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DCF Has Improved Some Aspects of Independent Living Program Oversight; Other Long-Standing Problems Remain

at a glance

The Department of Children and Families has improved its fiscal oversight of lead agency Independent Living expenditures for young adults age 18 and older to help ensure that federal funds for this age group are spent in compliance with federal law. The department also has broadened its contract monitoring and quality assurance systems to better address key elements of the Independent Living Program.

However, the department continues to lack an effective mechanism to track whether 13- to 17-year-old youth receive services as directed by law. The department also is not routinely monitoring whether lead agencies meet minimum contract standards for services and has not met statutory requirements to establish program outcome measures.

Scope

In accordance with state law, this progress report informs the Legislature of actions taken by the Department of Children and Families (DCF) in response to a 2007 OPPAGA report.^{1,2} This report presents our assessment of the extent to which the

department has addressed the findings and recommendations included in our report.

Background

As provided by s. 409.1451, *Florida Statutes*, the Independent Living Program provides services and financial assistance to prepare current and former foster youth to live independently. 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.

The department contracts with community-based care lead agencies to provide child protective services, including independent living services, in the state's 67 counties. All 13- to 17-year-old foster youth and some 18- to 22-year-old former foster youth are eligible for services. The program provides six categories of services.

- All 13- to 14-year-old foster youth are eligible to receive **pre-independent living** services which include life skills training, educational field trips, and conferences.
- All 15- to 17-year-old foster youth are eligible to receive **life skills services** which include banking and budgeting skills, educational support, and employment training.

¹ Section 11.51(6), *F.S.*

² *Improved Fiscal and Quality Oversight Is Needed for the Independent Living Program*, OPPAGA [Report No. 07-11](#), February 2007.

- Some 16- and 17-year-old youth who demonstrate self-sufficiency skills may be chosen to participate in the **Subsidized Independent Living program**. This program allows youth to live independently of the daily care and supervision of an adult.
- Road to Independence scholarships** provide eligible 18- to 22-year-old young adults with financial assistance up to \$1,256 per month for educational and vocational training.³
- Aftercare services** provide services to eligible 18- to 22-year-old young adults so that they can continue to develop the skills and abilities necessary for independent living including tutoring, counseling, and skills training.
- Transition services** provide eligible 18- to 22-year-old young adults with short-term services including financial, housing, counseling, and employment.

As shown in Exhibit 1, there were 4,055 youth aged 13 to 17 eligible to receive pre-independent living and life skills services as of June 30, 2009. However, as discussed later in this report, the department and lead agencies lack information on the extent to which youth in this age group receive services. Of the young adults age 18 and older, 4,333 received Road to Independence program, aftercare, and transition services.

For Fiscal Year 2009-10, the Legislature appropriated \$35.3 million to the Independent Living Program. This includes \$9 million in federal funds from the John H. Chafee Foster Care Independence program and Education and Training Voucher funds, and \$26 million in general revenue.

Exhibit 1

Limited Data Available on 13- to 17-Year-Old Youth; 4,333 Young Adults Received Services in Fiscal Year 2008-09

Independent Living Services for 13- to 17- Year-Old Youth	Number Served	Number Eligible
Pre-Independent Living (ages 13-14)	Not Available	1,101
Life Skills (ages 15-17)	Not Available	2,954
Subsidized Independent Living (ages 16-17)	246	2,205
Total	Not Available	4,055¹
Independent Living Services for 18- to 22- Year-Old Young Adults	Number Served	Number Eligible ²
Road to Independence	3,004 ³	5,729
Transition	1,722	5,298
Aftercare	985	5,735
Total	4,333⁴	Not Available

¹ The total number of youth eligible is an unduplicated count as of June 30, 2009.

² The numbers of former foster youth age 18 and over eligible for each service are estimated based on the number of youth who aged out of foster care between 2004 and 2009 and the eligibility criteria for each service. Young adults may be eligible for more than one type of service.

