oppaga
OFFICE OF PROGRAM POLICY ANALYSIS
& GOVERNMENT ACCOUNTABILITY

February 2007 Report No. 07-11

# Improved Fiscal and Quality Oversight Is Needed for the Independent Living Program

## *at a glance*

The Department of Children and Families needs to improve fiscal oversight of the Independent Living program to ensure that program resources are used as intended and in compliance with state and federal guidelines. For example, some Fiscal Year 2005-06 data indicates many lead agencies exceeded federal per-client spending limits; however, the department lacks the capability to determine whether this actually occurred. At the same time, some lead agencies did not spend all of the funds earmarked for the program, including federal funds. The department did not have accurate and timely information needed to detect that lead agencies were not spending program resources as intended, but has since made changes that should make this information more readily available.

The department lacks the information necessary to ensure lead agencies provide the statutorily mandated array of services to 13-17-year-olds. Department and lead agency oversight tools do not fully assess the services provided to this population and rarely assess the services provided to the 18 and older population. In addition, while the department has made some progress, it has not yet finished developing contractual standards and outcome measures for the Independent Living program as directed by the Legislature.

## Scope

As directed by the Legislature, this report examines the Independent Living program administered by the Department of Children and Families. Specifically, the report assesses whether the department provides effective oversight to ensure that lead agencies spend program funds as intended, and assess the quality and extent of Independent Living services.

## Background

During Fiscal Year 2005-06, 1,193 youth in Florida turned 18 while living in a foster home under the state's supervision. Long stays in foster care can hamper a youth's transition to adulthood, as most young adults learn the skills needed to live independently while they are growing up with their families. Some foster youth are raised in successive foster and group homes and they may not learn these critical skills before they reach the age of 18 and their traditional foster care services end.

To improve the ability of foster youth to transition to self-sufficiency, Congress passed the Foster Care Independence Act of 1999 (Public Law 106-169), which provides funding to states to improve services and expand eligibility for independent living services. Research shows that teaching independent living skills to foster youth at an early age can lead to more effective results. Foster youth ages 13-17 and former foster youth ages 18-23 are eligible for these services. Section 409.1451, *Florida Statutes,* implements the federal requirements and creates a continuum of services and financial assistance to prepare current and former foster youth to live independently (see Appendix A).

The Department of Children and Families provides these services through the Independent Living program. Private and county government-based child welfare organizations deliver Independent Living services in Florida through the community-based care system.[1] The department has 22 contracts with 20 community-based care lead agencies to provide child protective services, including Independent Living services, in the state's 67 counties.

- Lead agencies are to provide pre-independent living and life skills services to current foster youth ages 13-17 to help them obtain the skills and education needed to live independently after exiting the foster care system. Services include educational field trips, conferences, interviewing skills training, banking and budgeting skills training, and counseling. In addition, some 16-and 17-year-olds who demonstrate self-sufficiency skills may be chosen to participate in the Subsidized Independent Living program. Subsidized Independent Living allows youth to live independently of the daily care and supervision of an adult.
- Lead agencies are also to provide financial assistance and services to former foster youth age 18 and over through the Road to Independence program. The program provides cash awards of up to $892 per month for young adults finishing high school or enrolled full-time in postsecondary education. Young adults are also eligible to receive aftercare and transition funding to provide temporary financial support to prevent homelessness, assist with living expenses, and provide services to help the young adult develop a personal support system and achieve self-sufficiency.

As shown in Exhibit 1, 5,138 foster youth between the ages of 13 and 17 were under state care and eligible to receive pre-independent and life skills services as of June 30, 2006. However, as discussed later in this report, the department and lead agencies lack information on the extent to which youth in this age group actually receive services. OPPAGA analysis of department data shows that 122 youth ages 16 and 17 received Subsidized Independent Living services. Of the former foster youth age 18 and older, 2,497 received Road to Independence program, aftercare, and/or transition services. Appendix B provides more detailed information about services to older youth and young adults.

**Exhibit 1**
**Limited Data Available on Youth Ages 13-17; Almost 2,500 Former Foster Youth Received Services in Fiscal Year 2005-06**

| Independent Living Service | Fiscal Year 2005-06 Number Served | Fiscal Year 2005-06 Number Eligible |
|---|---|---|
| **Services for Youth Age 13-17** | | |
| Pre-Independent Living (ages 13-14) | Not Available | 1,755 |
| Life Skills Training (ages 15-17) | Not Available | 3,383 |
| Subsidized Independent Living (ages 16-17) | 122 | 2,335 |
| Total | Not Available | 5,138 [1] |
| **Services for Former Foster Youth Age 18+** | | |
| Road to Independence Program | 2,127 | 5,358 [2] |
| Transition | 1,179 | 5,128 |
| Aftercare | 500 | 5,672 |
| Total | 2,497 [3] | Not Available |

[1] The total number of youth eligible is an unduplicated count as of June 30, 2006.

[2] The numbers of former foster youth age 18 and over eligible for services are estimated based on the number of youth that aged out of care between 2001 and 2006 and the eligibility criteria for each service.

[3] The total number of youth age 18 and over served is an unduplicated count of former foster youth receiving Independent Living services. Some former foster youth received more than one service during Fiscal Year 2005-06.

Source: Department of Children and Families.

For Fiscal Year 2006-07, the Legislature appropriated $25.6 million to the Independent Living program. This amount comprises $9.7 million in federal funds from the John H. Chafee Foster Care Independence program and Education and Training Voucher funds, and $15.9 million in general revenue.

