

Department of Health and Human Services

**OFFICE OF  
INSPECTOR GENERAL**

**Independent Living Programs  
for Foster Care Youths**

**Strategies for Improved  
ACF Management and Reporting**



**JUNE GIBBS BROWN  
Inspector General**

November 1994  
#OEI-01-93-00090

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The report was prepared under the direction of Mark R. Yessian, Ph.D., the Regional Inspector General, and Martha B. Kvaal, Deputy Regional Inspector General, Boston Region, Office of Evaluation and Inspections. Participating in this project were the following people:

#### **Boston Region**

Timothy Corbett  
David Veroff

#### **Headquarters**

Ann O'Connor, *Program Specialist*

*For additional copies of this report, please contact the Boston regional office by telephone at (617) 565-1050, or by fax at (617) 565-3751.*

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# EXECUTIVE SUMMARY

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## PURPOSE

To assist the Administration for Children and Families in its efforts to improve its management and program reporting strategies for the Title IV-E Independent Living Program for foster care youths.

## BACKGROUND

*Program goals:* Through the Title IV-E Independent Living Program (ILP), the Department's Administration for Children and Families (ACF) supports State efforts to assist adolescents in foster care--and adolescents who were previously in foster care after age 16--to prepare for independent adult life. Such efforts are intended to enable youths to find housing and employment, achieve positive social relationships, perform daily living activities, and live independently of public support. Federal instructions to the States note that they "may use varying methods and strategies to achieve the program objectives," though program funds may not be used for room and board, and must supplement, rather than replace, existing expenditures.

*This report:* The program received permanent reauthorization in August 1993, at \$70 million per year. The ACF has taken this occasion as an opportunity to reexamine its approach to the program, and has asked the OIG to provide information and ideas on improved long-term management and program reporting strategies. We have drawn upon several primary sources of information, including a record review, structured on-site and telephone discussions with State and ACF staff, and a focus group with members of the National Independent Living Association.

## ACF AND THE FUTURE OF INDEPENDENT LIVING

The ACF recognizes that it must address a number of issues as it considers how it can best fulfill its management and oversight responsibilities. These include questions about the agency's general role in independent living, the integration of independent living into the spectrum of child welfare services, and the Federal government's overall approach to the needs of youths.

## RECOMMENDED STRATEGIES

We recommend two broad strategies that ACF should undertake in order to better ensure accountability, promote quality State services, and enhance understanding in the field of independent living. The ACF's decisions regarding its overall approach to independent living, as outlined above, will help direct its choice of specific options in each area.

## **THE ACF SHOULD RESTRUCTURE ITS INDEPENDENT LIVING PROGRAM APPLICATION AND PROGRAM REPORTING PROCEDURES.**

### **Issues of Concern:**

The ACF's current application and program reporting mechanisms do not adequately support State planning and do not allow ACF to gain an accurate national picture of independent living efforts. The lack of such information weakens basic accountability and hinders efforts to improve programs and to determine effective practices.

- The current application process discourages effective planning and full integration with other child welfare services.
- Program reporting by the States has been inconsistent.
- The application and program reports have not focused adequately on program performance and outcomes.

### **Options for Improvement:**

#### **Require and support better State planning:**

- Create a consolidated State plan for child welfare services that includes independent living, and set minimum requirements to ensure that relevant issues are adequately addressed.
- Require States to establish measurable goals and targets, and to report on their progress.
- Adjust the timing of the State plan and the grant award to ensure that funds are made available by the beginning of the fiscal year.

#### **Strengthen independent living reporting mechanisms:**

- Retain a distinct focus on independent living and youths in any State child welfare reporting system.
- Use a simple, standard reporting form for aggregate information in order to improve the reliability of data, while minimizing the burden on the States.
- Utilize the capabilities of State Automated Child Welfare Information Systems and the Adoption and Foster Care Analysis and Reporting System.
- Encourage electronic reporting specifically for independent living.

**Improve the content of independent living reporting:**

- Establish a basic data set for independent living, including basic demographic, service, and outcomes information.
- Facilitate the development of clear definitions of independent living terms.
- Collect more detailed budget data through the program reporting mechanism.
- Solicit information on effective practices and innovations.

**Focus on program performance and outcomes:**

- Develop performance and outcomes measures for independent living.
- Establish general parameters within which States could define specific outcomes and ways of measuring those outcomes.
- Focus on the status of youths at discharge.
- Encourage and assist State efforts to link independent living data systems with public assistance, unemployment, criminal justice and Internal Revenue Service information systems.
- Play an active role in independent living research.

**THE ACF SHOULD FOCUS ITS MANAGEMENT AND PROGRAM REPORTING EFFORTS ON INFORMATION SHARING.**

**Issues of Concern:**

The ACF has not actively facilitated information sharing among States, components of ACF, and other Federal agencies. This lack of good communication may be limiting opportunities for States to improve the quality of independent living services and for ACF to provide effective advice to States and others on the program.

- The ACF has not generally made available to States information it currently collects and to which it has access.
- The ACF's interactions with States about the program, aside from the reports and applications, have been limited.
- State and ACF officials see substantial room for improvement, and view more complete and accurate information sharing as key to such progress.

### **Options for Improvement:**

The ACF could capitalize on its investment in independent living by effectively gathering, analyzing, and sharing among the States information on the program's successes and difficulties. Below, we identify several specific options that ACF could consider. Some of these could be undertaken immediately with no extra financial commitment, while others might require additional funding. To finance such activities in a tight budgetary environment, ACF could seek legislation to provide a set-aside from the Federal independent living appropriation for these purposes.

#### **Provide written information to the States:**

- Report on State performance measures.
- Disseminate qualitative updates on State activities.
- Share model forms and directories of available resources.

#### **Facilitate information sharing through ACF staff:**

- Develop a focus for ACF youth programs in central and each regional office.
- Incorporate independent living issues into other child welfare monitoring activities.
- Become a resource on other Federal programs serving youths, and facilitate coordination among these and the Independent Living Program.

### **COMMENTS ON THE DRAFT REPORT**

We shared our draft report with and solicited comments from the Administration for Children and Families (ACF), the Assistant Secretary for Planning and Evaluation, the Assistant Secretary for Management and Budget, and the Assistant Secretary for Legislation. We also solicited comments from the Child Welfare League of America (CWLA) and the National Independent Living Association (NILA).

We received written comments from ACF and from CWLA and NILA. They all concurred with our two recommendations. The CWLA and NILA also commented favorably on several options we offered for each recommendation.

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# INTRODUCTION

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## PURPOSE

To assist the Administration for Children and Families in its efforts to improve its management and program reporting strategies for the Title IV-E Independent Living Program for foster care youths.

## BACKGROUND

Through the Title IV-E Independent Living Program (ILP), the Department's Administration for Children and Families (ACF) supports State efforts to assist adolescents in foster care--and adolescents who were previously in foster care after age 16--to prepare for independent adult life. Such efforts comprise "a series of developmental activities that provide opportunities for young people to gain the skills required to live healthy, productive, and responsible lives as self-sufficient adults."<sup>1</sup> They are intended to enable youths to find housing and employment, achieve positive social relationships, perform daily living activities, and live independently of public support.

*Adolescents in the Child Welfare System:* The child welfare system has traditionally focused on the security and dependency needs of young children, and on permanency planning efforts that include family reunification and adoption. In recent years, recognition has grown of the need for specialized efforts to serve older children, for whom family reunification or adoption may not be feasible options. Many of these adolescents will eventually "age out" of the substitute care system, usually at age 18, and will face the need to live on their own. This transition to independent living can be difficult for any young adult, but for foster care youths it can pose particularly formidable challenges. Many of these teenagers start out with distinct disadvantages, including limited social support systems, unstable placements while in care, incomplete high school education, limited employment experience, emotional disturbance, pregnancy and parenthood, drug abuse, and health problems.<sup>2</sup>

*The Federal Independent Living Program:* Congress created the Title IV-E Independent Living Program in 1985.<sup>3</sup> Among the allowable services outlined in the legislation are programs to enable teens to seek a high school diploma, its equivalent, or vocational training; provide training in daily living skills, including budgeting, housing, career planning, and health care; provide individual or group counseling; integrate and coordinate existing services; establish outreach programs; provide a written transitional independent living plan to each participant, based on a needs assessment; and provide other services. Federal instructions to the States note that they "may use varying methods and strategies to achieve the program objectives," though program funds may not be used for room and board, and must supplement, rather than replace, existing expenditures.<sup>4</sup> (See appendix A for the legislative history of the program.)

The program received permanent reauthorization in August 1993, at \$70 million per year. Prior to that time, there was considerable uncertainty in the child welfare community as to the program's prospects. Being unsure of continued Federal support, some States made only tentative commitments to independent living. The ACF, likewise, refrained from promulgating regulations or devoting substantial time or resources to the development of oversight or technical assistance efforts for the program.<sup>5</sup>

***Application and program reporting procedures:*** To receive Independent Living Program funds, each State must submit an application, which is due by February 1st (i.e., during the second quarter of the fiscal year for which funding is being requested). Required information includes a description of the services and activities the State plans to carry out, how the State will build on previous years' activities, the number of eligible youths and the number expected to participate, and a description of the State's current efforts. Each State must also submit a year-end program report describing the previous year's activities; this report is due by January 1st. States are required to provide a description of services and activities actually provided, a record of how funds were spent, and information on the demographics and the outcomes of participating youths. Periodic fiscal reports are also required.<sup>6</sup> Beginning in fiscal year 1994, the applications have been reviewed and approved by ACF's regional offices.

***Current ACF initiatives:*** The ACF is currently engaged in a reengineering process designed to improve its ability to support State child welfare programs. These efforts include examinations of ACF monitoring, grants management,<sup>7</sup> and performance measurement. An agency team has been charged to make recommendations that ACF can use "in designing a new approach to monitoring that is cost effective and comprehensive enough to address ongoing stewardship responsibilities."<sup>8</sup> The ACF has indicated an interest in moving from compliance monitoring to greater information sharing. In designing this new approach, ACF will build on recommendations made in a recent Office of Inspector General report, "Oversight of State Child Welfare Programs" (OEI-01-92-00770). That report recommended, among other things, that ACF improve current planning and review processes, focus on outcomes and performance measures, and enhance information sharing.<sup>9</sup>

## METHODOLOGY

We have drawn upon 5 primary sources of information: (1) a review of program reports for fiscal years (FY) 1992 and '93, and applications for FY's 1993 and '94, from all 50 States and the District of Columbia; and a sample of State FY '93 fiscal reports; (2) structured telephone discussions with independent living coordinators in 10 States; (3) structured discussions with ACF staff in central office and each regional office; (4) an in-depth site visit to 1 State to meet with the independent living coordinator, technical assistance and evaluation staff, county-level staff, and staff at a private youth-serving agency; and (5) a focus group and discussions with State coordinators and other professionals at the annual conference of the National Independent Living Association (NILA) in March 1994. In addition, we conducted

informal visits to two State programs; attended a meeting of the independent living coordinators in Region I; held discussions with consultants, academics, and advocates in the field; reviewed legislation and literature on independent living; and examined ACF program information and directions. We also spoke informally with participating youths from Maine, Pennsylvania, Louisiana, and Arizona. (See appendix B for a more detailed description of our methodology.)

We conducted this inspection in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

## **STRUCTURE OF THIS REPORT**

The ACF has asked the OIG to provide information and ideas on improved long-term management and program reporting strategies. Because ACF is aware of the general limitations in its management of the program to date, we do not outline these in a separate section.<sup>10</sup> Instead, we begin with a discussion of several underlying considerations that will affect ACF's overall approach to independent living. We then recommend two broad strategies that ACF should undertake to better promote and support State independent living services. Under each, we describe some of the issues of concern these address, and then identify a series of specific options for implementation. This report does not evaluate individual State efforts or specific program models.

## ACF AND THE FUTURE OF INDEPENDENT LIVING

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The recent permanent reauthorization of the Independent Living Program has prompted ACF to reexamine its approach to the program. The agency wishes to determine how it might, within anticipated resource constraints, better manage Federal independent living resources and guide and oversee State programs. It would like to determine, in particular, how best to prevent inappropriate or ineffective uses of independent living funds, while at the same time allowing flexibility and promoting innovation among the States. The ACF recognizes that it must address a number of issues as it considers how best to fulfill these dual responsibilities, including questions in three basic areas:

- **The ACF's general role in independent living:** How extensive a role does the agency wish to play in independent living? How directive does it want to be? How will ACF's role in independent living be affected by the agency's broader reengineering efforts, particularly with respect to monitoring and oversight?

