 16 and over who are in foster care (non-IV-E eligible) under the responsibility of the State; (including but not limited to non-IV-E eligible youth residing in kinship care who are in receipt of family reunification and/or permanent placement services); and, 3) all former foster care youth who were in foster care after the age of 16. Youth are eligible for ILP services up to age 21.

The phrase “in foster care” is defined as any child on whose behalf a State or Federal Aid to Families with Dependent Children-Foster Care (AFDC-FC) payment is being made and/or who is receiving Family Reunification or Permanent Placement services.

Wards of guardians and probation youth age 16 and older who are in foster care are eligible for ILP services on whose behalf a State or Federal AFDC-FC payment is being made and/or who is receiving Family Reunification or Permanent Placement services.

### **A. AGE REQUIREMENTS**

Independent Living Program services are available to youths in foster care aged 16 through 18, who prior to reaching age 18 are full-time students in a secondary school or an equivalent vocational-technical training program and are expected to complete the program before reaching age 19. Emancipation services are available to former foster youth that were otherwise eligible while in care after the age of 16.

### **B. FOLLOW-UP SERVICES**

Independent Living Program services are available to any youth who was in foster care but discontinued receiving foster care services or payments on or after the date the youth became 16. Independent living services and programs for this population are called “follow-up” services.

Follow-up services are available to youth that leave foster care to live independently. Follow-up services are also available to youth that are no longer in foster care because they have been reunited with their families

and are receiving Family Maintenance program services and to youth whose court-ordered dependency has been terminated and the CWS case has been closed.

### **C. EMANCIPATION SERVICES**

Services for the purpose of a developmental continuum through emancipation are also available. Emancipation services can be continued until the young adult has reached the age of 21.

## **III. DESCRIPTION OF SERVICES**

In addition to Federal Independent Living program specifications, the California Department of Social Services' Manual of Policies and Procedures (MPP Division 31-525.1 requires: "For each child in placement, age 16 or older, the social worker shall develop a written Transitional Independent Living Plan which describes the programs and services, including employment, as appropriate, which will help the youth prepare for the transition from foster care to independent living."

### **A. PROGRAM AND ACTIVITIES**

In accordance with Federal ILP specifications, expenditures must be related to the specific purposes of the ILP. As stated in Section 477(d) of the Act, such purposes may include programs to:

1. enable participants to seek a high school diploma or its equivalent or to take part in appropriate vocational training;
2. provide training in daily living skills, budgeting, locating and maintaining housing, and career planning;
3. provide for individual and group counseling;
4. integrate and coordinate services otherwise available to participants;
5. provide for the establishment of outreach programs designed to attract individuals eligible to participate in the program;
6. develop a written Transitional Independent Living Plan with each participant based on an assessment of his or her needs and which will be incorporated into his or her case plan as described in

Section 475(1); and

7. provide participants with other services and assistance designed to improve their transition to independent living.

In accordance with Federal Independent Living Program specifications, activities under the ILP may include, but are not limited to, the following:

1. counseling and other similar assistance related to educational and vocational training; preparation for a General Equivalency Diploma (GED); preparation for higher education, academic support and job placement programs;
2. counseling and instruction in basic living skills such as money management, home management, consumer skills, parenting, health care, access to community resources, transportation, housing options and location;
3. individual and group counseling; participation by the youth, staff and foster parents in workshops, retreats, seminars and conferences; and interpersonal and social skills training and development;
4. coordination with other components of the State's ILP such as transitional living; establishment of linkages with Federal, State and local agencies and organizations such as the Department of Education, special and vocational education programs and local agencies, State colleges, and Department of Labor Employment and training Administration programs; volunteer programs; medical and dental public and private providers; State and community mental health agencies and organizations; and local housing advisors;
5. establishment of an outreach system which would encourage youth in foster care and youth formerly in foster care to participate in ILP's, as well as the development of community organizational efforts and ongoing support networks;
6. involvement of biological parents and, if appropriate, relatives, mentors and foster parents in the development of the youth's independent living skills;
7. services to administer trust funds and/or provide stipends or payments to youth for participation in ILP; and

8. sponsorship of conferences and/or mentoring efforts and/or development of fosters youth membership groups.