# Findings

Although the department recently made changes to better oversee Independent Living expenditures, it needs to further strengthen its oversight to ensure that staff use this information to monitor whether lead agencies spend program funds as intended. In addition, the department continues to lack the

[1] For more information on the implementation of community-based care in Florida, see *DCF Improves Readiness Assessment Process; However, Additional Changes Are Needed,* OPPAGA Report No. 04-65, September 2004 and *Child Welfare System Performance Mixed in First Year of Statewide Community-Based Care,* OPPAGA Report No. 06-50, June 2006.

information necessary to fully oversee and assess the quality and extent of Independent Living services.

## The department needs to more closely monitor expenditures of Independent Living funds

Budget management has been an ongoing problem for the Independent Living program. [2] In Fiscal Year 2005-06, some lead agencies did not use all program funds allocated, and the department has had limited ability to monitor how lead agencies were spending these funds. In addition, the department lacked the capability to determine whether lead agencies exceeded federal per-client spending limits for young adults. The department recently made changes that should make Independent Living expenditure information more readily available, and will need to use this information to monitor whether lead agencies spend their allocations within federal and state guidelines.

Lead agencies did not appropriately spend all Fiscal Year 2005-06 Independent Living funds. Expenditure data for Fiscal Year 2005-06 show that several lead agencies did not spend all of their allocated funding for Independent Living services. In response to a request from OPPAGA, department staff compiled information on lead agency Independent Living expenditures using invoices. These invoices showed that 12 lead agencies spent a total of $824,245 less than their allocation of state and federal funds for Independent Living in Fiscal Year 2005-06. [3] Department data does not show how lead agencies spent the state portion of these funds. Therefore, some lead agencies may have used general revenue funds allocated to the program for other child welfare services they deemed were higher priority.

Also, some lead agencies did not utilize all available federal Education and Training Voucher funds. Lead agencies receive federal Education and Training Vouchers to provide funds to young adults for the cost of attendance at a postsecondary institution. Expenditures per client may not exceed $5,000 per year or the total cost of attendance, whichever is less. As shown in Exhibit 2, the department has not expended over $1.8 million in Education and Training Voucher funds since 2002. Most recently, of this amount, lead agencies did not expend $361,851 from October 2004 through September 2006.

### Exhibit 2
### Since 2002, Over $1.8 Million in Federal Funds Were Not Expended for Independent Living Services

| Federal Grant Period | Education and Training Grant Award Amount | Federal Amount Not Used | Percentage Not Used |
|---|---|---|---|
| October 2002 – September 2004 | $2,527,929 | $ 930,794 | 36.8% |
| October 2003 – September 2005 | 2,696,572 | 590,495 | 21.9% |
| October 2004 – September 2006 | 2,695,964 | 361,851 | 13.4% |
| **Total** | **$9,233,456** | **$1,883,140** | **23.8%** |

Source: Department of Children and Families.

One lead agency that underspent voucher funds reported that it did not correctly bill eligible expenditures to Education and Training Voucher funds. According to department staff, a lack of education about the use of federal Education and Training Voucher funds may have resulted in lead agencies charging some eligible expenditures to other funding sources such as Chafee federal dollars.

At the same time, while some data indicates that more than half of the lead agencies exceeded federal per-client spending limits for Education and Training Voucher funds, the department lacks the capability to determine whether lead agencies actually exceeded these limits. OPPAGA analyzed payments made directly to clients for Independent Living services that the lead agencies recorded in the department's Integrated Child Welfare Services Information System (ICWSIS). For Fiscal Year 2005-06, we found that 14 of the 22 lead agencies exceeded the $5,000 per year cap for 225 of 769 young adults receiving Education and Training Voucher funds. In total, lead agencies recorded that $683,000 was spent in excess of the cap, representing 21.1% of the $3.2 million Education and Training Voucher budget.

Department managers contend that the database of payments made directly to clients does not reflect the final fund sources used to pay for Education and

[2] For example, in a 2005 review, the Auditor General found discrepancies in the department's financial data systems that resulted in unreliable information about the program's budget. See *Independent Living Transition Services Program - Operational Audit,* Auditor General Report No. 2005-119, February 2005.

[3] In addition, nine lead agencies overspent their Independent Living budgets by a total of $1,876,679. Lead agencies are responsible for managing their own Independent Living budgets. If they exceed their program budget allocation, they are required to make up the difference with other state funds or outside resources. Statewide, the difference between program expenditures and budget was $1,251,330.

Training Voucher services and should not be used to conclude that federal limits were exceeded. Managers stated that fund source information recorded by lead agencies in the department database does not necessarily correspond to the fund sources lead agencies used on invoices submitted to the department for reimbursement. Therefore, the department does not have the capability to determine whether lead agencies used state or federal funds for direct payments above $5,000 per year for youth receiving Education and Training Voucher funds.

Two main factors limited the department's ability to detect that lead agencies were not spending Independent Living funds as intended. First, the state's accounting system lacked accurate information on program expenditures during Fiscal Year 2005-06. This occurred, in part, because the department did not require lead agencies to submit finalized invoices detailing expenditure information prior to receiving contract payments during the year; instead, lead agencies were not required to submit detailed invoices until the end of the fiscal year. Lead agencies also submitted invoices charging expenditures to incorrect funding categories and failed to make adjustments by the end of the fiscal year. As a result, the department lacked accurate financial information, which made it difficult to effectively monitor lead agency Independent Living expenditures. The department was unable to determine how lead agencies used state general revenue allocated in their contracts for Independent Living.

Second, even when such information was available, the department did not use it to monitor lead agency expenditures. For example, the department did not routinely analyze Integrated Child Welfare Services Information System data to check whether lead agencies were exceeding the $5,000 per-child federal cap for Education and Training Vouchers. If the department had monitored the use of these funds, it could have taken corrective action to ensure that lead agencies spent the funds in accordance with state and federal law.