The legislation gives States great flexibility in spending independent living funds; ACF has left program planning and design largely to the discretion of the States. Most observers consider the program's flexibility--the ability to innovate and to creatively address the diverse needs of this population--to be a significant strength; it is our understanding that ACF does not intend to limit this flexibility in program approach. At the same time, ACF has indicated that it intends to improve its management of the program and to collect better information from the States. The agency is also exploring new approaches to program monitoring that will allow it to play a more consultative and proactive role. The ACF must decide how both to ensure accountability and to guide States within these varied objectives.

- **Integration of independent living into the spectrum of child welfare services:** How will independent living be further integrated into the overall child welfare system? What implications will this have for ACF's role in independent living? What implications will this have for program design, planning, and data collection?

Those in the field widely agree on the desirability of integrating independent living efforts and philosophy into the overall continuum of child welfare services. At the same time, many argue that a continued programmatic emphasis on adolescents is necessary in order to ensure that their special needs are met. In times of limited resources and demanding case loads, it is argued, the needs of teens can too easily be sacrificed to the seemingly more immediate crises of small children suffering abuse or neglect.

The ACF also has a basic responsibility to ensure that the funds directed by Congress toward the needs of adolescents in substitute care are in fact spent on this population. The ACF will have to consider ways of resolving these tensions; it will have to assist States in integrating independent living, without losing sight of it.

- **An overall approach to the needs of youths:** How will independent living fit into the Federal Government's overall approach to the needs of youths? How might collaboration and coordination be improved?

The ACF and other Federal agencies currently fund a variety of programs for youths. Programs administered by ACF include the Jobs Opportunities and Basic Skills program, services to runaway and homeless youths,<sup>11</sup> and a variety of State efforts funded through general child welfare and social services funding mechanisms. The Department of Housing and Urban Development funds transitional housing programs. The Department of Labor coordinates various employment and training programs, including Jobs Training Partnership Act services. The Department of Justice oversees a range of juvenile justice programs. The Department of Education plays a key role in educational programs.

Coordination and collaboration among these efforts, however, is often hindered by poor communication, fragmented funding streams, and divided organizational responsibilities. Broader approaches to integrating and coordinating these programs and funding streams are desirable, and will inevitably have major implications for the types of program reporting structures ACF will use for the program.

## RECOMMENDED STRATEGIES

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In this section, we recommend two broad strategies that ACF should undertake in order to better ensure accountability, promote quality State services, and enhance understanding in the field of independent living. We describe briefly the issues of concern addressed by each strategy and then identify a series of specific options for implementation. Some of these options are mutually exclusive; others fit well together. Our goal is to present ACF with a wide range of ideas on how its management and program reporting procedures could be improved. The ACF's decisions regarding its overall approach to independent living, as outlined in the preceding section, will help direct its choice of specific options in each area.

We also intend that these approaches should benefit the States--by helping them to plan, to understand their own programs, and to learn from their peers. A number of the options we suggest could actually make the States' job easier by enhancing the clarity, efficiency, and value of their reporting efforts. We identify some of the costs as well as the advantages of the various options. On balance, however, we believe that improved management and program reporting will benefit ACF, the States, and the youths whom the program seeks to serve.

### **THE ACF SHOULD RESTRUCTURE ITS INDEPENDENT LIVING PROGRAM APPLICATION AND PROGRAM REPORTING PROCEDURES.**

#### **ISSUES OF CONCERN:**

*The ACF's current application and program reporting mechanisms do not adequately support State planning and do not allow ACF to gain an accurate national picture of independent living efforts. No other source can provide a comprehensive picture of State activities. The lack of such information weakens basic accountability and hinders efforts to improve programs and to determine effective practices. The ACF is also missing an opportunity to guide and encourage high quality State program planning and development.*

**The current application process discourages effective planning and full integration with other child welfare services.**

The separation between the Title IV-B joint plan for child welfare services and the application for independent living funds has led some States to compartmentalize their planning for their youth population.<sup>12</sup> For example, one regional staffer noted that in one State, the independent living coordinator was not even invited to joint planning sessions. Another State coordinator described her contribution to the State joint plan as an "add-on"; her agency did not address the needs of youths in an integrated fashion in the plan.

In addition, the timing of the application and grant award can be an obstacle to good program planning.<sup>13</sup> In the most recent grant period, instructions on the application process were provided more than two months into the fiscal year, and only six weeks before the due date. The award itself has not been made until the middle of each fiscal year; many States have been spending their grants in the second year of the two-year expenditure period. Many States noted that they are not able to commit resources until they actually have the Federal funds in hand. The late grant award can pose particular problems in States that have county-based programs or that rely heavily on contractors; these States need time to negotiate contracts, process applications from counties, or channel funds to providers. The ACF staff have recognized the liabilities of the separate application process and the problems posed by the late awarding of funds.

#### **Program reporting by the States has been inconsistent.**

The States' approaches to program reporting and the quality of their program reports vary greatly. Many reports provide little sense of the intensity of services, and do not explain the range of efforts made for youths in various placement settings. In most cases, there is no clear link between the application and the report; one cannot see if States have done what they planned to do. It is difficult to compare State-by-State information or to construct a comprehensive national picture.

States use various definitions of terms, which can result in duplicate counts and inconsistent statistics. For example, the basic term 'to be served' has different meanings in different States. In some, a youth is counted as 'served' if he or she has a case plan goal of independent living or has received an assessment, while in others, a youth must be enrolled in a formal life skills course to be counted. The term 'appropriate' is likewise used in very different ways; some States consider all youths in the eligible age group to be 'appropriate' for services, while others interpret the 'appropriate' criterion very narrowly. Another example is the term 'counseling'; in some States, this refers only to the services of a licensed therapist, while in others the definition is much broader.

A number of State independent living coordinators and regional ACF officials with whom we spoke expressed the concern that ACF had not clearly articulated its expectations of the States. Their criticisms focus on inadequately precise requirements, unclear definitions of terms, and some conflicting messages from ACF's central and regional offices. Some reports have been incomplete because States had not known in advance that they would be expected to report certain information.<sup>14</sup>

One reason for this is the fact that ACF's instructions on program reporting are purposefully broad; no specific program report format is required or recommended. One State coordinator pointed out that "it's really hard to make comparisons between States when they are interpreting the program instructions very broadly and very individually." In particular, ACF does not require a specific budget breakdown.<sup>15</sup>

Another reason for this variation in reporting is the fact that State methods of data collection and analysis--and the strength of their central, State-wide information capabilities--vary greatly.<sup>16</sup>

**The application and program reports have not focused adequately on program performance and outcomes.**

Most State applications and reports have presented descriptions of activities planned or undertaken; little information has been provided on the quality or impact of such efforts. States are not required to establish goals or targets in their applications, and must provide only very limited outcomes information in their year-end program reports.

The ACF has required States to report on the results achieved by participants 90 days after they receive services. This information, however, has been very difficult to collect, inconsistently reported, and hard to interpret.<sup>17</sup> Most significantly, many States question the value of such information at 90 days after participation--it may be soon enough to reach a considerable number of youths, but too soon to really judge how well the youths are managing their independence. Many States expressed concern that the information does not provide valuable insight into the impact of their programs--and, for this reason, do not see the information as helpful in program development and management. As one State coordinator expressed it, "to think that there is something magical about that 90 days after service is not really true; it doesn't tell us anything meaningful."

#### **OPTIONS FOR IMPROVEMENT:**

##### **Require and support better State planning:**

- *Create a consolidated State plan for child welfare services that includes independent living.*

The ACF has undertaken an effort to combine the plans for Title IV-B Subpart 1 child welfare services, Subpart 2 family support and preservation services, and Title IV-E independent living. Most State coordinators and regional ACF staff with whom we spoke were very supportive of this idea.

A move to a single, multi-year plan could encourage States to integrate independent living more comprehensively into the spectrum of services for children and youths in substitute care. Implemented properly, it could give greater prominence and credibility to independent living as an approach to youths and give independent living staff greater leverage in their overall systems. It could also improve communication within State child welfare agencies. As part of a consolidated plan, independent living would be included formally in the State-ACF joint planning process, which could



create a regular opportunity for direct State-ACF interaction on independent living. It could move ACF and the States towards a greater partnership in independent living.

The potential drawbacks to a single plan might include vagueness or superficiality on independent living issues. One State coordinator expressed the concern that the independent living section of the plan might be completed by someone who is not very familiar with the program. Another was concerned that it could be included as an add-on to the overall plan, without being comprehensively addressed throughout.<sup>18</sup>

To avoid these pitfalls, ACF could set some minimum requirements for the plan to ensure that independent living is adequately addressed. For example, one of the required goals could be related to the preparation of youths for life after discharge. To support an integrated approach, ACF could also encourage or require that youth concerns be addressed, as relevant, throughout the plans. For example, goals and objectives regarding training for staff or foster parents could include elements related to training in independent living philosophy and services.

To maximize the benefits of a single State planning process, ACF could eliminate the separate Independent Living Program application.<sup>19</sup> If ACF does not eliminate the separate application, then it could create a simple, standard application form to ensure the comparability of information among States.

- *Require States to establish measurable goals and targets, and to report on their progress.*

The ACF could require States to use the child welfare services plan (or the independent living application, if it is retained) to lay out specific goals for developing a continuum of services to help youths prepare for independence. Year-end reporting mechanisms could be used to relate States' progress towards these goals.<sup>20</sup> This approach might encourage States to think strategically, while at the same time making their reports more meaningful to ACF.

The most significant potential liability of this approach is the danger that States could set minimal goals for themselves. One State coordinator feared that his own department, which is only minimally committed to independent living, could take the opportunity to decrease its efforts in the area. If goals were set too broadly, accountability could be lost.

To guard against this concern, ACF could specify certain minimum goal areas that States should address. These might include the availability of services in various placement settings (e.g., foster family homes, group homes, residential facilities, and subsidized living arrangements), mentoring opportunities, aftercare services, training for staff and caregivers, educational assistance, job experience, job training, and life skills training. Specific, measurable objectives might include things such as increasing the percent of youths receiving assessments by a certain age, graduating from high

school before discharge, or gaining job experience before discharge; or increasing the percent of staff or foster parents receiving training in independent living. These goals and objectives could incorporate agreed-upon performance measures (we discuss the development of such measures in a later section).

- *Adjust the timing of the State plan and the grant award.*

Regardless of any changes in the application and reporting framework, ACF could take steps to ensure that the grant award is made available by the beginning of the fiscal year. We understand that ACF intends to seek legislation moving the application due date up to June, which would enable it to disburse grants by October 1.

Both earlier knowledge of the grant requirements and more timely awarding of funds could allow States to plan better for the upcoming year. This could be particularly important in States that disperse funds to local or county agencies or that must negotiate contracts with private providers.

There might be two potential drawbacks. First, some States may now be spending money with the expectation that new funds will not be available until late in the fiscal year; a phase-in period could help them to adjust their spending patterns. Second, some State coordinators use their completed program report as the basis for their planning efforts and application. The ACF could allow States to use information from the previous program year as the basis for the application.

#### **Strengthen independent living reporting mechanisms:**

- *Retain a distinct focus on independent living and youths in any State child welfare reporting system.*

The ACF is currently engaged in an agency-wide effort to reduce the reporting burden on States, and to improve the value and use of required reports. As part of this effort, ACF will consider whether to retain or eliminate the separate year-end independent living program report. In either case, ACF could continue to require a specific focus on independent living, both in individual-level records and program-wide reports.<sup>21</sup>

A distinct focus on independent living issues would address three key needs. First, the program is still relatively new, and good information is vital for continued program development and effectiveness research. Federal reporting requirements can help States to develop solid, comparable information capabilities. Second, concrete reporting requirements could help to maintain a focus on this population, ensuring that they not be lost in the overall spectrum of child welfare services. Third, they could allow ACF to better ensure that independent living funds are actually spent on the target population, and are not diverted to other priorities (a point of greater

importance now that the program has grown in recent years to the level of \$70 million annually). Many State coordinators strongly endorsed a distinct reporting structure for independent living.

The ACF could provide clear, specific, consistent instructions to States on aggregate program reporting requirements before the beginning of the reporting period. Clear instructions could allow States to know specifically what they need to report and give them the advance notice necessary to collect information properly, through whatever data collection systems they choose. These could also help to ensure consistency among the various regional offices and the central office--an issue of particular importance now that regional staff have the responsibility for approving State applications.

- *Provide the States with a simple, standard form for reporting aggregate information.*

A standardized independent living information form could improve the reliability and uniformity of data, while minimizing the burden on the States. A number of State and regional contacts suggested more structured reporting as a means of increasing the usefulness and comparability of the information collected from State independent living programs. This form could be either a free-standing reporting document or part of a broader child welfare report.<sup>22</sup> As ACF and the States move forward along the information highway, such a "form" could actually become an electronic report.

A structured form might include certain standardized data elements, which we discuss below. Standardized data elements might only tell part of the story, however. Because of the great variety of approaches among programs, such a form could also allow for additional quantitative or narrative sections for further explication of State efforts.