³ In June 2009, approximately 45% of Road to Independence program recipients received the full stipend award of \$1,135 per month.

⁴ The total number of young adults age 18 and over served is an unduplicated count of former foster youth receiving independent living services. Some young adults received more than one type of service during Fiscal Year 2008-09.

Source: Department of Children and Families.

At the direction of the Legislature, OPPAGA reviewed the Independent Living Program in 2007 and concluded that DCF needed to improve its fiscal oversight to ensure that program resources were used as intended and in compliance with state and federal guidelines. DCF also lacked the information necessary to ensure lead agencies provided statutorily mandated services to 13- to 17-year-old youth in foster care.

³ In July 2009, the department increased the maximum monthly payment from \$1,135 to \$1,256 due to an increase in the federal minimum wage.

Current Status

The department has implemented our 2007 recommendations to better oversee Independent Living Program expenditures for young adults age 18 and over and better ensure that state and federal funds for this age group are spent in compliance with federal law. In addition, the department has implemented our recommendations to broaden the scope of its contract monitoring and quality assurance systems.

However, the department continues to lack an effective mechanism to track whether 13- to 17-year-old youth receive services. The department also does not routinely monitor whether lead agencies meet standards for independent living services, and it has not established an effective mechanism to hold lead agencies accountable for program outcomes.

DCF has improved fiscal oversight of the Independent Living program

The department provided lead agencies with guidance on program budgetary requirements and recently began to more routinely monitor whether lead agencies exceed federal spending limits. The department also created a fiscal monitoring unit to track and analyze lead agency expenditures.

The department has provided lead agencies with guidance on state and federal budgetary requirements for the Independent Living Program. Our 2007 report noted that some lead agencies had not used all of their available federal Education and Training Voucher funds and had charged eligible expenditures to other funding sources, and we recommended that DCF provide more guidance to lead agencies on proper use of program funds.

Consistent with our recommendation, DCF has adopted a manual for lead agency budget

staff that provides budgetary guidelines for state and federal program funds and serves as a guide for coding payments correctly within the department's data system. Lead agencies have subsequently expended all federal Education and Training Voucher funds received since Federal Fiscal Year 2006-07 and have reduced the frequency of coding violations for voucher funds.⁴

The department has recently implemented a process to more routinely monitor federal per-client spending limits for Education and Training Voucher funds. Our prior report noted that the department lacked the capability to determine whether lead agencies exceeded federal Education and Training Voucher fund limits; some data indicated that more than half of the lead agencies had exceeded per-client spending limits. To ensure that funds are spent appropriately, we recommended that the department better track the amount and fund sources lead agencies use for payments to young adults.

To address this problem, DCF began to monitor Education and Training Voucher funds by analyzing Integrated Child Welfare Services Information System data on a monthly basis. When DCF staff identified problems, they sent a notice to contract managers requesting that the lead agencies that had overspent these funds take corrective actions.

However, DCF administrators reported that the department did not perform this routine oversight between October 2007 and January 2010 due to staffing limitations. During the period when this monitoring was not done, lead agencies exceeded limits for voucher fund payments for 8% of the young adults who received these funds. Specifically, lead agencies exceeded the \$6,250 annual per-

⁴ Coding violations have decreased from 96 in Fiscal Year 2007-08 to 36 for Fiscal Year 2008-09.

young adult federal cap for Education and Training Vouchers for 132 of the 1,590 young adults who received these funds between July 2007 and June 2009.

The department has established a fiscal monitoring unit to track and analyze lead agency expenditures. Our prior report noted that several lead agencies had not spent their allocation of state and federal independent living funds for Fiscal Year 2005-06. We also noted that DCF had not required lead agencies to submit finalized invoices detailing expenditure information prior to receiving contract payments, and it was unable to determine how the lead agencies used general revenue funds.