## **IV. INCOME AND RESOURCE LIMITS**

Payments made and services provided to youth as part of an independent living case plan are not considered as income or resources for determining eligibility for foster care. For example, incentive payments provided as part of the Independent Living Program are not considered when determining eligibility for AFDC-FC.

Income or property received by a youth that is not a direct result of participation in the ILP and documented in the case plan is subject to the current income test and property limit. Income and property of non-ILP participants remain subject to the current income test and property limit.

### **A. ALLOWABLE AND NONALLOWABLE COSTS**

The December 10, 1993 Program Instruction from the U.S. Department of Health and Human Services, Administration for Children, Youth and Families states that "Expenditures *must* be related to the specific purposes of the Independent Living Program."

#### Nonallowable Costs

Title Iv-E ILP funds may not be used for the provision of room or board (Section 477 (e)(3)). Trust payments may not be used at any time for room or board. Safeguards should be established to ensure that trust funds would not be used at a later time for room or board.

## **V. WRITTEN TRANSITIONAL LIVING PLAN**

Subsequent to the completion of the needs assessment, each youth participating in the Independent Living Program shall assist in the preparation of the written transitional independent living plan based on the assessment of his or her needs. The transitional independent living plan shall also be incorporated into the individual's Child Welfare Services case plan.

Each participant's background, strengths and weaknesses in the following areas should be documented. This information will be used to assess the participant's needs for specific ILP services and training.

- Education
  - Current level (grade) of education
  - Education goals/expectations/plans
  - Chances for completion of high school and/or seeking higher education
  - Specific education problems experienced
- Vocational or other training
  - Field of training
  - Certificate received
  - Interest in pursuing
- Employment experience/training
  - Jobs held/currently holding
  - Career interests
  - Specific employment problems experienced
- Financial/Budgeting
  - Current source(s) of income
  - Amount of experience budgeting
  - Specific problems encountered
- Participant's experience living independently

Training and service objectives designed to lead to each youth's long-term goals shall be included in the written transitional independent living plan. Full-time or part-time employment objectives as appropriate must be specifically identified in the youth's written transitional independent living plan. Each youth participating in ILP shall be given a copy of his/her written transitional independent living plan.

## **VI. CLAIMING INFORMATION**

The following information is provided to clarify claiming instructions previously outlined in All County letter (ACL) 89-05 and ACL 88-92. Reimbursement for the cost of ILP activities is based upon allowable expenditures and is claimed through the quarterly Administrative Expense Claim.

The activities performed for the Independent Living Program have been separated into Case management activity costs and Service activity costs for claiming purposes.

## **VII. INDEPENDENT LIVING PROGRAM-CASE MANAGEMENT**

These activities benefit or support the provision of independent living training and services to all youth.

Time spent by CWD caseworkers performing these activities is to be identified on the Social Services time Study (DFA 46), line AA-ILP-Case Management. The salaries, benefits and allocable support costs associated with these hours are to be reported as an "ILP-Case Management" cost throughout the Administrative Expense Claim.

## **VIII. INDEPENDENT LIVING PROGRAM SERVICES**

These activities directly benefit the youth. They do not need to be case specific.

Time spent performing services activities is to be recorded by CWD caseworkers on the Social Services Time Study (DFA 46), line BB, ILP services.

## **IX. CLERICAL AND ADMINISTRATIVE SUPPORT STAFF TIME**

Time spent by clerical and administrative support staff performing ILP administrative activity, such as contract negotiation, is to be identified on the clerical and administrative Support Staff Time Report (DFA 7) in accordance with each county's approved Annual Time Reporting Plan (ATRP). Time spent by non-casework staff providing transportation services is to be reported in the Direct Services Delivery area of the DFA 7 to ILP-Services. If direct service delivery is not performed full-time, the balance of the time is to be reported on the DFA 7 to the level designed in the ATRP.