Although some initial effort would be required to develop a standard form, and perhaps to solicit comments on it from the States, the long-term savings in time and effort could be substantial. (See appendix C for examples of existing State forms.)

- *Utilize the capabilities of Statewide Automated Child Welfare Information Systems and the Adoption and Foster Care Analysis and Reporting System.*

The easiest way for States to capture the required aggregate information might be to include independent living data elements in the new statewide automated child welfare information systems (SACWIS), for which Federal funding has just been made available. The SACWIS provides ACF with an unprecedented occasion to guide State information strategies; ACF could make concrete efforts to assist States in fully including independent living information in those systems.

The SACWIS regulations call upon States to construct systems that will be "likely to provide more efficient, economical, and effective administration" of their Title IV-B and IV-E programs.<sup>23</sup> Full integration of independent living information into the

States' data systems could streamline their data collection and record keeping processes, as well as help to facilitate the actual integration of independent living into the spectrum of services. An earlier evaluation of the Independent Living Program also recommended the modification of "State and local information systems to include information on independent living services provided to youths as well as to track youths' skill attainment."<sup>24</sup>

The ACF could encourage States to incorporate the standard independent living data set, described below, into their individual SACWIS systems. At a minimum, all States will be required to include in their systems the basic data elements established through the Adoption and Foster Care Analysis and Reporting System (AFCARS).<sup>25</sup> The requirements of this data system could fulfill several functions for independent living, including the provision of demographic data, the identification of eligible youths (through age data and case plan goal), and calculations based on the number of eligible youths (e.g., the number receiving specific services divided by the number eligible). Independent living data collection could also be based on AFCARS standards, such as point-in-time standards for reporting. As ACF considers future refinements to the AFCARS data set, it might want to add a data element identifying youths as participants in the Independent Living Program; for now, the administration could encourage States to include such an element in their SACWIS systems.

- *Encourage electronic reporting specifically for independent living.*

Many States may choose to incorporate independent living data elements into their overall automated child welfare information systems, which could provide for easy collection of data from the local level. The ACF could assist States in their aggregate reporting of such information from the State level to ACF by developing and sharing specialized independent living software and by allowing the electronic submission of information.

Such an effort need not be expensive or overly sophisticated. A simple, standard spreadsheet program, for example, could help all States to aggregate the required information from the field and to submit this to ACF on diskette or on-line. Such software could potentially be used within States for internal reporting of information that is not included in SACWIS from the field to the State coordinator.

#### **Improve the content of independent living reporting:**

- *Establish a standard, basic data set for independent living.*

The ACF could establish a set of standard data elements on which States would report annually, in aggregate; these could be more precise and meaningful than the data currently collected. Such data elements could include basic demographic, service, and outcomes information. Some of these elements (such as demographics) would be required to be included in the State Automated Child Welfare Information System we

discussed above. Others (such as services and status/outcomes) may or may not be part of such a system, depending on each State's design. If individual States choose not to include these elements in their SACWIS, they may have to conduct program-specific data collection activities in order to provide the aggregate information.

The ACF could provide clear instructions as to how such information should be collected and reported (including avoiding duplicate counts). It might also be useful for ACF to provide States with model client-specific data forms that they could use to collect information at point-of-service, district, or county levels.

As noted above, the data collection capabilities and approaches of the States vary greatly; these variations must be borne in mind in developing any standard data set.<sup>26</sup> Any restructuring of the data reporting requirements should be done with advance warning to provide adequate time for States to revamp their internal data collection activities. In addition, State and regional contacts with whom we spoke urged that ACF look carefully at each data element to ensure that it is useful for national program evaluation and research.

The National Independent Living Association (NILA) and some States have made efforts at specifying a basic data set. A number of professionals in the field, however, stressed the need for Federal leadership and direction in this area, and the influence of Federal information requirements on State data collection activities.<sup>27</sup> The ACF could work with these groups in developing a data set, and could reexamine and refine the data elements in the future. This effort would require an investment up front, but could pay off in improved communication and understanding in the future. (See appendix D for more detailed information on data collection.)

- *Facilitate the development of clear definitions of independent living terms.*

A lack of common definitions of terms presents a significant problem in understanding individual State program reports, in comparing programs among States, and ultimately in determining what practices are effective.<sup>28</sup> As one State coordinator put it, "before we can start talking about post-service outcomes, we have to build consensus about the current service interpretations and definitions of what we mean. Not everything works just because we think it does. But right now we can't argue with each other about what's working and what's not working, because we have a different definition of what we're doing." The ACF could play a useful role in facilitating that consensus.

Clear definitions would be vital for the development of a standard data set, as discussed above. On both tasks, ACF could work closely with NILA. Again, the necessary initial investment may well be justified by the improved utility of the information collected. It should be noted that the development and use of uniform service definitions need not limit State flexibility in choosing *which* services to provide.

- *Collect more detailed budget data through the program reporting mechanism.*

To gain both closer accountability for funds and a better sense of program priorities, ACF could collect more detailed and uniform budget information. At a minimum, this might include a required breakdown by expenditures on administration, training, and services.<sup>29</sup>

The ACF could also collect more detailed budget information on State-funded services, in order to gain a better sense of what is really being done for this population. It could also be useful to receive more detailed information on the State match and State maintenance of effort.

Because of substantial variation in how States finance independent living, ACF would have to exercise care in comparing budget figures across States. Nonetheless, such information could raise significant questions for ACF staff which they could pursue in technical assistance and joint-planning discussions with the States.<sup>30</sup>

- *Solicit information on effective practices and innovations.*

Although many States currently provide extensive descriptions of their programs, including examples of their innovative practices, the free-form style of the program reports makes it difficult to gain a comprehensive picture of such activities. The ACF does not explicitly encourage States to detail their innovative approaches.

The ACF could establish categories in which States could, at their option, provide information on important activities that cannot easily be reduced to numbers. State and regional contacts suggested a number of key areas of interest, including aftercare, mentoring, alternative living arrangements, interagency agreements and coordination, youth advisory boards, connections with community resources, staff-youth relationship building, staffing patterns, definitions of success, and outcomes measures. Standard section headings in the program report could provide for a better national picture and for easier comparison among States.

#### **Focus on program performance and outcomes:**

- *Develop performance and outcomes measures for independent living.*

Working with NILA, other national advocacy and research groups,<sup>31</sup> and the States, ACF could establish performance measures for independent living services. Such measures could help to ensure that efforts are focussed on providing the best services and on achieving positive results for the youths being served. As one State coordinator put it, "it's vital to have clear information on progress and outcomes; a lot of open narrative assuages a lack of knowledge about how *well* you're doing." Performance measures could be focussed on key process areas as well as interim and final outcomes for youths.<sup>32</sup>

The ACF is giving substantial attention to performance measurement across its varied programs; the development of measures for independent living could fit well with this broader effort. In fact, the relatively new, distinct, and small nature of the program might make it a good "laboratory" for the development and testing of performance measures.

The ACF and the States could focus on a few measures at first, and then refine and expand these with experience. One possible area in which to begin measuring performance might be educational status.<sup>33</sup> Possible measures could include the percent of youths completing high school before discharge, receiving financial assistance for education, or voluntarily remaining in State custody beyond their 18th birthday in order to complete their educational goals.<sup>34</sup> (See appendix E for a list of additional sample performance measures.)

Such an undertaking would not be easy. There is general agreement among independent living professionals that performance measurement is a weak area. Many States have no experience measuring performance or outcomes (beyond the minimal, required information at 90 days after service). There are wide-ranging views on what constitute successful outcomes for youths, and on how these can best be measured. For example, one of the premises of the program is that it helps to prepare youths for self-sufficient adulthood, free from public assistance. Several State coordinators and consultants suggested, however, that in some cases the ability of a young adult with severe difficulties to access the resources of the welfare system should be viewed as a success, not a failure. In addition, good performance measurement will require reliable numbers, which many States are not now able to produce. There are concerns that any such measures be accurately made and reported, to ensure valid comparability.

Nonetheless, there is wide agreement that the development of performance measures would be an important next step for the field of independent living. The ACF could play a key role in facilitating the development of such measures.

- *Establish general parameters within which States could define specific outcomes and ways of measuring those outcomes.*

State innovation has been one of the key sources of progress in the field of independent living. By allowing States to define outcomes and means of measurement within defined parameters, ACF could both encourage States to think concretely in terms of outcomes, and promote innovative approaches to outcomes measurement.<sup>35</sup>

For example, ACF could require States to define specific, measurable goals in the area of employment readiness. A State could choose to focus its efforts on providing youths with job experience while in care, and could measure its performance in this area by looking at the percent of youths who, at discharge, hold a job, have held a job for at least six months, or have received a raise.

While this approach would have the advantage of promoting innovative strategies for measuring performance and outcomes, it could hinder comparisons among States. This deficiency could be alleviated through the establishment of standard areas for action, and good information sharing on States' experiences with specific measures.

- *Focus on the status of youths at discharge.*

States are currently required to report on the "results achieved 90 days after participants completed the program." As noted above, some States have provided information on youths 90 days after discharge from custody, while others have looked at youth 90 days after completion of a discrete independent living program, perhaps while they are still in care. Most States have also experienced difficulty reaching a substantial number of youths. To provide some consistency to these figures, and to reach a larger percentage of youths, ACF could require States to provide information on how well prepared for independence youths appear to be *at discharge*. This approach could allow States to gather preliminary status/outcomes information on all youths leaving care, and could emphasize the responsibility of the entire child welfare system--not just the independent living program--for youths' readiness for adult life. The ACF could also provide guidance on appropriate methods for reporting such information so as to avoid double counts and inconsistent statistics.

For those States currently providing information on youth *after services* (but perhaps while still in care), this approach could actually provide a look at youths further out, giving a better picture of their preparedness.<sup>36</sup> For those States currently gathering information on youth *after discharge*, this new approach would allow them to get information from the entire population of youth leaving care; they could also continue collecting information from youth after discharge.

Valuable data at discharge might include youths' status in areas such as educational attainment, employment, living arrangements, family relationships, parenthood, use of public assistance, and health. Given the customer focus of ACF's reengineering efforts, it might also be worthwhile to encourage States to ask the youths to evaluate the efforts made to help them prepare for independence.

Information at discharge would only tell part of the story; as noted in one State's internal evaluation, "immediate program outcomes, measured right after program completion, would not necessarily reflect long-term effects."<sup>37</sup> Nonetheless, good information on all youths at discharge could provide a valuable piece of the overall picture. The ACF could also encourage States to voluntarily continue efforts to reach youths after care, in addition to the time of discharge, and could provide guidance to ensure that such information is meaningful and comparable.



- *Encourage and assist State efforts to link independent living data systems with public assistance, unemployment, criminal justice and Internal Revenue Service information systems.*

The SACWIS regulations allow States to design their child welfare information systems in such a way as to interface with other computer systems. The ACF could encourage States to use this capability to track certain youth outcomes--for example, employment status, use of public assistance, and interactions with the criminal justice system. These should not be regarded as the only--or even the best--outcome measures to be tracked. They would, however, provide a key piece of the picture.

Interfacing with such databases could pose some complex problems in terms of confidentiality, and could require extensive negotiations with other agencies. If these difficulties can be overcome, however, this channel could allow for relatively easy long-term monitoring of cohorts of discharged youths. The ACF could share information on the successes of individual States, and could serve as a consultant to agencies attempting to accomplish this sort of data matching.<sup>38</sup>

- *Play an active role in independent living research.*

As the Child Welfare League of America has noted, "to date, most information on independent living is anecdotal. . . . Virtually no recent objective national data exist on the effectiveness of independent living services or on the experiences of youths discharged from out-of-home care."<sup>39</sup> A number of the options outlined above would help improve the quality of information on independent living that is collected and available at both the State and national levels.

Many State and regional contacts with whom we spoke also noted the need for a longitudinal study of participating youths. It is very difficult to follow individual youths after discharge, and such efforts require attention--and in many cases, expertise--beyond the capacity of most State child welfare agencies. The ACF could fill this gap by supporting research projects that would provide better information on the effectiveness of independent living efforts. The ACF could widely disseminate the results.

Studies of this sort could be costly. In the short term, ACF could consider giving priority to such projects within existing research budgets. In the longer term, improved understanding of effective approaches to promoting self-sufficiency could be viewed as a wise investment in prevention.