The department has recently made changes that will make Independent Living expenditure information more readily available, but it will need to ensure that staff use this information to monitor lead agencies. The department has made changes to its Fiscal Year 2006-07 contracts. First, lead agencies are now required to spend funds specified in their contracts for Independent Living services on the program and are not allowed to shift funds to other child welfare programs. Second, lead agencies are now required to submit invoices within 20 days at the end of each month in order to receive funding for the next month. Department staff report that under this new system, lead agencies may make adjustments to previously submitted invoices only to correct errors. As a result, the department should have more accurate and timely expenditure information.

However, to date, the department has not developed procedures to use this information to routinely monitor lead agency Independent Living expenditures. The department should develop procedures to track how lead agencies are spending the $5.1 million in general revenue funds the 2006 Legislature specifically allocated in proviso language for the Independent Living program in Fiscal Year 2006-07. This is particularly important in light of a recent rule change that establishes a goal for lead agencies to provide as many Independent Living services as possible using the funds allocated for this purpose. [4]

## *Lack of information hinders the department's ability to provide oversight and assess the quality and level of Independent Living services*

As noted in a prior OPPAGA report, the department has not adequately assessed the quality of Independent Living services or outcomes. [5] This continues to be a problem, as the department still lacks the information necessary to ensure lead agencies provide the statutorily mandated array of Independent Living services, and it has only limited information on services provided to 13-17-year-olds. In addition, the oversight tools used by department and lead agencies do not fully assess the services that are provided to 13-17-year-olds and generally do not assess services provided to the 18 and older population. Although directed to do so by the Legislature, the department has made limited progress on developing contractual standards and outcome measures for the Independent Living program.

[4] Rule 65C-31.011, *F.A.C.,* July 27, 2006.

[5] For more information, see *Improvements in Independent Living Services Will Better Assist State's Struggling Youth,* OPPAGA Report No. 05-61, December 2005.

The department has limited data on the extent to which lead agencies provide services to 13-17-year-olds. Although the *Florida Statutes* require the department and lead agencies to provide an array of Independent Living services for foster youth ages 13-17, the extent to which these youth actually receive these services is unknown because of limitations in the department's and lead agencies' data systems. [6] Lead agencies determine the specific services to be provided to each youth using a needs assessment tool that assesses which services would provide the most benefit to each youth. [7] The department's data system identifies the number of 13-17-year-olds in licensed foster care who are eligible for Independent Living services, but the system does not track the number of youth who receive these services or what services are provided.

The lead agencies do not consistently identify the number and percentage of eligible 13-17-year-old foster youth that receive Independent Living services. We surveyed the 22 lead agencies to determine how many 13-17-year-old foster youth received Independent Living services during Fiscal Year 2005-06. Two lead agencies were not able to report the number of youth served because they were making changes in their data systems. The remaining lead agencies used varied methodologies to calculate the number of youth that received these services. Some were able to report only a duplicated count or the average number of youth served each month, resulting in data that were incongruent with the number of eligible youth in their caseloads. [8] As a result, neither the department nor the lead agencies can readily determine if foster youth receive the required Independent Living services. This also hinders the department and lead agencies' ability to accurately determine budget needs for serving this population.

Stakeholders and lead agencies report problems in serving all eligible youth ages 13-17. These stakeholders, including foster youth, child advocates, and guardians ad litem, report that the program is not serving all eligible youth ages 13-17 and that some lead agencies are not providing all required services to meet the assessed needs of these foster youth. Some lead agencies also stated that not all eligible youth receive life skills training due to barriers in serving them. For example, lead agencies reported that lack of transportation can prevent youth from attending Independent Living services, and that younger teenage youth often do not realize the importance of attending life skills classes that help prepare them for independence several years in the future. Some lead agencies have tried to address these barriers by providing transportation to Independent Living services and providing incentives to foster parents to work on life skills with foster youth in the home.

Department and lead agency oversight tools do not collect the information necessary to determine whether lead agencies provide quality services and meet statutory requirements. Quality assurance and contract monitoring are important aspects of Independent Living oversight. Quality assurance reviews provide the department and lead agencies with information about the quality of services being provided to children and their families. These reviews are also intended to evaluate whether clients receive services that best meet their needs. Annual contract monitoring reviews evaluate lead agencies' compliance with federal and state laws, rules, policies, and contract provisions. [9]

The department's quality assurance system assigns responsibility to the lead agencies to perform quality assurance reviews of child welfare programs. [10] To carry out this responsibility, each of the 22 lead agencies must develop a quality assurance data collection tool to obtain information from case files to evaluate the quality of programs provided by the lead agency or its subcontractors.

We found the lead agencies' quality assurance data collection tools focus on compliance rather than service quality for the Independent Living program.

---

[6] These services include educational field trips, conferences, and life skills services such as budget management, educational support, and employment training.

[7] Youth receive assessments multiple times throughout their stay in foster care.

[8] For example, some lead agencies used the number of times a youth attended life skills classes as the client count, resulting in an overstatement of the number of youth served.

[9] Contract monitors are department staff located in six contract oversight units throughout the state and supervised by the central office.

[10] The department uses a three-tiered process for quality assurance in which lead agency and central office staff have responsibilities. Lead agencies are responsible for Tier 1 quality assurance activities, including developing and implementing a Quality Management Plan for reviewing in-house and subcontracted services. Lead agencies also must develop the necessary instruments or choose from existing department-approved instruments. Department staff located in the department's zones and central office are responsible for Tiers 2 and 3 quality assurance activities. These staff approve lead agency plans, validate lead agency monitoring, provide technical assistance, and ensure the state is prepared for federal reviews.

Our analysis of the quality assurance tools developed by each lead agency found that the tools generally addressed program requirements such as whether the lead agency had completed a needs assessment for each youth and whether case managers developed an independent living plan as a result of this assessment. The tools also addressed whether services provided to youth were consistent with the needs outlined in the youth's independent living plans.