In October 2008, the department created a fiscal monitoring unit to determine whether lead agencies use proper funding sources for various child welfare services.⁵ The department now requires lead agencies to submit invoices and actual expenditure reports for all programs within 20 days of the end of each month. Lead agencies must reconcile their invoices with data in the department's Integrated Child Welfare Services Information System in order to receive funding from DCF for the next month.⁶ The fiscal monitoring unit uses lead agencies' monthly expenditure reports and program performance indicators to compile quarterly fiscal indicators reports. DCF circuit administrators review these reports with the lead agencies and then notify the monitoring units of any problems that need additional follow-up.

DCF has enhanced its quality assurance and contract monitoring

The department has broadened the scope of its quality assurance and contract monitoring reviews to better address key elements of the Independent Living Program.

The department has implemented a new quality assurance system. Our prior report noted that DCF's quality assurance data tools focused on compliance rather than the quality of services provided to foster children, and did not address key elements of the Independent Living Program. In July 2008, the department replaced its compliance-focused quality assurance system with a Regional Quality Management System. In the new system, staff conduct quarterly quality assurance reviews of a sample of case files for each lead agency using a statewide core set of 70 quality assurance standards.⁷ Unlike the previous system, the new system includes four standards that assess quality of independent living services, including whether youth receive needed services and discuss their educational goals with their case manager. DCF and the lead agencies used this system to complete reviews for each quarter in Fiscal Year 2008-09 and the second quarter of Fiscal Year 2009-10.⁸

DCF has also conducted a series of special quality assurance program reviews at the request of an advocacy group. DCF published its initial special review in December 2009 which focused on management of services for 18- to 22-year-old

⁵ For more information on the fiscal monitoring unit, see *DCF Improves Contract Oversight of Lead Agencies; Fiscal, Quality, and Performance Assessment Are Undergoing Change*, OPPAGA [Report No. 08-39](#), June 2008.

⁶ Lead agencies receive funding in 12 monthly increments.

⁷ Lead agency staff review 25 cases each quarter; the lead agency reviews 17 and the department and lead agency staff conduct a side-by-side review on the remaining 8 cases. In Fiscal Year 2008-09, DCF examined two standards for the program, and the department added two additional standards in Fiscal Year 2009-10.

⁸ The department did not complete a quality assurance review for the first quarter of Fiscal Year 2009-10 because it used its quality assurance staff to assist in the Report on the Gabriel Myers Workgroup.

young adults.⁹ DCF will conduct two additional reviews that will focus on whether 17-year-old youth in out-of-home care are prepared to exit foster care and the quality of pre-independent living services assessments and services provided to 13- to 16-year-old youth.

The department has broadened the scope of its contract monitoring reviews. We previously reported that the department's contract monitoring tools did not examine key program elements and were limited to assessing whether lead agencies accurately determined eligibility for Road to Independence program recipients age 18 and older. Specifically, the monitoring tools did not address whether young adults receiving aftercare and transition services met eligibility requirements for those services or whether lead agencies complied with federal and state requirements for services provided to 13- to 17-year-old youth.

In response to our recommendation, the department has broadened the scope of these reviews to include new assessments of the Independent Living Program. Specifically, the department established six monitoring tools that assess whether lead agencies comply with statutes and rules when providing services, three tools that assess services for 13- to 17-year-old youth, and three tools that assess lead agency compliance with requirements for young adults over 18.

DCF continues to lack information about the adequacy and quality of lead agency independent living programs

DCF's data system continues to lack accurate information on independent living services provided to 13- to 17-year-old youth. DCF does not require lead agencies to report on

these services, and it is not monitoring whether lead agencies meet minimum contract standards for the services. DCF also has not established outcome measures for the program as required by law.

DCF's data system lacks accurate information on the services provided to 13- to 17-year-old youth. Florida statutes require the department and lead agencies to provide an array of independent living services for 13- to 17-year-old foster youth. Our prior report noted that DCF could not determine whether foster youth were receiving these services due to limitations in its own and lead agencies' data systems. While DCF's data system could identify the number of 13- to 17-year-old youth in licensed foster care who were eligible for independent living services, the system could not track the number of youth who received these services or what services were provided.