## **THE ACF SHOULD FOCUS ITS MANAGEMENT AND PROGRAM REPORTING EFFORTS ON INFORMATION SHARING.**

### **ISSUES OF CONCERN:**

*The ACF has not actively facilitated information sharing among States, components of ACF, and other Federal agencies. This lack of good communication may be limiting opportunities for States to improve the quality of independent living services and for ACF to provide effective advice to States and others on the program.*

**The ACF has not generally made available to States information it currently collects and to which it has access.**

The ACF collects program statistics and descriptions from every State through the independent living program reports and applications. The ACF also has access to information related to other youth programs both within and outside of ACF. While some regional offices have made efforts to share information among States, there is no organized or centralized effort to disseminate this information to States or within ACF.<sup>40</sup>

Numerous regional ACF and State officials reported that, in part because information has not been shared effectively, they do not know why much of it is collected or what use is made of it. In fact, several ACF officials, both at the central-office and regional-office levels, noted that program reports are rarely used. A number pointed out that there appears to be no connection between the application and report at the ACF-review level; many State officials complained that they have never received substantive feedback from ACF on either the application or the report.

**The ACF's interactions with States about the program, aside from the reports and applications, have been limited.**

In-person interaction with State independent living staff has been minimal. The ACF has conducted on-site independent living reviews in only six States. Some regional offices have attempted to visit programs in conjunction with other monitoring activities, but such opportunities have been infrequent and brief. Both State and regional officials have found the few on-site reviews useful. Staff in only two regional offices have coordinated or participated in regular meetings of the State coordinators in their region.

Most ACF and State officials with whom we spoke cited a need for greater in-person interaction. Regional staff noted that they would like to visit more State programs more often, but face serious budgetary restrictions on travel. A number of regional staff also thought that the type of regional meetings of State coordinators that are held in two regions would be quite valuable in their own regions.<sup>41</sup>

**State and ACF officials see substantial room for improvement in the program, and view more complete and accurate information sharing as key to such progress.**

All but one State and every regional official we spoke with felt that the State programs would benefit from better information about activities in other States. Many felt that being able to compare States, to learn from the best experiences of other States, and to have a sense of barriers other States have faced would help improve individual programs and the Independent Living Program generally. Several felt better information sharing could speed program improvements by avoiding long development periods.

Many officials in both States and regional offices felt that ACF has not adequately shared information on available Federal resources for youths, including programs inside and outside the Department. Some suggested that ACF would be a logical locus for such information, and hoped that ACF central office and regional office staff would develop expertise and capacity in this area.

#### **OPTIONS FOR IMPROVEMENT:**

The ACF could capitalize on its investment in independent living by effectively gathering, analyzing, and sharing among the States information on the program's successes and difficulties. Such activities could include research and evaluation projects, an information clearinghouse, contracts for technical assistance, or training and support for ACF staff to facilitate State efforts.

Below, we identify several specific activities that ACF could consider. Some of these could be undertaken immediately and with no additional financial commitment. Others would require additional funding. To finance such activities in a tight budgetary environment, ACF could seek a legislative set-aside that would reserve some percentage of the Independent Living appropriation for these purposes. While States would necessarily lose a small portion of their individual grants, they could benefit substantially from the information sharing activities that these funds could support.

#### **Provide written information to the States:**

- *Report on State performance measures.*

As suggested above, ACF could work with NILA, other advocacy groups, and the States to establish performance measures for independent living. In its information-sharing role, ACF could disseminate an annual report on these measures, allowing States to use the information as an impetus for improving their individual programs. Such a report might also be a valuable resource for other youth-focussed programs, outside of the Title IV-E Independent Living Program.

Compiling such a report could require a commitment of staff time and resources on the part of ACF. The agency might also encounter political concerns about making direct comparisons among States. While most ACF regional staff with whom we spoke believed that States would like to compare themselves directly with other States, a number of State officials urged that they not be explicitly ranked against their peers. There was strong interest among States, however, in hard data from which they could themselves draw conclusions and seek answers.

The usefulness of such a report would depend largely on the usefulness of the actual measures used. First, it would need to be a concise, focussed set of measures. Second, it would require clear agreement on the meaning of terms and the methods of measurement. One State coordinator urged, "let's not provide numbers that don't mean anything." Timeliness would also be key.

- *Disseminate qualitative updates on State activities.*

One State coordinator pointed out that "information sharing is the way to get people thinking;" ACF could disseminate useful information on a variety of aspects of independent living services.

Such materials could include compilations of State independent living policies and plans, with annual updates<sup>42</sup>; State-identified innovative areas or effective practices; and State-identified problem areas. State contacts suggested several specific areas in which they would like information from their peers, including aftercare, mentoring, alternative living arrangements, interagency agreements and coordination, youth advisory boards, community resources, outcomes measures, definitions of success, staffing patterns, and in-State evaluation efforts.

The ACF could also explore ways of providing such information by computer, perhaps by linking with NILAnet, the National Independent Living Association's computer bulletin board system. All members of NILA have access to this network, but ACF does not currently make use of it.

- *Share model forms and directories of available resources.*

It could be very useful for ACF to share with the States model youth needs assessment tools, model transition plans and case plans, model curricula, and lists of resources available from other Federal agencies. State coordinators noted that consultant fees for the development of such materials can be quite expensive, and pointed out that many such materials have already been developed in individual States through Federal Title IV-E funds. In the future, ACF may wish to contract for the development of such materials directly, and widely distribute them among the States.

The ACF's efforts in this area might be constrained by resource limits. At the same time, such sharing could prevent unnecessary duplication of effort, and therefore expense, among different States.<sup>43</sup>

### **Facilitate information sharing through ACF staff:**

- *Develop a focus for ACF youth programs in central office and each regional office.*

Several regional contacts identified a lack of coordination on youth services in ACF's central office as a serious problem. They recommended that the youth programs currently in the Family and Youth Services Bureau, including the Runaway and Homeless Youth (RHY) programs, be brought into the Children's Bureau; the administrative structure should follow the needs and the population, they argued, not the funding stream. Staff in one regional office, in which the same branch administers both the ILP and the RHY programs, noted that this organization encourages them "to think comprehensively about the needs of older adolescents." At a minimum, they urged that there be better coordination in central office between the two branches. One regional staffer stressed that memoranda of understanding out of central office would make it easier for the regions (and the States and grantees) to forge coordination and collaboration with other programs.

At the regional level, State officials with whom we spoke would like to see program specialists play a more consultative role through the provision of technical assistance; this is indeed the role that ACF itself is seeking to fill. To play this role well, ACF staff need to be experts in youth issues. One solution might be to designate a full-time youth specialist in central office and in each regional office. These specialists could oversee, or at least coordinate, all youth-focussed ACF programs. To properly fill such a position, a specialist might need training in the area, and might need to attend relevant national and regional conferences. In addition, training could help to ensure a certain level of consistency among regions.

The regional youth specialists could be catalysts for bringing together people from different States--for example, in quarterly coordinators' meetings. They could also facilitate monthly or quarterly conference calls among State independent living coordinators and other State, Federal, and private youth-serving agencies; these could prove to be both productive and cost effective.

At both the central and regional levels, it could be valuable for ACF to have an understanding of its programs from the perspective of the clients they seek to serve. The ACF could establish some means of getting direct youth input, perhaps through youth advisory boards, such as many States have established.

These different activities could require varying levels of commitment. It could be possible, for example, to designate a youth specialist in each region, but not increase opportunities for attendance at conferences. Changes in the organizational structure of the central or regional offices might likewise be accomplished as part of the Department's overall streamlining and reorganization activities.

- *Incorporate independent living issues into other child welfare monitoring activities.*

The ACF is currently exploring ways of addressing independent living in broader child welfare monitoring activities, including Section 427 reviews. This would allow ACF staff regular occasion to interact with States on-site with regard to independent living, and to share information. In reviews of case files, ACF staff could check that appropriate steps have been taken for youths, including appropriate case plan documentation. In addition, ACF staff could use site visits to Runaway and Homeless Youth grantees, many of which also conduct independent living activities, as opportunities to explore relevant issues. Such reviews would be focussed on information sharing, not compliance.

There could be several potential drawbacks to this approach. The ACF staff conducting general child welfare monitoring activities might not be well informed about independent living issues, and might have limited ability to provide constructive advice to the States. More broadly, independent living could be given lower priority than, for example, child abuse and neglect issues. The ACF might want to take steps to ensure that independent living is indeed accorded adequate time and emphasis in such monitoring activities.

- *Become a resource on other Federal programs serving youths, and facilitate coordination among these and the Independent Living Program.*

The ACF staff could play a valuable role as resources for information on services to youths, and could facilitate coordination at the Federal, State, local, and service-delivery levels. One regional staff person suggested that ACF specialists, if well informed, could help State staff to broker interagency relationships and to negotiate the use of resources from other government agencies. He felt that this role could be helpful even at the county or local levels.

While such an approach might entail increased costs or commitment of staff time, a move in this direction could be viewed as a solid investment in improved and streamlined service delivery. It is a concrete example of how ACF could operationalize its vision for a proactive monitoring and technical assistance role.

## COMMENTS ON THE DRAFT REPORT

We shared our draft report with and solicited comments from the Administration for Children and Families (ACF), the Assistant Secretary for Planning and Evaluation, the Assistant Secretary for Management and Budget, and the Assistant Secretary for Legislation. We also solicited comments from the Child Welfare League of America (CWLA) and the National Independent Living Association (NILA).

We received written comments from ACF and from CWLA and NILA. They all concurred with our two recommendations and did not suggest any changes to the report. The CWLA and NILA also commented favorably on several options we offered for each recommendation. We reproduce these comments in appendix F.

# APPENDIX A

## LEGISLATIVE HISTORY

Law	Major Provisions	Funding
P.L. 99-272 (COBRA 85)	<p><u>Added Section 477 to Title IV-E of the Social Security Act:</u></p> <ul style="list-style-type: none"> <li>• Allowed payments to States for independent living services to IV-E foster children for FY's 87-88</li> </ul> <p><u>Amended Section 475 of Title IV-E:</u></p> <ul style="list-style-type: none"> <li>• Required that, where appropriate, the case plans of children age 16 and over include a written description of the services that will be help them to prepare for independent living</li> </ul>	FY 87: \$45 m FY 88: \$45 m
P.L. 100-647 (1989)	<p><u>Amended Section 477:</u></p> <ul style="list-style-type: none"> <li>• Continued program through FY 89</li> <li>• Allowed States to elect to service non-IV-E foster children</li> <li>• Allowed States to elect to provide follow-up services for up to 6 months after discharge from foster care</li> <li>• Prohibited payments for room and board</li> </ul> <p><u>Amended Section 475:</u></p> <ul style="list-style-type: none"> <li>• Required that dispositional hearings for children age 16 and over address the services needed to assist in the transition to independent living</li> </ul>	FY 89: \$45 m
P.L. 101-239 (OBRA 89)	<p><u>Amended Sections 474 and 477:</u></p> <ul style="list-style-type: none"> <li>• Reauthorized program for FY's 90-92</li> <li>• Increased annual funding levels</li> <li>• Required States to provide dollar-for-dollar match for funds over each State's share of the \$45 m base funding</li> </ul>	FY 90: \$50 m FY 91: \$60 m FY 92: \$70 m
P.L. 101-508 (OBRA 90)	<ul style="list-style-type: none"> <li>• Appropriated FY 91 funding</li> <li>• Expanded eligibility to children formerly in foster care, to age 21 (also eliminated provision allowing for services up to 6 months post-discharge)</li> </ul>	FY 91: \$60 m
P.L. 102-394	<ul style="list-style-type: none"> <li>• Appropriated funds for FY 93</li> </ul>	FY 93: \$70 m
P.L. 103-66 (OBRA 93)	<ul style="list-style-type: none"> <li>• Permanently reauthorized the program</li> </ul>	\$70 m per year



# APPENDIX B

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## METHODOLOGY

We have drawn upon five primary sources of information:

- (1) A review of program reports for fiscal years (FY) 1992 and '93, and applications for FY's 1993 and '94, from all 50 States and the District of Columbia; and a sample of State fiscal reports (Standard Form 269).
- (2) Structured telephone discussions with independent living coordinators in ten States: Vermont, New York, Florida, Illinois, Texas, Missouri, Colorado, California, Arizona, and Idaho. These States were selected to reflect diversity of geographic setting, size, population, administrative structure, and program approach. Our choice was based upon both our file review and input from ACF, the National Independent Living Association, and a variety of professionals in the field.
- (3) Structured discussions with ACF staff in central office and each regional office.
- (4) An in-depth site-visit to Pennsylvania to meet with the independent living coordinator, technical assistance and evaluation staff, county-level staff, and staff at a private youth-serving agency. This State was selected based on input from a variety of professionals in the field as an example of a large, county-based State with a well-developed information-reporting system.
- (5) A focus group and discussions with State coordinators and other professionals at the annual conference of the National Independent Living Association (NILA) in March 1994.

In addition, we conducted informal visits to the Massachusetts and Connecticut independent living programs; attended a meeting of the independent living coordinators in Region I; held discussions with consultants, academics, and advocates in the field; reviewed legislation and literature on independent living; and examined ACF program information and directions. We also spoke informally with participating youth from Maine, Pennsylvania, Louisiana, and Arizona.