However, the tools do not evaluate the outcomes of Independent Living services by assessing whether youth and young adults gained skills they can use to achieve self-sufficiency. For example, the department and lead agencies are not assessing whether youth who receive life skills training improve in areas such as budget management, education, and employment. Thus if a youth's needs assessment identifies educational deficiencies, the quality assurance tools would evaluate whether the youth was provided with services such as tutoring, but would not assess whether the youth achieved satisfactory educational progress.

Also, most lead agencies use quality assurance tools that do not assess services provided to young adults age 18 and over; only two of the 22 lead agencies have tools that address the services provided to young adults. Moreover, these two tools are limited in their assessment because they only addressed whether young adults age 18 and older received the transitional services they requested. The tools do not address the Road to Independence program or aftercare services. Since the majority of program funding is dedicated to this population, it is important for the department and lead agencies to evaluate whether young adults are benefiting from the services they receive. For example, the department needs to determine whether young adults receiving job training services subsequently obtain employment or graduate from postsecondary or vocational programs.

The department's contract monitoring reviews also do not examine key elements of the Independent Living program. During contract monitoring reviews, department staff examine lead agency activities to determine if they have met contractual requirements. However, for Independent Living, the reviews primarily focus on whether lead agencies accurately determined eligibility for Road to Independence program recipients age 18 and older. The reviews do not address whether youth receiving aftercare and transition services meet eligibility requirements for those services, or whether lead agencies comply with federal and state laws, rules, policies, and contract provisions regarding Independent Living services for youth ages 13-17. Department managers said that contract monitoring reviews used to more broadly review Independent Living services, but were reduced in scope in order to not duplicate other monitoring tools.

The department has not finished developing contractual standards and outcome measures for Independent Living services, but has made some progress. The 2006 Legislature required the department to incorporate minimum Independent Living standards into lead agency contracts by Fiscal Year 2007-08. The Legislature also required the department to develop Independent Living outcome measures to provide information on the effectiveness of Independent Living services by Fiscal Year 2007-08. The Legislature mandated that the department begin monitoring lead agency performance in accordance with these requirements by Fiscal Year 2008-09. [11]

The department has made limited progress on developing minimum standards. The department began to develop minimum standards in December 2006 using the standards recommended in a prior OPPAGA report, which proposed standards for the areas of life skills, housing, education, employment, health, aftercare and transitional services, training, and data collection and evaluation to ensure services are consistent in content and quality throughout the state. [12] The department plans to solicit lead agency input on the standards and how they are incorporated into the contracts.

The department has made some progress on developing outcome measures for the program. As discussed earlier, lead agency quality assurance data collection tools do not collect information to determine if program services are effective in providing youth with the skills they need to achieve self-sufficiency. Department administrators have participated in a national workgroup and discussed potential measures with the Florida Independent Living Advisory Council. The department is also

[11] Chapter 2006-25, *Laws of Florida.*

[12] *Independent Living Minimum Standards Recommended for Children in Foster Care*, OPPAGA Report No. 04-78, November 2004.

working with the Department of Education to obtain data for two measures: the percentage of youth that age out of foster care with a high school diploma or GED, and the percentage who are working or who are in postsecondary education. However, the department has not finalized an interagency agreement with the Department of Education and, as a result, has not collected data for these measures.

Further, these two measures do not fully assess the effectiveness of Independent Living services. For example, these measures do not address outcomes related to housing, transportation, and physical and mental health. In addition, the current measures combine too much information into single measures. Currently, the department includes employment and postsecondary education outcomes together making it impossible to determine what percentage of young adults are working versus attending postsecondary institutions. Department staff reported that they plan to determine the feasibility of establishing more specific outcome measures when they receive the data from the Department of Education.

# Recommendations

To improve budget management and program oversight of the Independent Living program, we recommend that the Department of Children and Families take the actions discussed below.

- To maintain better information on the recipients and costs associated with the program, the department should implement procedures to routinely track the number of youth and young adults receiving each Independent Living service and the associated state and federal expenditures.
- To ensure that Education and Training Voucher funds are spent in compliance with federal law, the department should develop a process to track the amount and fund sources that lead agencies use for payments made directly to young adults. For example, the department should require lead agencies to accurately record information on payments in the Integrated Child Welfare Services Information System (ICWSIS). Also, the department should require lead agencies to reconcile information on Independent Living expenditures from the information system with the invoices submitted to the department for reimbursement.
- To help ensure lead agencies follow state and federal budgetary guidelines for the Independent Living program, the department should enhance its guidance and training. For example, the department should provide ongoing training to lead agencies about federal requirements and charging Independent Living expenses to appropriate funding sources.
- To better monitor whether 13-17-year-old foster youth are receiving life skills training as required, the department should contractually require lead agencies to standardize and report data on the unduplicated number of youth receiving services and the types of services they receive.
- To better gauge the quality of Independent Living services, the department should require lead agencies to include outcome information in their quality assurance data collection tools, such as whether young adults who receive job training subsequently obtain employment.
- To improve contract monitoring of the Independent Living program, the department should revise its contract monitoring tool to assess lead agency compliance with Independent Living statutes and rules for the 13-17-year-old population and recipients of aftercare and transition services.
- The department should develop minimum standards for the program and incorporate these standards into Fiscal Year 2007-08 lead agency contracts.
- The department should also improve outcome measurements for the program by ensuring that data collected can provide meaningful information about the effectiveness of Independent Living services. The department should improve its current measures to differentiate employment and education outcomes, and establish additional measures to determine outcomes related to housing, transportation, and physical and mental health.