In the non-ATRP counties, clerical and administrative support staff time is to be treated as generic for claiming purposes. Time spent by this staff providing transportation services should be reported in the Direct Service Deliver area of the DFA 7 identified to ILP Services.

While a comprehensive list of Case Management and Direct Services costs cannot be compiled, a few examples of the types of activities to be charged to each category as follows:

Service Costs:

- Incentives for ILP youth
- Counseling related to ILP goals
- Referrals to employment and training slots
- Referring participants to job interviews
- Arranging job fairs, workshops, conferences, career days, graduation ceremonies and retreats
- Payments made to an employer/trainer for on-the-job training
- Work-related uniforms, transportation, tools, supplies, etc.
- Payment for scholarship/trust funds
- Travel and per diem costs for foster parents, ILP youth and staff who attend ILP training seminars, workshops and/or conferences.

**A. CASE MANAGEMENT COSTS**

The Child Welfare Services case plan for each youth in foster care age 16 or over, shall include a written description of the programs and services which will help the youth prepare for transition from foster care to independent living.

The case plan for each youth in placement age 16 and older who was offered ILP services and/or participated in ILP should also include a copy

of the needs assessment.

The case plan for each youth in placement age 16 and older must include a copy of the youth's written transitional independent living plan. This plan shall be based on an assessment of the individual youth's needs and shall be incorporated into his/her Child Welfare Services case plan.

## **X. PROGRAM REPORTING REQUIREMENTS**

It is important that accurate records be maintained at the local level. These are necessary for:

- completing required annual ILP reports to the Federal Government
- providing records for State and Federal auditors
- providing information to the Legislature, the California Department of Social Services, and county program managers as a basis for further planning to meet the needs of foster youth
- providing information to the community regarding the benefits of the program

The agency should retain its files as a primary source document for county purposes and one copy of the needs assessment for each youth receiving services during the program year.

Federal Title IV-E ILP grant program instructions specify very detailed evaluation reporting criteria. Individual client information is to be kept for each youth participating in the ILP, which includes client characteristics, demographics, service description and outcome information.

Program reports are due to CDSS as specified. In order to capture a more complete picture of county services, the CDSS may request both narrative and demographic data.

### **A. ILP PLANS**

An ILP plan and any revisions, additions to the county's original ILP plan

must be submitted by each county to the CDSS-Foster Care Services Bureau. The Independent Living Program plan must address the delivery of services listed under the Program and Activities (Page 2) and any other services provided by the county. Each program element to be provided should be addressed in the program plan as direct services, contracted services, or referral to existing community resources.

## **B. COMPETITIVE BIDDING**

Manual of Policies and Procedures (MPP) Section 23-600 regulates purchases of service by county welfare departments involving funds administered by the CDSS. In addition, All County Letter 85-72 outlines State policy regarding county contracting for social, professional, and management services.

## **XI. STATE CONTACTS**

Question regarding Independent Living Program should be directed to the Foster Care Services Bureau at:

Maureen Geiger, Transitional Housing Coordinator (916) 324-8256

Sue Hance, Independent Living Program Policy Consultant (916) 323-9290

Lupe Humphrey, Independent Living Program Coordinator (916) 323-6214

Questions regarding the Independent Living Program Time Study and fiscal claiming instructions should be directed to the Fiscal Policy Bureau at (916) 657-3440.

Questions regarding allocations and/or the allocation methodology should be directed to the Contracts and Financial Analysis Bureau at (916) 657-3806.

Questions regarding county contracts for services should be directed to the Contracts and Financial Analysis Bureau, Contracts Section at (916) 657-1889.