# APPENDIX C

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## SAMPLE DATA COLLECTION FORMS

On the following pages, we present several examples of data collection forms that have been developed by individual States. We present these as illustrations of the range of approaches and capabilities across the country; we do not specifically endorse these approaches or formats.

Client-level reporting forms: The first three forms are used to collect information on every youth participating in the respective States' independent living programs. Every county or district, and every contractor, must complete such a form for each youth and submit it to the central State office, where the information is aggregated and analyzed.

Example A, page C-2: Minnesota

Example B, pages C-3 to C-6: Kentucky

Example C, page C-7: California

Aggregate-level reporting forms: The fourth example is used by a county-based State to collect aggregate information from each county regarding the services being offered and the number expected to be served. The fifth example, also used by a county-based State, solicits year-end information on youth served.

Example D, pages C-8 to C-10: Pennsylvania

Example E, page C-11: California

# SELF Client Data

Complete form on all youth served.  
**USE NUMBER TWO PENCIL.**  
 Please do not fold

**Date of Birth**

Month	Day	Year
0 1 2 3 4 5 6 7 8 9	0 1 2 3 4 5 6 7 8 9	0 1 2 3 4 5 6 7 8 9

**County Information**

County Number: 0 1 2 3 4 5 6 7 8 9

County: \_\_\_\_\_

Worker: \_\_\_\_\_

Date: \_\_\_\_\_

Last Name	First Name	MI
A A A A A A A A A A	A A A A A A A A A A	A
B B B B B B B B B B	B B B B B B B B B B	B
C C C C C C C C C C	C C C C C C C C C C	C
D D D D D D D D D D	D D D D D D D D D D	D
E E E E E E E E E E	E E E E E E E E E E	E
F F F F F F F F F F	F F F F F F F F F F	F
G G G G G G G G G G	G G G G G G G G G G	G
H H H H H H H H H H	H H H H H H H H H H	H
I I I I I I I I I I	I I I I I I I I I I	I
J J J J J J J J J J	J J J J J J J J J J	J
K K K K K K K K K K	K K K K K K K K K K	K
L L L L L L L L L L	L L L L L L L L L L	L
M M M M M M M M M M	M M M M M M M M M M	M
N N N N N N N N N N	N N N N N N N N N N	N
O O O O O O O O O O	O O O O O O O O O O	O
P P P P P P P P P P	P P P P P P P P P P	P
Q Q Q Q Q Q Q Q Q Q	Q Q Q Q Q Q Q Q Q Q	Q
R R R R R R R R R R	R R R R R R R R R R	R
S S S S S S S S S S	S S S S S S S S S S	S
T T T T T T T T T T	T T T T T T T T T T	T
U U U U U U U U U U	U U U U U U U U U U	U
V V V V V V V V V V	V V V V V V V V V V	V
W W W W W W W W W W	W W W W W W W W W W	W
X X X X X X X X X X	X X X X X X X X X X	X
Y Y Y Y Y Y Y Y Y Y	Y Y Y Y Y Y Y Y Y Y	Y
Z Z Z Z Z Z Z Z Z Z	Z Z Z Z Z Z Z Z Z Z	Z

**Is Youth a Parent?**  
 Yes  No

**Number of Children**  
 1  2  3 or more

**Is Youth Married?**  
 Yes  No

**Race/Ethnicity**

Asian  
 African American  
 Hispanic  
 American Indian  
 White  
 Other \_\_\_\_\_

**Was Youth Served by a SELF Grantee? If so,**

Agency Name \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**FOR STATE USE ONLY**

0 1 2 3 4

**Sex**

Male  
 Female

**Placement Status**

State Ward  
 Voluntary Placement  
 Court Ordered Placement  
 RUM  
 Not in Placement

**Services Provided to Youth**

<input type="checkbox"/> ILS Group Training	<input type="checkbox"/> Educational Referrals/Expenses
<input type="checkbox"/> Retreat/Conference/Workshop	<input type="checkbox"/> Job Experience through SELF
<input type="checkbox"/> Individual ILS Training	<input type="checkbox"/> Purchased Goods, Not for School
<input type="checkbox"/> Camp/Adventure Challenge	<input type="checkbox"/> Stipends/Incentive Payments
<input type="checkbox"/> Driver's Education	<input type="checkbox"/> Other _____

**Total Time in Substitute Care**

<input type="checkbox"/> <6 months	<input type="checkbox"/> 3-5 years
<input type="checkbox"/> 6-12 months	<input type="checkbox"/> 5-7 years
<input type="checkbox"/> 1-3 years	<input type="checkbox"/> >7 years

**Disabling Condition of Youth**

Developmental Disabilities  
 Hearing Speech/Sight  
 Specific Learning Disability  
 Emotional/Behavioral Disability  
 Chemical Dependency  
 Other \_\_\_\_\_

**Current Living Arrangement**

Foster Home  
 Group Home \_\_\_\_\_  
 Residential Treatment \_\_\_\_\_  
 Emergency Shelter \_\_\_\_\_  
 Correctional Facility \_\_\_\_\_  
 Birth Parents:  
 Relatives  
 Independent  
 Other \_\_\_\_\_

**School**

Graduated High School  
 Dropped Out of High School  
 Completed GED  
 Working on GED  
 In Special Ed Program  
 In Alternative High School  
 In Regular High School  
 In College  
 In VoTech

**Highest Grade Level Completed**

<input type="checkbox"/> 8	<input type="checkbox"/> 11	<input type="checkbox"/> 14
<input type="checkbox"/> 9	<input type="checkbox"/> 12	<input type="checkbox"/> 15
<input type="checkbox"/> 10	<input type="checkbox"/> 13	<input type="checkbox"/> 16

# INDEPENDENT LIVING DATA COLLECTION - INDIVIDUAL YOUTH

## DEMOGRAPHIC DATA

NAME: \_\_\_\_\_

SSN: \_\_\_\_\_

DOB: \_\_\_\_\_

SEX:            Male            Female

MARITAL STATUS:    S        M        D

RACE: White    Black    Hispanic    Asian  
          Native American    Other

DISABILITY: (Specify) \_\_\_\_\_

PARENTAL STATUS:            Y        N

NUMBER OF CHILDREN: \_\_\_\_\_

NUMBER CHILDREN LIVING WITH YOUTH: \_\_\_\_\_

HIGHEST GRADE COMPLETED:    9    10    11    12  
 Vocational    1    2    GED    College    1    2    3    4

PLACEMENT HISTORY:

Total time \_\_\_\_\_

Number of entries: \_\_\_\_\_

Number of placements: \_\_\_\_\_

Living arrangement: \_\_\_\_\_

Date into IL program: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

## PROGRAM COMPONENTS

### EDUCATION:

Tutoring/Remedial education	Y	N	NA
GED classes	Y	N	NA
Driver education	Y	N	NA
Higher education	Y	N	NA
Vocational Assessment	Y	N	NA
Special vocational training			

### EMPLOYMENT

Employment status	Y	N	NA
Job placement	Y	N	NA
Employment	Y	N	NA
Employment (subsidized)	Y	N	NA
Length of current employment:	_____		
Length of previous employment:	_____		
Jobs held:	_____		
Type of jobs:	_____		

### SUPPORT GROUPS

Peer groups	Y	N	NA
Transition manager	Y	N	NA
Youth networks	Y	N	NA

### SPECIALIZED SHORT TERM PROGRAMS

Team-Building Retreats	Y	N	NA
Teen Conferences	Y	N	NA

### INDEPENDENT LIVING SKILLS TRAINING

Basic skills assessment	Y	N	NA
Interpersonal skills	Y	N	NA
Communications skills	Y	N	NA
Self-esteem skills	Y	N	NA
Decision-making skills	Y	N	NA
Values clarification skills	Y	N	NA
Time management skills	Y	N	NA
Educational planning skills	Y	N	NA
Health skills	Y	N	NA
Emergency and Safety skills	Y	N	NA
Hygiene skills	Y	N	NA
Personal appearance	Y	N	NA
Leisure time	Y	N	NA
Legal issues	Y	N	NA
First aid	Y	N	NA
Money management	Y	N	NA
Job hunting	Y	N	NA
Transportation	Y	N	NA
Cooking	Y	N	NA
Shopping	Y	N	NA
Housekeeping	Y	N	NA
Apartment living	Y	N	NA
Transitional living	Y	N	NA
Community Resources	Y	N	NA
Consumer skills	Y	N	NA

<b>STIPENDS/SCHOLARSHIPS</b>				<b>DISCHARGE SERVICES (CONTINUED)</b>			
Youth stipends	Y	N	NA	Personal information packet	Y	N	NA
Start-up assistance	Y	N	NA	Discharge conference	Y	N	NA
College stipends	Y	N	NA	<b>SUPERVISED PRACTICE LIVING</b>			
Scholarships	Y	N	NA	IL foster home	Y	N	NA
<b>DISCHARGE SERVICES</b>				IL group home	Y	N	NA
Individual counseling	Y	N	NA	Transitional group home	Y	N	NA
Group counseling	Y	N	NA	Transitional living apartment	Y	N	NA
Securing permanent housing	Y	N	NA	Teen parent services	Y	N	NA

**POST DISCHARGE SERVICES**

<b>VOLUNTEERS/SUPPORT GROUPS</b>				<b>OTHER</b>			
Guardianship for youth with limited abilities	Y	N	NA	Health exams	Y	N	NA
Mentors	Y	N	NA	Dental exams	Y	N	NA
Support groups	Y	N	NA	Health insurance	Y	N	NA
Drop-in center	Y	N	NA	Financial assistance	Y	N	NA
				Referral service	Y	N	NA

**FOLLOW-UP**

DATA ITEM	IL TRAINING COMPLETION	90 DAYS AFTER	6 MONTHS AFTER	1 YEAR AFTER	2 YEARS AFTER
GED					
High School Diploma					
Vocational Training					
Obtained Housing					
Employed					
Independent of Agency					
Individual Counseling					
Group Counseling					
Budgeting					
Housing					
Career Planning					

## INDEPENDENT LIVING DATA

*Instructions for Completing Data Sheets for Individual Youth*

### DEMOGRAPHICS

- NAME:** Youth's first name, middle initial, and last name.  
Do not forget to include the middle initial.
- SSN:** Youth's social security number.
- DOB:** The month, date, and year of youth's birth.
- SEX:** Circle appropriate gender.
- MARITAL STATUS:** Circle S [Single], M [Married], or D [Divorced].
- RACE:** Circle appropriate race.
- DISABILITY:** The following conditions are included in this item.  
The conditions must be "clinically diagnosed."  
Developmental disability, Emotional disability,  
Specific learning disability, Hearing, sight or  
speech impairment, Physical disability, other  
clinically diagnosed conditions.
- PARENTAL STATUS:** This item refers to whether or not youth have  
children of their own.
- NUMBER OF CHILDREN:** The number of children youth has, whether or  
not child lives with the youth.
- NUMBER OF CHILDREN  
LIVING WITH YOUTH:** The number of the youth's own children  
living with the youth.
- HIGHEST GRADE COMPLETED:** Circle appropriate grade level.
- PLACEMENT HISTORY**  
Total time: The total number of months/years the youth was  
in foster care, (excluding time spent at home), at  
the beginning of the program.
- Number of entries: This item includes the total number of re-entries  
(including the initial entry) that a youth has had.  
A re-entry into substitute care is counted if the  
youth re-enters substitute care after having been  
formally discharged from substitute care with the  
intent of permanently placing the youth in an in-  
home living arrangement.

Number of placements:	The total number of different placements (living arrangements) youth has had while in care.
Living Arrangement:	This item refers to the living arrangement for the youth at the time of entry including: Emergency Shelter, Non-Relative foster home, Relative foster home, Pre-Adoptive home, Group Home, Drug Rehab Program, Psychiatric Institution, Residential Care Facility, Secured Facility (Detention), Independent Living Arrangement.
Date into IL Program:	The date the youth began the IL Program.

**PROGRAM COMPONENTS**

These items refer to training or services offered by your program. Circle Y [Yes] if youth received the training or service component. Circle N [No] if youth did not receive the training or service. Circle NA [Not Applicable] if your program does not offer the training or service component.

**POST DISCHARGE SERVICES**

These items refer to services received by youth after being released from commitment, although some of the services (particularly guardianship and mentors) are usually initiated prior to the youth's release from care. If the youth has been paired with a mentor, even before release, please circle Y.

**FOLLOW-UP**

These data items refer to the status of the youth at the completion of your program, and at selected time intervals after completing your program. They require Y [Yes] or N [No] answers, in terms of items **completed** at the specified time interval. Thus, if a youth has obtained a GED or high school diploma, completed vocational training, obtained housing, is employed, is independent of the agency, has received individual counseling or group counseling, put a "Y" in the appropriate box. If the youth has not obtained the items, put an "N" in the appropriate box. If a youth is in the process of obtaining the items, put an "N" in the appropriate box.