# Agency Response

In accordance with the provisions of s. 11.51(5), *Florida Statutes,* a draft of our report was submitted to the Secretary of the Department of Children and Families for review and response. The Secretary's written response to this report is in Appendix C.

## Appendix A

# Florida Law Requires Independent Living Services for Foster Youth

Pursuant to s. 409.1671, *Florida Statutes,* child welfare program services are provided by community-based care lead agencies. The lead agencies must offer current and former foster youth a continuum of Independent Living services and financial assistance as described in the table below.

| Service | Eligibility | Description |
|---|---|---|
| Pre-independent living services | All 13-and 14-year-olds in foster care | ▪ Life skills training<br>▪ Educational field trips<br>▪ Conferences |
| Life skills services | All 15-and 17-year-olds in foster care | ▪ Banking and budgeting skills<br>▪ Interviewing skills<br>▪ Parenting skills<br>▪ Time management and organizational skills<br>▪ Educational support<br>▪ Employment training<br>▪ Counseling |
| Subsidized independent living services | Some 16-and 17-year-olds chosen by the department as being able to demonstrate independent living skills | Arrangements that allow a child to live independently of the daily care and supervision of an adult. |
| Aftercare support services | Youth ages 18-22, inclusively, who have been in foster care, meet certain conditions, and are determined eligible by the department. Temporary assistance provided to prevent homelessness. The amount provided is based on funds available. | Services to assist young adults who were formerly in foster care to continue to develop the skills and abilities necessary for independent living.<br>▪ Mentoring and tutoring<br>▪ Mental health services and substance abuse counseling<br>▪ Life skills classes, including credit management and preventive health activities<br>▪ Parenting classes<br>▪ Job and career skills training<br>▪ Counselor consultations<br>▪ Temporary financial assistance<br>▪ Financial literacy skills training |
| Road to Independence Scholarship | Youth ages 18-20 (initial award)<br>Under 23 (renewal awards)<br>Must meet one of the following criteria: (1) earned a high school diploma or its equivalent and has been admitted for full-time enrollment in an eligible postsecondary education institution; (2) enrolled full-time in an accredited high school; (3) is enrolled full-time in an accredited adult education program designed to provide the student with a high school diploma or its equivalent. | Financial assistance to help former foster children to receive the educational and vocational training needed to achieve independence.<br>Amount of award based on the living and educational needs of the young adult and may be up to, but shall not exceed, the amount of earnings that the student would have been eligible to earn working a 40-hour-a-week federal minimum wage job. |
| Transitional support services | Youth ages 18-22, inclusively, who have been in foster care, and demonstrate that the services are critical to the young adult's own efforts to develop a personal support system and achieve self-sufficiency. | Other appropriate short-term services, which may include<br>▪ Financial<br>▪ Housing<br>▪ Counseling<br>▪ Employment<br>▪ Education<br>▪ Mental health<br>▪ Disability<br>▪ Other services, if the young adult demonstrates that the services are "critical" to achieve self-sufficiency. |

Source: Section 409.1451, *Florida Statutes.*

## *Appendix B*

# Analysis of Independent Living Services Provided to Young Adults Age 18 and Older

OPPAGA analyzed Independent Living payments made to 2,559 young adults totaling $16.3 million in Fiscal Year 2005-06. Independent Living payments included in this analysis include Road to Independence, Aftercare Support Services, and Transition Support Services paid to young adults between ages 18 and 22, inclusive, as well as Subsidized Independent Living payments to youth age 16 and 17.

Our analysis found that the majority of young adults served and the majority of program expenditures paid to young adults were for the Road to Independence program (see Table B-1).

### Table B-1
### The Majority of Fiscal Year 2005-06 Program Expenditures Paid to Young Adults Is for the Road to Independence Program

| | Road to Independence Program | Aftercare Services | Transition Services | Subsidized Independent Living | Any Young Adult Service |
|---|---|---|---|---|---|
| Number of Young Adults | 2,127 | 500 | 1,179 | 122 | 2,559 [1] |
| Program Expenditures Paid to Young Adults | $13,344,109.53 | $474,896.76 | $2,191,565.16 | $283,665.52 | $16,294,236.97 |
| Percentage of Program Expenditures Paid to Young Adults | 82% | 3% | 13% | 2% | 100% |

[1] This is an unduplicated count of young adults receiving Independent Living services. Some young adults received more than one service during Fiscal Year 2005-06.

Source: Department of Children and Families.

Most recipients of aftercare and transition services also received Road to Independence program funds at some point during the fiscal year. As a result, services to young adults not participating in the Road to Independence program are more limited (see Table B-2).