DCF has not sufficiently addressed this problem. Although DCF added data fields to its case management system in August 2009 to enable lead agencies to enter data on independent living services provided to each foster youth, it has not required lead agencies to use these data fields. In practice, lead agencies typically do not enter data on youth that could be used to determine the number served and the types of services they receive. As a result, in February 2010, the department's data system only contained information on 25% of the 13- to 17-year-old youth in licensed foster care who were eligible for independent living services.

Research shows that teaching independent living skills to foster youth at an early age can lead to more effective results over time. Accordingly, it is important for DCF to collect reliable information on whether lead agencies are addressing the needs of eligible 13- to 17-year-old foster youth.¹⁰

⁹ The report provides six recommendations, including a recommendation for the department to establish core requirements in the lead agencies' contracts for the program's structure and service delivery.

¹⁰ A November 2009 interim report by the Florida Senate's

DCF has not established an effective mechanism to ensure that lead agencies meet minimum contract standards for independent living services. The 2006 Legislature required DCF via proviso language to incorporate minimum independent living standards into lead agency contracts by July 1, 2007, as recommended in a 2004 OPPAGA report.¹¹ Further, the Legislature directed the agency to begin monitoring lead agency performance in accordance with these requirements by Fiscal Year 2008-09. These standards cover a comprehensive array of services including life skills, housing, education, and employment. The standards are intended to better ensure that foster youth receive the services they need to become self sufficient and that services are consistently delivered throughout the state. However our 2007 report noted that the DCF had made little progress in developing these standards.

DCF has incorporated minimum standards into lead agency contracts. However, it does not routinely assess whether lead agency services meet the standards. The department's December 2009 special quality assurance review of the program concluded that DCF needed to more frequently scrutinize the level and quality of program services. The report also found wide variations in lead agencies' processes for providing services to youth and young adults and recommended that DCF set contract requirements for program service delivery.

Committee on Children, Families, and Elder Affairs found that although attention to the needs of 13- to 17-year-old youth has increased significantly over the past decade, the services intended to help prepare them to live independently upon aging out of the system appear to remain limited and fragmented. The report found that concerns continue to be raised as to whether all eligible youth are being served, and whether the direction and oversight of community-based care lead agencies and providers are sufficient to ensure that the goals of the program are being met.

¹¹ *Independent Living Minimum Standards Recommended for Children in Foster Care*, OPPAGA [Report No. 04-78](#), November 2004.

DCF has collected information on program services, but has not established program outcome measures as required by law. The 2002 Legislature required DCF to develop outcome measures for independent living services.¹² Our prior report noted that the department had not finalized such measures, although it was working with the Department of Education to obtain data related to youth with a high school diploma or GED and young adults enrolled in postsecondary education.

The department still has not established such measures, although it is collecting information on the independent living services received by foster youth. While DCF contracts require lead agencies to meet contractually specified performance outcomes for other child welfare services, it has not yet established contractual outcome standards for the Independent Living Program. Such standards could cover critical program goals such as the percentage of youth served who graduate from high school. DCF managers report that it has formed a workgroup that includes department and lead agency staff that is developing outcome measures for the independent living program. DCF plans to incorporate outcome measures related to the Independent Living Program into lead agency contracts effective July 1, 2010.

The department and lead agencies conduct an annual survey of youth, young adults, and case workers that could be used to track performance towards some key independent living goals. These surveys include questions on housing arrangements, educational goals, and employment status for youth. Beginning in October 2010, the department will also participate in a federally required survey to gather information for the National Youth in Transition Database; this effort will collect information on youth who are in or who have aged out of foster care and the services they

¹² Chapter 2002-19, *Laws of Florida*.

receive. The department must begin reporting this data in May 2011. The department should use these data as well as data from external sources such as the Agency for Workforce Innovation's employment

information to develop an effective mechanism to assess the extent to which the Independent Living Program is meeting its statutory goals to prepare foster youth for productive adult lives.

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