The **last three items** refer only to **training received in your program**. Were the youth trained in budgeting, housing and career planning? If so, answer "Y" in the column labeled "IL Training Completion". If the youth were not trained in these items, answer "N". Leave all other columns blank for these three items.

*Remember to fill in the blanks at the bottom of the first page, indicating your district or agency's name, your name, and the date. If you have any questions please call Mike Yocum at (502) 564-2136, Thank you for your help in obtaining this data.*

**INDEPENDENT LIVING SKILLS PROGRAM****INDIVIDUAL CLIENT CHARACTERISTIC DATA**

CLIENT NAME

DATE

PCIS CASE NUMBER/UNIQUE I.D.

**D1) CLIENT PROFILE:**

IV-E ELIGIBLE: <input type="checkbox"/> Yes <input type="checkbox"/> No	ACCEPTED ILSP SERVICES (DATE)	DECLINED ILSP SERVICES (DATE)
PARENTAL STATUS: <input type="checkbox"/> Childless <input type="checkbox"/> Parent _____ Children	<input type="checkbox"/> Expectant Father <input type="checkbox"/> Expectant Mother	SPECIAL NEEDS: <input type="checkbox"/> Educational <input type="checkbox"/> Medical
	<input type="checkbox"/> Mental <input type="checkbox"/> Physical	TRAINING GOAL: <input type="checkbox"/> HS Diploma <input type="checkbox"/> GED
		<input type="checkbox"/> Voc Ed <input type="checkbox"/> College <input type="checkbox"/> Adult Ed

**D2) ILSP DIRECT SERVICES TO BE PROVIDED (as appropriate):**

Access to Community Resources	Interpersonal/Social Skills
Consumer Skills	Money Management
Health Care	Parenting
Home Management	Time Management
Housing Options/Location	Transportation
OTHER (SPECIFY)	

COUNSELING: <input type="checkbox"/> Group <input type="checkbox"/> Individual	TUTORING (TUTORING SERVICES FOR A YOUTH WHICH ARE NOT REQUIRED TO BE PROVIDED THROUGH A SCHOOL DISTRICT): <input type="checkbox"/> Group <input type="checkbox"/> Individual <input type="checkbox"/> Personal Computer Tutorial Package		
EXIT PACKET CONTENTS: (OPTIONAL) <input type="checkbox"/> Birth Records <input type="checkbox"/> Placement Records	<input type="checkbox"/> Community Resource Listing <input type="checkbox"/> Social Security Care	<input type="checkbox"/> Educational Certification <input type="checkbox"/> Work Registration	<input type="checkbox"/> Health Records <input type="checkbox"/> Other

**D3) CLIENT OUTCOMES/TERMINATION:**

AWARDED HIGH SCHOOL DIPLOMA (DATE)	AWARDED GED (DATE)	SUCCESSFULLY COMPLETED VOC ED (DATE)	SUCCESSFULLY COMPLETED ADULT ED (DATE)
ENROLLED IN COLLEGE (DATE)	CONTINUED HIGH SCHOOL/GED/VOC ED ENROLLMENT (DATE)	ENROLLED IN ADVANCED SKILLS TRAINING (DATE)	
EMPLOYED <input type="checkbox"/> FT <input type="checkbox"/> PT	<input type="checkbox"/> Actively Seeking	<input type="checkbox"/> Entered Job Corps	ENTERED MILITARY (DATE)
UNEMPLOYABLE/SSI ELIGIBLE (DATE)	UNEMPLOYED/NOT ACTIVELY SEEKING		
UNEMPLOYED (NOTE PROBLEM AREA(S))			
YOUTH CONTINUES IN ILSP	YOUTH NO LONGER IV-E ELIGIBLE (DATE)	LIVING INDEPENDENTLY OF AGENCY MAINTENANCE PROGRAMS (DATE)	
PERSONAL SERVICES CONTRACT WITH THIS YOUTH (ATTACH COPY) <input type="checkbox"/>	OBTAINED COMMUNITY SERVICES	DID NOT OBTAIN OTHER COMMUNITY SERVICES (NOTE PROBLEM AREA(S))	
HOUSED (IDENTIFY TYPE)			
RETURNED TO FAMILY (DATE)			
TRANSFERRED TO ILSP IN ANOTHER COUNTY (DATE)	MOVED/WHEREABOUTS UNKNOWN (DATE)		

**D4) 90-DAY FOLLOW-UP AFTER TERMINATION (includes termination of services due to cessation of outside funding.)**

MODE OF CONTACT:	FACE-TO-FACE (DATE)	TELEPHONE (DATE)	MAIL (DATE)
FAILURE TO CONTACT:	MOVED	OTHER	

CASE VIGNETTE, SUMMARY

SUMMARY COMPLETED BY:

DATE



DEPARTMENT OF PUBLIC WELFARE  
OFFICE OF CHILDREN, YOUTH AND FAMILIES

**TITLE IV-E INDEPENDENT LIVING PROGRAM  
NEEDS AND SERVICE PROJECTION**

COUNTY: \_\_\_\_\_

SERVICE NEEDS	A	B	IL SERVICE PROJECTION	A	B
	RECEIVE IV-E PM	NO IV-E PM		RECEIVE IV-E PM	NO IV-E PM
1. All children in placement			5. Number of NEW youth to receive IL services during the grant year		
2. Youth in placement 16 yrs. of age & older			6. Number of youth carried forward from PRIOR grant year		
3. Youth turning 16 yrs. of age during the grant year			7. TOTAL number of youth to receive IL services during the grant year		
4. Other youth who could benefit from IL					

**SUMMARY OF PROPOSED IL PROGRAM**

**I. SERVICES TO BE PROVIDED (Check as many as apply. Each checked service must be accompanied by a corresponding program description form.)**

- |   |  |
|---|--|
| <input type="checkbox"/> A. Needs Assessment/Case Planning<br><input type="checkbox"/> B. Life Skills Training<br><input type="checkbox"/> C. Vocational Training<br><input type="checkbox"/> D. Remedial Education/Tutoring<br><input type="checkbox"/> E. Preparation for GED<br><input type="checkbox"/> F. Individual or Group Counseling<br><input type="checkbox"/> G. Assistance in Obtaining Higher Ed.<br><input type="checkbox"/> H. Job Placement<br><input type="checkbox"/> I. Subsidized Employment | <input type="checkbox"/> J. Practice IL PLacement (SIL)<br><input type="checkbox"/> K. Location of Permanent Housing<br><input type="checkbox"/> L. Stipends for Youth<br><input type="checkbox"/> M. Aftercare Services<br><input type="checkbox"/> N. Services for Teen Parents<br><input type="checkbox"/> O. Retreats/Camps<br><input type="checkbox"/> P. Indirect Services<br><input type="checkbox"/> Q. Program Administration<br><input type="checkbox"/> R. Other: (Specify below) |
|---|--|

**II. PROVIDERS OF SERVICES CHECKED IN I. -- SERVICES TO BE PROVIDED**

Letter (s) of Service (s) Checked	Provider

# TITLE IV-E INDEPENDENT LIVING GRANT PROGRAM DESCRIPTION

COUNTY:
PROVIDER:

Complete a separate sheet for each provider.

## B. Life Skills Training

I. How many youth will receive life skills training?

Total #     # IV-E

II. Show the total number of hours of life skills instruction each IL participant receives.

\_\_\_\_\_ Hours

III. How is training provided?

Individual     Group     Both

If "Both" was chosen, show the percent of time for each. Use the hours in II as the basis for the calculation.

\_\_\_\_\_ % Individual                      \_\_\_\_\_ % Group

IV. From the list below and on Page 2 of this form, identify the subject areas covered in your life skills training course. Check as many as apply.

### Financial Responsibility

Budgeting  
 Banking  
 Personal Identification

### Vocational Skills

	Aptitude/Interest
	Job Seeking
	Job Interviewing
	Work/Dress Habits
	Job Retention

### Consumer Skills

Shopping  
 Nutrition  
 Food Preparation  
 Contracts/Leases  
 Apartment Location

### Community Resources

	Public Transportation
	Health Care
	Human Services Access
	Legal Services

**TITLE IV-E INDEPENDENT LIVING GRANT  
PROGRAM DESCRIPTION**

COUNTY:
PROVIDER:

Complete a separate sheet for each provider.

**B. Life Skills Training (Cont'd.)**

**Interpersonal/Communication Skills**

- Problem Solving
- Decision Making
- Self Esteem
- Human Sexuality
- Impulse Control
- Assertiveness
- Individual/Group Interactions

**Life Skills Practice (Structured)**  
If practice is described elsewhere, just cross-reference here.

**Other – Describe**

V. How many youth will practice IL Skills?

Total #       # IV-E

VI. Estimate the total cost of providing life skills training. Include in the estimate the cost of staff to provide the training, the cost to purchase the training, training materials and supplies and transportation to get youth to and from training. The amount of the estimate should agree with the amount on the CY-809. Do not include Aftercare Life Skills Training costs here.

\$ \_\_\_\_\_

# INDEPENDENT LIVING PROGRAM (ILP)

Annual Statistical Report

Federal Fiscal Year 1990

(October 1, 1989 through September 30, 1990)

Send One Copy to:  
 Department of Social Services  
 Statistical Services Bureau  
 744 P Street, M.S. 19-81  
 Sacramento, CA 95814

COUNTY	CODE
--------	------

## PART A: YOUTHS SERVED AND CLIENT CHARACTERISTICS

1. Youths to whom ILP services were offered during the year. ....		1	
2. Youths who received ILP services during the year.....		2	
a. Youths who are single.....	2a		
b. Youths who are married.....	2b		
3. Youths who are parents.....		3	
4. Youths who have special needs which are educational, medical, mental, and/or physical in nature.....		4	
5. Youths who received ILP services during the six month period following exit from foster care .....		5	

## PART B: PROGRAM OUTCOME/CLIENT PROGRESS

6. Youths who completed ILP services or a component of services .....		6	
7. Youths who are continuing to receive ILP services.....		7	
8. Youths who completed high school/GED or adult education.....		8	
9. Youths continuing and/or currently enrolled in high school/GED or adult education.....		9	
10. Youths who have completed vocational education or on-the-job training .....		10	
11. Youths continuing and/or currently enrolled in vocational education or on-the-job training .....		11	
12. Youths enrolled in college .....		12	
13. Youths who obtained either full-time or part-time employment .....		13	
14. Of the number of youths reported in Item 13 above, those who are military or Job Corps enlistees.....		14	
15. Youths actively seeking employment .....		15	
16. Youths determined unemployable, SSI eligible, or other similar special category .....		16	
17. Youths who are living independently of agency maintenance programs .....		17	
18. Youths who obtained housing and other community services.....		18	
19. Youths for whom no information could be obtained .....		19	

PERSON TO CONTACT	TELEPHONE NUMBER	DATE
-------------------	------------------	------

# APPENDIX D

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## SAMPLE DATA ELEMENTS

In the body of this report, we propose that ACF could develop a standard set of data elements to be reported on each youth participating in independent living services, to be reported annually, in aggregate. We suggest that ACF could encourage the States to include many of these elements in their new SACWIS systems.

On the following pages, we present some examples of the types of data elements that ACF might consider adopting. We have divided the information into three categories (demographics, services, and status/outcomes), and present the data elements, the reporting timeframe, and the source.

These suggestions build on recommendations to us by the Data Collection Task Force of the NILA, as well as the current ACF data requirements.