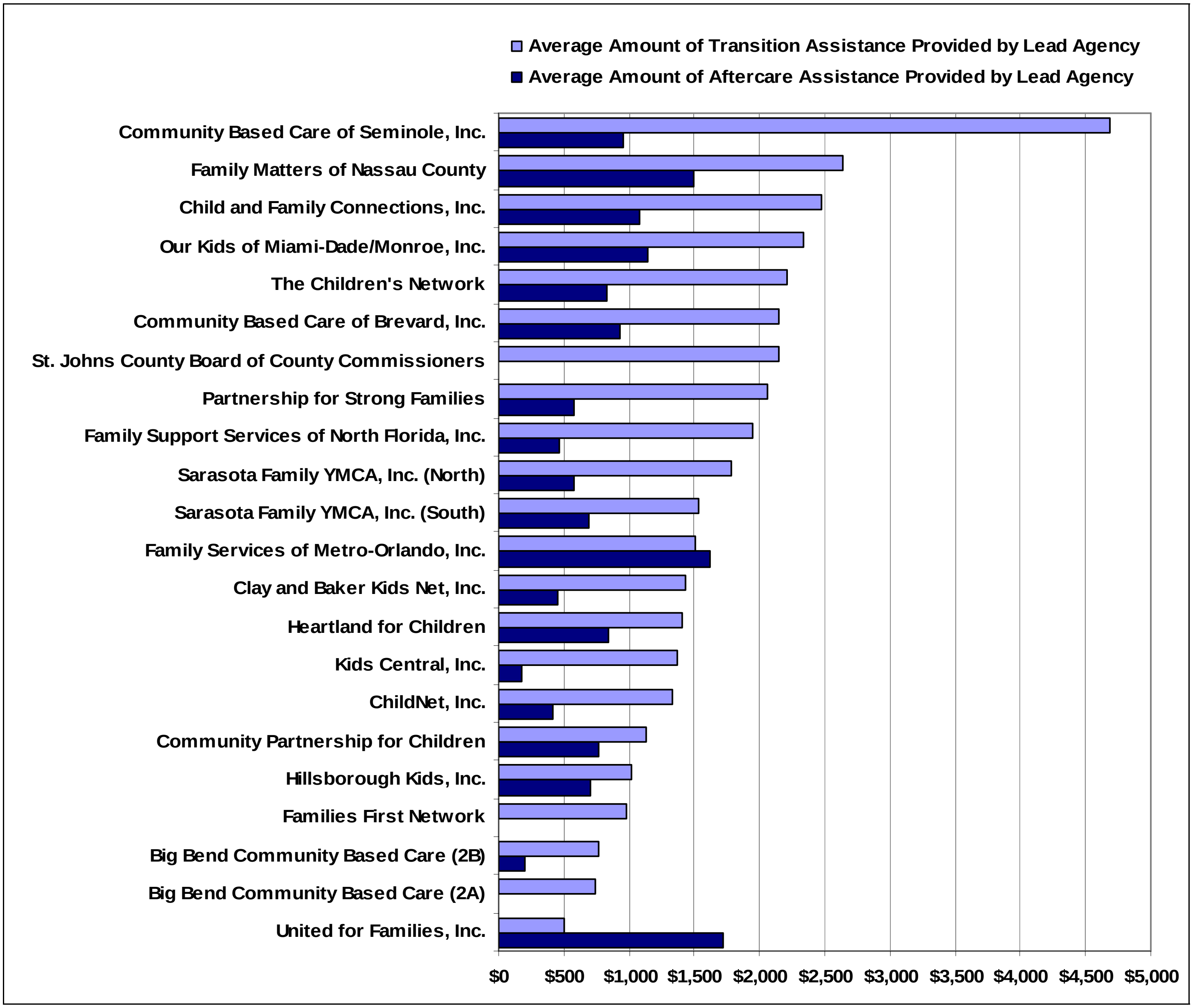
### Table B-2
### Amount of Aftercare and Transition Services Provided to Young Adults Not Participating in the Road to Independence Program Was Limited in Fiscal Year 2005-06

| | Aftercare Services | | Transition Services | |
|---|---|---|---|---|
| | Number of Youth Served | Dollar Amount Expended | Number of Youth Served | Dollar Amount Expended |
| Young Adults Participating in Road to Independence Program | 395 | $384,811.12 | 839 | $1,305,793.56 |
| Young Adults Not Participating in Road to Independence Program | 105 | 90,085.64 | 340 | 885,771.60 |

Source: Department of Children and Families Integrated Child Welfare Services Information System data.

Lead agency expenditures for aftercare and transition services varied widely during Fiscal Year 2005-06. As shown in Table B-3 the average amounts paid per recipient for services provided ranged from $0 to $1,721 for aftercare services and $503 and $4,680 for transition services.

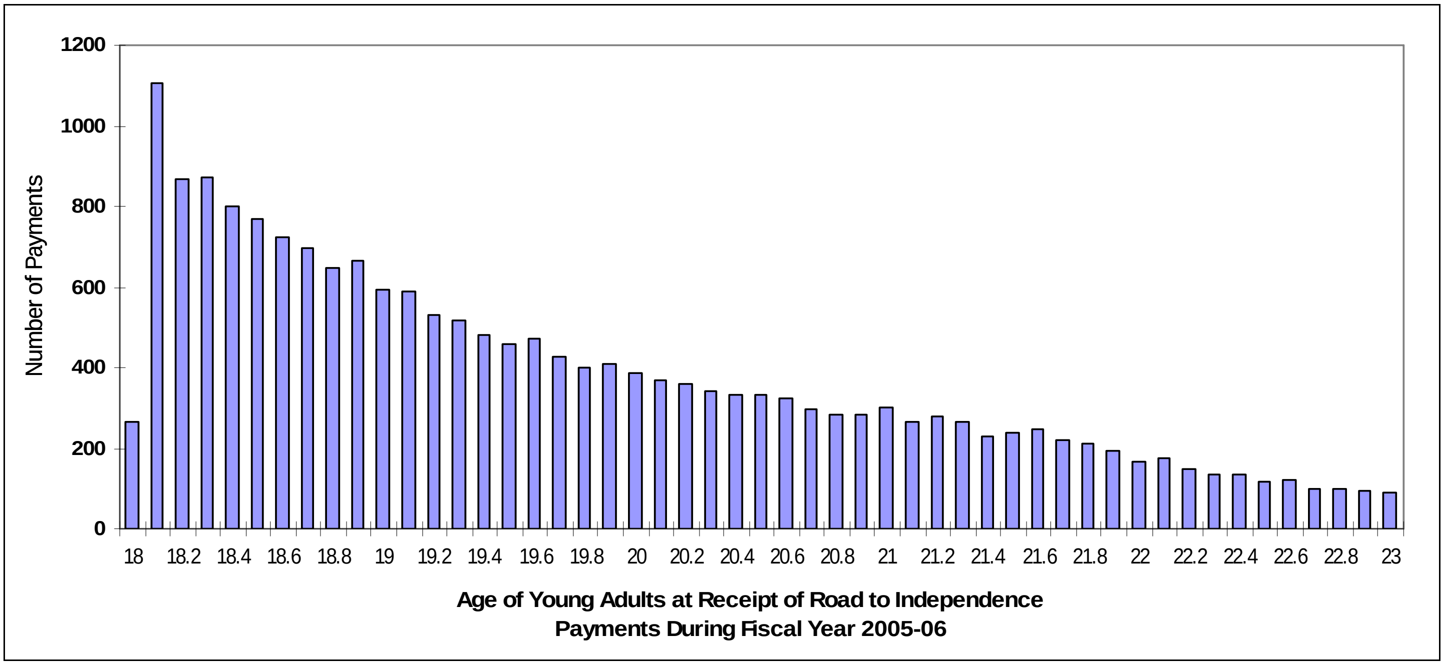
## Table B-3
## The Average Amount of Aftercare and Transition Assistance Provided to Young Adults Varied Widely by Lead Agency in Fiscal Year 2005-06