<b>DEMOGRAPHICS</b>		
<b>Element</b>	<b>At what point in time:</b>	<b>Source:</b>
# 16-17 year olds in substitute care	cumulative, end of year	SACWIS/AFCARS
# 16-17 year olds with a goal of independent living	cumulative, end of year	SACWIS/AFCARS
# 16-17 year olds for whom independent living services are considered "appropriate"	cumulative, end of year	ILP data
# 16-17 year olds who participated in independent living services	cumulative, end of year	SACWIS
# 18-20 year olds still in care who participated in independent living services	cumulative, end of year	ILP data
# discharged youth who returned to receive independent living services	cumulative, end of year	ILP data
# of those participating of each race/ethnic group (W, B, A, H, AI, O)	cumulative, end of year	SACWIS/AFCARS
# of those participating of each sex (M, F)	cumulative, end of year	SACWIS/AFCARS
# of those participating with a disabling condition	cumulative, end of year	SACWIS/AFCARS
# of those participating who were IV-E eligible	cumulative, end of year	SACWIS/ILP data
length of time in care of those participating	cumulative, end of year	SACWIS/AFCARS

<b>SERVICES</b>		
<b>Element</b>	<b>At what point in time:</b>	<b>Source:</b>
educational assistance  tutoring stipend/scholarship	cumulative annual total participating	SACWIS or ILP data  (depends on design of each State's SACWIS)
employment assistance  job placement job apprenticeship job mentoring	"	"
group life skills training (list of topics)	"	"
formal, individual life skills training (list of topics)	"	"
pre-discharge financial assistance (non-school stipend)	"	"
post discharge financial assistance	"	"
mentoring arrangement	"	"
supervised practice living arrangement -- before age 19	"	"
supervised practice living arrangement -- age 19+	"	"
medical coverage	"	"
teen retreat/conference/wilderness experience	"	"
support groups	"	"
discharge services (specialized counseling, housing placement, etc.)	"	"

<b>STATUS/OUTCOMES</b>		
<b>Element</b>	<b>At what point in time:</b>	<b>Source:</b>
Educational status (highest grade completed)	cumulative annual frequencies, collected at at discharge  (and at some point after discharge, if so decided)	SACWIS or ILP data system  (depends on design of each State's SACWIS)
Employment status  # employed # employed for at least six months	"	SACWIS or ILP data system  (depends on design of each State's SACWIS)  Interface with unemployment and IRS data
public assistance status  AFDC Medicaid Food Stamps other assistance	"	SACWIS or ILP data system  Interface with unemployment and IRS data
marital status  # single # married	"	SACWIS or ILP data system
# females who are pregnant	"	"
# number of children (0, 1, 2, 3+)		"
housing status  IL subsidized other publicly subsidized parents independent other		"
# staying in care voluntarily (to complete school, etc.)		ILP data system



# APPENDIX E

## SAMPLE PERFORMANCE MEASURES

In the body of this report, we propose that ACF could facilitate the development of performance and outcomes measures for independent living. Below, we present examples of measures that ACF and the States might consider adopting.

<b>PROCESS MEASURES</b>	
<b>Measure</b>	<b>Source</b>
Percent of eligible youth receiving a formal assessment of independent living strengths and needs in a timely fashion (e.g., before or at age 16)	ILP data collection
Percent of eligible 16 & 17 year olds participating in the IL program	SACWIS
Percent of eligible youth receiving each of certain specific services (e.g., group life skills classes, financial stipends, etc.)	ILP data collection
Percent of participating youth completing all services identified in individual case plan	ILP data collection (eventually, SACWIS)
Number of discharged youth returning for IL services	ILP data collection
Percent of participating youth remaining in care voluntarily past their 18th birthday in order to continue in school	ILP data collection

<b>STATUS/OUTCOMES MEASURES</b>	
<b>Measure</b>	<b>Source</b>
Percent of participating youth holding a job at discharge	ILP data collection at discharge
Percent of participating youth having held a job for at least 6 months at discharge	ILP data collection at discharge; interface with unemployment and IRS data
Percent of participating youth completing high school by discharge	ILP data collection at discharge
Percent of participating youth continuing to higher education	ILP data collection at discharge
Percent of participating youth avoiding early parenthood by discharge	ILP data collection at discharge

<b>STATUS/OUTCOMES MEASURES</b>	
<b>Measure</b>	<b>Source</b>
Percent of participating youth independent of public assistance at discharge	ILP data collection at discharge; interface with unemployment and IRS data
Percent of participating youth responding positively in a survey evaluating the services they received (at discharge)	ILP discharge survey

# APPENDIX F

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## COMMENTS ON THE DRAFT REPORT

In this appendix, we present in full the comments on the draft report offered by the Administration for Children and Families (ACF) as well as the Child Welfare League of America and the National Independent Living Association.



DEPARTMENT OF HEALTH & HUMAN SERVICES

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ADMINISTRATION FOR CHILDREN AND FAMILIES  
Office of the Assistant Secretary, Suite 600  
370 L'Enfant Promenade, S.W.  
Washington, D.C. 20447

August 30, 1994

TO: June Gibbs Brown  
Inspector General

FROM: Assistant Secretary  
for Children and Families

SUBJECT: OIG Draft Report: "Independent Living Program for  
Foster Care Youths: Strategies for Improved  
Administration for Children and Families  
Management and Program Reporting," OEI-01-93-00090

Thank you for the opportunity to comment on the above-noted  
draft report.

We generally concur with its findings and the two broad  
strategy recommendations that are outlined in the report.  
The options presented will be very useful for us to consider  
in our attempts to improve our management of the program.

We look forward to receiving a copy of the final report and  
we appreciate the efforts made by your staff in its  
development.

Mary Jo Bane



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 Jean Altagosa  
 (916) 599-4565

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 181 Apple Avenue  
 Suite 117  
 Ottawa, ON K2M 1T6  
 (613) 745-1111  
 FAX (613) 745-1111  
 Canada 1-800-387-1111  
 (613) 745-1111

August 10, 1994

June Gibbs Brown  
 Inspector General  
 Department of Health & Human Services  
 Washington, D.C. 20201

Dear Ms. Brown:

Thank you for this opportunity to review and comment on the draft inspection report entitled "Independent Living Program for Foster Care Youths: Strategies for Improved ACF Management and Program Reporting". The Child Welfare League of America (CWLA) is committed to improving services to the at-risk youths served by the Title IV-E Independent Living Program (ILP).

CWLA supports the two main recommendations your office has made to improve the ILP; that ACF restructure the application and program reporting procedures for the ILP to more effectively support State planning and to give ACF an accurate national picture of independent living efforts and that ACF should focus their restructuring efforts on information sharing.

**APPLICATION AND PROGRAM REPORTING PROCEDURES**

In order to gain an "accurate national picture of independent living efforts", it is recommended that ACF move to a single, multi-year plan which consolidates child welfare services, family support and preservation services, and independent living. CWLA supports this suggestion with the addition of guidelines for development of State plans with specific youth and independent living sections.

CWLA supports the recommendation to strengthen independent living reporting mechanisms by retaining a distinct focus on independent living and youths in any State child welfare reporting system. This would require ACF first to adopt standardized definitions of terms and then to provide the States with detailed reporting instructions based on these terms. ACF could then develop the standardized independent living information form, as recommended in your report.



August 10, 1994

Page 2.

ACF should play a key role in developing performance and outcome measures for independent living, as recommended in the report. Existing efforts in this area should not, however, be forgotten. ACF could coordinate and direct efforts to bring together research and advocacy groups to focus on outcome measures. ACF could also focus on assessment information on youths to more accurately track changes in status for outcomes.

The report discusses the confusion around measuring "results achieved 90 days after participants completed the program". CWLA supports moving to outcomes at discharge with ACF encouraging states which currently track youths beyond discharge to continue to do so. CWLA also supports the involvement of the young people in program evaluation efforts at discharge.

#### FOCUS ON INFORMATION SHARING

CWLA supports the recommendation that ACF develop a mechanism for sharing information about program services as well as best practice information and models received from the states. This would reduce duplication of efforts in many areas and save the states considerable time and resources.

The report recommends the introduction of central office "youth specialists" to provide technical assistance and consultation to the states and to local programs. CWLA supports this recommendation and views this as one more step towards ensuring that the needs of vulnerable youths do not get lost in the efforts to consolidate child welfare service application and reporting.

CWLA welcomes this opportunity to provide input on this important process. Please do not hesitate to contact me or Nancy Pepler, our Program Director of Youth Services, at (202) 638-2952, should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "David S. Liederman", with a long horizontal line extending to the right.

David S. Liederman  
Executive Director



August 8, 1994

June Gibbs Brown  
Department of Health and Human Services  
Office of the Inspector General  
330 Independence Avenue, Room 5250  
Washington, D. C. 20201

Dear Inspector Brown:

The Board and membership of the National Independent Living Association (NILA) join me in expressing my appreciation to you for allowing us to comment on the draft of the report, "Independent Living Program for Foster Care Youths: Strategies for Improved ACF Management and Program Reporting" that has been prepared for the Department of Health and Human Services Administration for Children and Families. We were pleased to be consulted regularly by Tim Corbett and Dave Veroff during the development of the report, it is obvious that our input was utilized in the formulation of recommendations.

I have provided our comments on each "Option for Improvement" in the order in which they appear in the document, beginning on page 8.

1. *Create a consolidated State plan for child welfare services that includes independent living. (page 8)*

NILA supports this recommendation, especially when combined with #4 below.

2. *Require states to establish measurable goals and targets, and to report on their progress. (page 9)*

We recognize the need for outcome measures; however, federal staff should exercise caution in establishing guidelines in this area to avoid implementation of simplistic measures that may not be a true indication of the success of independent living services. NILA offers our assistance and support in the development of outcome measures.

National Independent Living Association

202 West Eighth Street    Tulsa OK 74119-1419    918/585-2986    FAX 918/592-1841

3. *Adjust the timing of the State plan and the grant award. (page 10)*

NILA wholeheartedly supports this recommendation.

4. *Retain a distinct focus on independent living and youths in any State child welfare reporting system. (page 10)*

NILA wholeheartedly supports this recommendation.

5. *Provide the States with a simple, standard form for reporting aggregate information. (page 11)*

NILA supports this recommendation, we would hope that any such form will eventually be automated.

6. *Utilize the capabilities of Statewide Automated Child Welfare Information Systems and the Adoption and Foster Care Analysis and Reporting System. (page 11)*

NILA supports this recommendation. It should be noted that any new requirements for states to include independent living in their SWACWIS must be done promptly as a number of states are already in the development stage.

7. *Encourage electronic reporting specifically for independent living. (page 12)*

NILA supports this recommendation.

8. *Establish a standard, basic data set for independent living. (page 12)*

NILA supports this recommendation and offers our support in the selection of the elements in the data set.

9. *Facilitate the development of clear definitions of independent living terms. (page 13)*

NILA supports this recommendation and the Data Collection Task Force offers to develop draft definitions.

10. *Collect more detailed budget data through the program reporting mechanism. (page 14)*

NILA supports this recommendation; however, we urge federal staff to keep budget categories broad.



17. *Report on State performance measures. (page 19)*

NILA supports this recommendation.

18. *Disseminate qualitative updates on State activities. (page 20)*

NILA supports this recommendation.

19. *Share model forms and directories of available resources. (page 20)*

NILA supports this recommendation.

20. *Develop a focus for ACF youth programs in central office and each regional office. (page 21)*

NILA supports this recommendation. Implementation of this recommendation would provide tremendous support to state agency staff who are isolated throughout the country.

21. *Incorporate independent living issues into other child welfare monitoring activities. (page 22)*

NILA supports this recommendation.

22. *Become a resource on other Federal programs serving youths, and facilitate coordination among these and the Independent Living Program. (page 22)*

NILA supports this recommendation.

The Independent Living Coordinator from Pennsylvania asked that I also mention that the Pennsylvania reports referred to as the end of the year report is actually the application that counties submit for funding.

Any review of the IV-E Independent Living Initiative would be incomplete if it did not include information on the quality of the staff. Mike Ambrose and Irene Hammond are significant assets to the IV-E-IL program. They have been diligent in keeping the states informed of developments in the program. It is amazing that they have been able to be so supportive of the states with so few staff resources. Any recommendations on this program would be incomplete if they did not include a recommendation to increase the number of staff and travel money for this program.

11. *Solicit information on effective practices and innovations.* (page 14)

NILA supports this recommendation.

12. *Develop performance and outcomes measures for independent living.* (page 14)

NILA supports this recommendation with the reservations voiced about #2. NILA welcomes the opportunity to be involved in the development of these measures.

13. *Establish general parameters within which States could define specific outcomes and ways of measuring those outcomes.* (page 15)

NILA strongly supports this recommendation. This recommendation must be implemented if states are going to be given the latitude to develop their own outcome measures.

14. *Focus on the status of youths at discharge.* (page 16)

NILA supports this recommendation; however, we do not believe that we should "focus" on youth only at discharge. We recommend that the language be changed to indicate that discharge is one point at which information should be obtained. Youths should be looked at on several occasions: at age 16, at discharge, and at different points in time after the youth is discharged from care.

15. *Encourage and assist State efforts to link independent living data systems with public assistance, unemployment, criminal justice and Internal Revenue Service information systems.* (page 17)

NILA strongly supports this recommendation.

16. *Play an active role in independent living research.* (page 17)

NILA strongly supports the federal central office contracting for national research on independent living, especially longitudinal studies to follow youths for years after they leave care. At this point in time, several states are lapsing IV-E-IL "matching" funds. We recommend that some of these funds be utilized to help fund central office functions such as research.

June Gibbs Brown - Inspector General  
August 8, 1994  
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Lastly, we want to commend the work of Tim Corbett and David Veroff. Both of these young men spent a tremendous amount of time and energy working with us to secure our opinions and recommendations. We commend Tim and David for excellent work in blending divergent perspectives and developing an excellent report. If they are representative of the caliber of your staff, you are a very fortunate administrator.

Please feel free to call me at 512/450-3309 if you have any questions regarding our comments. Again, thank you very much for providing us the opportunity to comment on the report.

Sincerely,



Thomas Chapmond  
Chairperson

c: Mike Ambrose  
Irene Hammond  
Timothy Corbett  
David Veroff  
NILA Board Members

# APPENDIX G

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## NOTES

1. Child Welfare League of America, *Standards for Independent Living Services*, 1989, section 1.2, p. 10.
2. Westat, Inc., *A National Evaluation of Title IV-E Foster Care Independent Living Programs for Youth*, HHS contract 105-87-1608, Phase I, Vol, I, p. 4-1.
3. Consolidated Omnibus Budget Reconciliation Act of 1985 (P.L. 99-272). This law provided funding to States for services to youth in foster care who were 16 to 18 years of age and who were receiving foster care maintenance payments under Title IV-E of the Social Security Act, which is tied to eligibility for Aid to Families with Dependent Children (AFDC). Subsequent amendments to the law provided additional funds and made various changes in eligibility and oversight requirements, including giving States the option of providing independent living services to non-Title-IV-E children and to youth up to age 21.

Funds are allocated on the basis of each State's relative share of the nation's population of foster-care children in 1984; this base year has not been updated since the start of the program. The first \$45 million requires no cost sharing; the remaining \$25 million requires a dollar-for-dollar State match, which can be in-kind or cash. Each fiscal year's grant is paid out in quarterly payments, and must be spent by the end of the fiscal year following the fiscal year in which the award was made.

4. Administration for Children, Youth, and Families, Program Instruction (ACYF-PI-93-01), December 10, 1993.
5. There has been one formal evaluation of federally funded independent living programs, conducted in 1988-90 by the consulting firm Westat, Inc., under contract to ACF (see note 2). That study concluded that "the passage of P.L. 99-272 has had a dramatic effect on the development and implementation of independent living policies and services" in the States. The study also determined that such services have the potential to improve outcomes for youth, and that education and employment opportunities appeared to be of particular importance.

6. Originally, States were required to submit quarterly fiscal reports (Standard Form 269) on the independent living grant; because of the two-year expenditure period for the grant, each annual grant generally entailed 8 reports.

Recently, the reporting schedule has been revised--in part to reflect the late awarding of the grant. Three reports are now required, one at the end of the first fiscal year of the expenditure period, one at the middle of the second year, and a third at the end of the second year.

7. The ACF's grants reengineering process entails a reexamination of the fiscal administration and oversight of the host of grants within the purview of the agency. Our report does not address fiscal reporting requirements; we expect that ACF will give full consideration to the ILP grant as part of the reengineering process.
8. *Report of the Administration for Children and Families' Monitoring Team, Draft, April 1994.*
9. Other recent program initiatives will also have an impact on all ACF child welfare programs, including the ILP. First, through the Family Preservation and Family Support Act, ACF will move to prevent crises by proactively assisting at-risk families. Second, through the Adoption and Foster Care Analysis and Reporting System (AFCARS), ACF has established a required basic data set for each child in substitute care. Third, through the State Automated Child Welfare Information System (SACWIS), ACF will provide funding and direction for the development of computer hardware and software for State child welfare programs.
10. Most OIG reports focus largely on detailing program, policy, or administrative deficiencies in separate section entitled "Findings."
11. Through the Runaway and Homeless Youth (RHY) Programs, ACF directly funds competitively selected public and private agencies to provide services, including housing, to these groups of youth. Many of these providers also serve youths who are still in foster care, through contracts to States for the provision of independent living services.

In ACF central office, the RHY programs are administered by the Family and Youth Services Bureau. At the regional level, the organizational structure varies. In five regions, the ILP and the RHY programs are located within the same branch. In other regions, the RHY programs are located in the Head Start Branch, which similarly provides direct grants to service providers (as opposed to State governments).

12. The enabling legislation for the program requires each State to submit an application for funds, separate from its general child welfare plan. In the early years of the program, this requirement ensured that States paid particular

attention to independent living and youth. This separate application process also allowed the States and ACF to be somewhat flexible in planning, given the program's initially temporary status and uncertain future.

It should be noted that some States have included independent living more comprehensively in their planning efforts than others. Some regional offices, likewise, have made a point of including independent living in the joint planning process.

13. The application is due by February 1st, and funds generally are not awarded until the third quarter of the fiscal year. The earliest date that application are accepted is October 1st, while this year, the program instruction regarding the application did not go out until December 10th.
14. Although there is no standardized reporting format for the States, ACF does require that regional staff use a standard checklist in reviewing the applications and reports. In one region, the staff with whom we spoke had shared this form in advance with the States, so that they could collect the specific information correctly. In fact, one State coordinator had copied this form and given it to his district staff, so that they too could collect the right information throughout the year. The coordinator simply compiled these reports from the districts, both monthly and annually.
15. The ACF does ask States to provide in their program reports "a complete record of the purposes for which the funds were spent." States have interpreted this requirement very loosely, however. For example, one regional staffer noted that one State in his region provided a three page budget, detailing all expenses, while another provided only a three line budget, outlining Federal, State, and total expenditures.

Fiscal reporting requirements (as opposed to program reporting requirements) are very minimal.

16. Only 2 of the 11 States with whom we spoke had fully automated systems for independent living information, while 4 others could obtain some relevant information from their States' general child welfare computer systems. In a number of States, the independent living coordinator has access only to aggregate information on the numbers of youth served in counties, districts, or regions; in others, the coordinator has access to information on a per-youth basis. At least one State has no separate reporting capability for independent living. In several States, the coordinator has no line authority over the staff providing services, which can limit the ability to access information.
17. States noted that youth are very anxious to be free of the child welfare system, and often want nothing to do with it once they are discharged. States have tried various methods to encourage youth to return mail surveys or to come

back for follow-up interviews after discharge, including cash payments and gift certificates. Their success has generally been quite limited.

There are also significant variations in how this information is reported. Some States report on youth at 90 days after their participation in an independent living activity, such as a group life skills course. Some of these youth, therefore, may still be in the care of the State; they are not yet independent. Other States report on the results achieved 90 days after discharge from custody, regardless of when independent living services were provided or completed. Of the 11 States with whom we spoke, 4 started the clock at service completion, 6 at discharge (for one we were not able to determine this information). This timing issue can be further complicated in the case of 18-21 year-olds who return for assistance after their initial discharge.

In one State, the situation is even more complex. This State has instituted an option called "trial discharge," which allows youths to leave the system but retain the option of returning to State custody up to age 21 if they have problems. The results reported for youths during trial discharge, therefore, may not provide a useful picture of their ability to manage real independence.

We also noted a basic methodological problem in the reporting of this information. States report the *number of "results achieved"* (such as the number employed and the number holding a GED). In most reports, it is not possible to determine *the number of youth* for whom these results are being reported. For example, a State may report that 100 youths were employed and 100 youths graduated from high school; it is not possible to determine whether the population reporting equals 100 or 200 youths, or something in between.

18. Several State contacts also were concerned that independent living funds might be lost in the overall funding stream to the States, and be redirected by agency administrators to seemingly more urgent State priorities. They urged that funds remain a distinct stream.
19. The enabling legislation for the ILP requires States to submit an annual application for funds; legislative or regulatory change might be required to replace the application with a consolidated plan.
20. Goals and progress updates could be included in any planning and reporting framework ACF chooses; they could be set out in either free-standing independent living applications and reports or integrated child welfare plans and reports.

Although the current application and reporting requirements do not mandate that States establish specific goals and report on their progress in meeting them, some States have structured their submissions in this fashion.

21. The enabling legislation for the ILP requires States to submit an annual program report providing a description of their programs; any consolidation of reports may require legislative or regulatory change.
22. Such a document might require approval from the Office of Management and Budget.
23. 58 Fed. Reg. 67939, Dec. 22, 1993.

With respect to independent living, the SACWIS regulations require only that the systems be capable of identifying eligible youth.

24. Westat, Phase I, Vol., p. ix.
25. 58 Fed. Reg. 67913, December 22, 1993.

There would be certain limitations to the usefulness of AFCARS and SACWIS for the purposes of independent living; most importantly, they would not include youth formerly in foster care who return for independent living assistance. Information on such participants (who in most States represent a very small percentage of all youth served through the independent living grant) might have to be maintained separately.

26. Several of the State coordinators with whom we spoke voiced concerns about States that are currently unable to track specific services provided to youths. These critics were skeptical about programs that report that they are serving large numbers of youth by virtue of training to staff or foster parents that "trickles down," or who report that they serve everyone in the eligible age group "because that's the regulation."
27. As an example, one coordinator pointed out that her district-level administrators "were really nailing me to the wall about 'what are the minimum requirements that the feds lay on us.' And when I had to say they only require 90 days, then they said that's all they're going to do, the minimum. I argued and argued that you don't see much at 90 days, but it didn't matter. It was an issue of resources."
28. In 1990, a NILA data collection task force surveyed the States regarding their data collection activities. The group found that one of the most significant difficulties in interpreting the States' responses was the lack of common definitions of terms. This issue was also well recognized at the NILA annual meeting in March 1994.
29. While the requirements of the fiscal report are very limited, ACF can require more financial detail in its program reporting mechanisms. For example, both the Developmental Disabilities Program and the Social Services Block Grant require substantial budget detail.



30. In our discussions with State and regional staff, we suggested looking at the Federal-expenditures-per-youth as a measure of program extent and intensity; we received widely divergent reactions. Some staff argued that the figure was meaningless because it did not include additional State funds, did not take into account regional cost variations or varying levels of administrative costs for county- and State-run systems, and was not linked to program outcomes. Other contacts regarded the number as a very important insight, and suggested that it would prompt them to ask questions about the reasons for the variations among the States.
31. The Child Welfare League of America is currently engaged in an effort to identify core elements of independent living practice; ACF is represented on the project's advisory committee. These efforts might connect well with the ultimate development of performance measures.
32. By process areas we mean such things as the geographic extent of services, the training of staff, the length of programs, and so on. By interim outcomes we mean such things as youths' educational and employment status at the time of discharge. By final outcomes we mean such things as youths' education and employment status at points after discharge, while the youths are living independently.
33. Most State and regional contacts stressed the importance of educational attainment--including completion of high school, earning of a GED, or continuation to higher education--as a key measure. Similarly, the evaluation by Westat, Inc., determined that high school completion prior to discharge from custody "led to better outcomes, regardless of skills training" (Westat, Phase II, Vol I, p. xiii).
34. The ACF could take several additional steps to emphasize the importance of educational efforts. As suggested by the Child Welfare League of America, ACF could suggest amending current legislation to require that individual case plans "outline the steps being taken to help youths obtain a high school degree or its equivalent" (Child Welfare League of America, *Independent Living Services for Youths in Out-of-Home Care*, 1993, p. 51). Section 475 of the Social Security Act stipulates requirements for the case plans of children in substitute care. More broadly, ACF could require or encourage better coordination between independent living services and local educational systems.
35. States have created a variety of innovative means of measuring outcomes and program impact. These include exit interviews with youth, follow-up interviews, mail surveys, evaluations by youth of the services they have received, and efforts to determine if youth have developed meaningful relationships in their lives.

36. Many States treat independent living preparation as a discrete program, to which youths are referred by their primary case worker, and which lasts for a set period of time. In such programs, a youth might be referred for independent living training at age 16, complete the training by age 17, and remain in care for several more years--until age 18, 19, or even 21. The independent living program might have no further contact with this youth after completion of the training program. In these programs, therefore, required reporting on the status of youths at discharge would represent an important new source of information on the preparedness of these youths at the time they actually become independent, and would indeed give a longer-term picture of the youths than information at 90 days after the completion of services, as is now generally reported.
37. Millicent Abel, Ph.D., *et. al.*, *Evaluation of the Independent Living Program/ Initiative: Summary of Evaluation*, Urban Research Center, University of Louisville, March 13, 1990, p. 6.
38. One State, for example, is currently negotiating with criminal justice officials to get such information in aggregate form (through "blind matches"); they would not be able to track individual youth, but could see overall trends.
39. CWLA, *Independent Living Services*, p. 52.
40. For example, one regional office shares the application and report from each of the region's States with all of the other States in the region.

Although ACF produces an annual report to Congress that minimally summarizes State programs, officials in several States mentioned that they have not received this information. Aside from the sparse information contained in this report to Congress, ACF produces no national information on the program.

41. In addition, as noted above, the organizational structures of the regional offices vary with respect to youth services: In five regions, the Runaway and Homeless Youth (RHY) programs are administered by a different branch than the ILP. Such fragmentation may limit the ability of ACF program specialists to devote time to youth issues and to provide useful assistance to the States.
42. The National Resource Center for Youth Services (NRC) released a compilation of 34 State policies in 1993. The ACF has funded resource centers in various subject areas to provide technical assistance and support to State agencies and grantees receiving funds from ACF.
43. Depending on resource availability, ACF might be able to fund a national resource center for youth services for such a function.