Source: Department of Children and Families Integrated Child Welfare Services Information System data.

Our analysis also found that participation in the Road to Independence program declines as young adults age, which may mean that some young adults are not completing their educational goals (see Table B-4). However, data are not available to determine the extent to which young adults are completing educational goals such as finishing high school, or receiving two-year or four-year postsecondary degrees.

### Table B-4
### Older Participants in the Road to Independence Program Received Fewer Payments in Fiscal Year 2005-06




Source: Department of Children and Families Integrated Child Welfare Services Information System data.

# Appendix C

**State of Florida**
**Department of Children and Families**

**Charlie Crist**
*Governor*

**Robert A. Butterworth**
*Secretary*

February 13, 2007

Gary R. VanLandingham
Director
The Florida Legislature
Office of Program Policy Analysis and
Government Accountability
111 West Madison Street
Room 312 Claude Pepper Building
Tallahassee, Florida 32399-1475

Dear Mr. VanLandingham:

Thank you for your January 18, 2007, letter providing the preliminary findings and conclusions of OPPAGA's report: Improved Fiscal and Quality Oversight is Needed for the Independent Living Program.

Enclosed is the Department's response to the findings and recommendations. If you or your staff have any questions, please contact Patricia A. Badland, Director of the Office of Family Safety, at 850-488-8762.

We appreciate the opportunity to respond and look forward to continued collaboration with your office.

Sincerely,

Robert A. Butterworth
Secretary

Enclosure

1317 Winewood Boulevard, Tallahassee, Florida 32399-0700

Mission: Protect the Vulnerable, Promote Strong and Economically Self-Sufficient Families, and Advance Personal and Family Recovery and Resiliency

FLORIDA DEPARTMENT OF CHILDREN AND FAMILIES
RESPONSE TO OFFICE OF PROGRAM POLICY ANALYSIS AND GOVERNMENT ACCOUNTABILITY OFFICE REPORT: Improved Fiscal and Quality Oversight Is Needed for the Independent Living Program
February 2007

**Recommendation # 1:** The Department should implement procedures to routinely track the number of youth and young adults receiving each independent living service and the associated state and federal expenditure.

**Department's Response:** While the Department does have procedures to track services provided to 18 – 23 year olds (as described in the following paragraph), we concur with the recommendation with regard to the 13 – 17 year old population. In addition, we concur with the recommendation of the need to better track the available data against State and Federal funds sources, as described in Recommendation #2.

For services delivered to young adults formerly in foster care, the Department currently has a data system, the Integrated Child Welfare Services System (ICWSIS), which records direct payments or individual expenditures made to young adults. This system provides a record and tracks payments made to each young adult by age served by each community-based care lead agency for the services specified in 409.1451(5), F. S. The community-based care lead agencies are required to maintain this data system. The Department will use the data system, ICWSIS, to accomplish this recommendation and recommendation #2.

For services delivered to children age 13 through 17 in foster care, the Department will implement the federally mandated database for tracking service delivery. The Department of Health and Human Services issued a proposed rule on July 14, 2006 regarding the Chafee National Youth in Transition Database. It has two functions: 1) to track the independent living services states provide to youth; and 2) to develop outcome measures that may be used to assess state performance in operating their independent living programs. When the final rule is adopted by the Department of Health and Human Services Administration for Children and Families, the community-based care lead agency contract template will include this requirement. The federal Foster Care Independence Act of 1999 requires the database to track the number and characteristics of children receiving services and the type and quantity of services. Once the database is implemented, the Department will explore means for tracking associated expenditures with the services.

**Recommendation # 2:** The Department should develop a process to track the amount and fund sources that lead agencies use for payments made directly to young adults.

**Department's Response:** The Department concurs with this recommendation. While the Department does have the information necessary to perform this process, it has been utilized informally and not very consistently.

Currently, the Department requires the community-based care lead agency invoices to be reconciled with data from the Integrated Child Welfare Services System (ICWSIS). To ensure accuracy, training will be provided to the Department's contract managers to ensure the community-based care lead agency invoices reconcile with ICWSIS before the invoices are approved for payment by the Department. In addition, the Department will analyze the reconciliation process to ensure regulations regarding fund sources are met. The

FLORIDA DEPARTMENT OF CHILDREN AND FAMILIES
RESPONSE TO OFFICE OF PROGRAM POLICY ANALYSIS AND GOVERNMENT ACCOUNTABILITY OFFICE REPORT: Improved Fiscal and Quality Oversight Is Needed for the Independent Living Program
February 2007

Department will use the data provided in ICWSIS regarding direct payments made for young adult services (described in Recommendation # 1) to track fund sources to ensure the Chafee Educational and Training Voucher federal funds do not exceed the $5,000 limit per young adult.

In addition, the Department has recently formed a special unit that will centralize and concentrate the accounting for all community-based care expenditures, including the independent living program. This unit is tasked with reconciling community-based care lead agency actual expenditure reports and budget amendments to improve the quality and reliability of the information for both management and federal reporting purposes. The unit is expected to be current with reconciliation activities by the end of the 2006-07 fiscal year.

**Recommendation # 3:** The Department should enhance its guidance and training (re: state and federal budgetary guidelines).

**Department Response:** The Department concurs with this recommendation. The Department has provided a significant amount of training to CBC providers in recent months as a result of the implementation of the IV-E waiver effective October 1, 2006. The Department will continue to provide this training at every available opportunity and is committed to providing training for contract managers and community-based care providers to ensure that they are sufficiently trained to properly administer the programmatic and budgetary constraints of all applicable programs. The next training event for independent living coordinators is scheduled for late February 2007.

**Recommendation # 4:** The Department should contractually require lead agencies to standardize and report data on the unduplicated number of youth receiving services and the types of services they receive.

**Department's Response:** The Department concurs with this recommendation. The Department will implement the Chafee National Youth in Transition Database to accomplish this objective. This database will be a requirement of the community-based care lead agency contract template. In addition, the Independent Living Services Advisory Council has proposed outcomes and indicators in their 2005 and 2006 Annual Reports to the Legislature and the Department. These outcomes and indicators include service delivery data elements. The Department has committed to implementing these outcomes and indicators as resources permit.

**Recommendation # 5:** The Department should require lead agencies to include outcome information in their quality assurance data collection tools.

**Department's Response:** The Department concurs with this recommendation. The Department will implement the Chafee National Youth in Transition Database to accomplish this objective. This database will be a requirement of the community-based care lead agency contract template.

FLORIDA DEPARTMENT OF CHILDREN AND FAMILIES
RESPONSE TO OFFICE OF PROGRAM POLICY ANALYSIS AND GOVERNMENT ACCOUNTABILITY OFFICE REPORT: Improved Fiscal and Quality Oversight Is Needed for the Independent Living Program
February 2007

The federally proposed National Youth in Transition Database outcome measures are:
Outcome 1: Increase young people's financial self-sufficiency.
Outcome 2: Improve young people's educational (academic or vocational) attainment.
Outcome 3: Increase young people's positive connections with adults.
Outcome 4: Reduce homelessness among young adults.
Outcome 5: Reduce high-risk behavior among young people.
Outcome 6: Improve young people's access to health insurance.

In addition, quality assurance tools based on the requirements of Section 409.1451, F. S. specifying the service array and eligibility requirements for children age 13 through 17 and young adults age 18 through 22 have been developed. These tools are under review at this time. The anticipated implementation date is Spring-Summer 2007.

**Recommendation # 6:** The Department should revise its contract monitoring tool to assess lead agency compliance with independent living statutes and rules for the 13-17 year old population and recipients of aftercare and transition services.

**Department's Response:** The Department concurs with this recommendation. The Department will create and/or revise its tools to include eligibility and compliance items for all independent living areas as recommended. The subcontract tool will be revised to assess whether or not the lead agency is monitoring its subcontractors for independent living eligibility and compliance, when applicable. The anticipated completion date is April 2007.

**Recommendation # 7:** The Department should develop minimum standards for the program and incorporate these standards into FY 2007-08 lead agency contracts.

**Department's Response:** The Department concurs with this recommendation. As required by proviso language enacted by the 2006 Legislature, the Department is revising the lead agency contract template to include minimum standards for current and former foster youth. The template will be effective July 1, 2007. The standards will be consistent with the standards proposed in the Office of Program Policy and Analysis and Government Accountability (OPPAGA) Report Number 04-78.

A brief summary of the standards from the OPPAGA Report 04-78 follows:
Life Skills Minimum Standards
Housing Minimum Standards
Education Minimum Standards
Employment Minimum Standards
Health Minimum Standards
Aftercare and Transitional Services Minimum Standards
Training Minimum Standards

*The Florida Legislature*

# *Office of Program Policy Analysis and Government Accountability*

OPPAGA provides performance and accountability information about Florida government in several ways.

- OPPAGA publications and contracted reviews deliver program evaluation, policy analysis, and justification reviews of state programs to assist the Legislature in overseeing government operations, developing policy choices, and making Florida government better, faster, and cheaper.
- Florida Government Accountability Report (FGAR) is an Internet encyclopedia, www.oppaga.state.fl.us/government, that provides descriptive, evaluative, and performance information on more than 200 Florida state government programs.
- Florida Monitor Weekly, an electronic newsletter, delivers brief announcements of research reports, conferences, and other resources of interest for Florida's policy research and program evaluation community.
- Visit OPPAGA's website, the Florida Monitor, at www.oppaga.state.fl.us

OPPAGA supports the Florida Legislature by providing evaluative research and objective analyses to promote government accountability and the efficient and effective use of public resources. This project was conducted in accordance with applicable evaluation standards. Copies of this report in print or alternate accessible format may be obtained by telephone (850/488-0021 or 800/531-2477), by FAX (850/487-3804), in person, or by mail (OPPAGA Report Production, Claude Pepper Building, Room 312, 111 W. Madison St., Tallahassee, FL 32399-1475). Cover photo by Mark Foley.

Project supervised by Nancy Dufoe (850/487-9242)

Project conducted by Claire Mazur (850/487-9211), LeNée Carroll (850/488-9232) and Bill Zepernick (850/487-9267)

Becky Vickers, Staff Director (850/487-1316)

Gary R. VanLandingham, Ph. D., OPPAGA Director