

DEPARTMENT OF SOCIAL SERVICES

CHILDREN'S DIVISION

P. O. BOX 88

JEFFERSON CITY, MISSOURI

February 10, 2020

M E M O R A N D U M

TO: CHILDREN'S DIVISION AND CONTRACTED STAFF
FROM: REGINALD E. MCELHANNON, INTERIM DIRECTOR
SUBJECT: INDEPENDENT LIVING ARRANGEMENTS

DISCUSSION:

The purpose of this memorandum is to clarify qualifications of an Independent Living Arrangement (ILA) as a placement type, new requirements, and introduce a new review process. The changes are effective with this memo. Missouri reports data annually on youth in ILA placements and this placement type must meet the requirements as outlined in the Child Welfare Policy Manual to avoid audit findings that result in a Program Improvement Plan.

Youth in Independent Living Arrangements, while often viewed as doing well and being capable of living "independently", need as much if not more support than youth in other placement types as there is not a resource parent in the young person's life and they often have limited personal connections. Effective with this memo, youth in an ILA placement must have two contacts per month, at least one in person in their living environment. As ILA is the only placement type in which there is not a resource provider involved, this level of contact is a necessary next step to help improve outcomes and successful transition of youth exiting state custody.

Youth Criteria:

- Youth in an ILA should have a goal of Another Planned Permanent Living Arrangement (APPLA) and must be receiving Chafee Services prior to the placement being made. Although licensure is not involved, an ILA is a planned and approved living arrangement that must meet certain criteria to ensure the safety and wellbeing of the youth. Youth in an ILA should be able to demonstrate competency in life skills, manage his/her own finances, demonstrate responsible conduct, and are attending school and or working. An FST or Team Decision Making Placement Stability meeting shall occur prior to a youth moving into an ILA.
- Youth in an ILA must be at least 18 years old; in Missouri, youth under the age of 18 are not allowed to enter into a lease agreement, which is vital to provide housing stability. Youth who are 17 may be considered for ILA if they have

obtained their high school diploma or HiSet. Youth who are still attending high school are typically not able to focus on the demands of sustaining an ILA residence thus they should be referred for the Transitional Living Program instead.

Household Composition:

- Youth in an ILA are allowed to have roommates, however, ILA is not to be used as a substitute for relative licensure to provide a form of maintenance for the family, including the biological parent whose rights have been terminated. Placement with a safe supportive adult is always ideal over an Independent Living Arrangement whenever possible. If placement with an adult caregiver is the plan for the youth, another placement code should be used instead of ILA.
- ILA shall not to be used in situations where the youth is living with a parent. Foster Care is a form of substitute care for children whose safety or well-being requires they be removed from the home of their parent(s). If the parent of the foster youth resides in the home, the foster youth is no longer “removed from the control of his parents” per RSM0 211.011 nor is the youth “unattended by parent” per RSMo 210.481(4).
- ILA shall not be used as a placement with friends or family members who are unable to meet licensure requirements. If an adult exercises authority over the youth or has in the past, or the youth is paying “rent” to a family member or former foster parent while residing in the same residence, this is not an appropriate ILA placement.
- A youth in an ILA shall not be providing supervision or authority over any other youth residing in the home. Consequently siblings of youth in an ILA may not be “placed” with the youth as an ILA placement. If a sibling meets all of the ILA requirements, the siblings may however reside together as housemates. For example, a 15 year old and an 18 year old may not reside together in ILA placements as a 15 year old does not meet the age requirements. However, an 18 year old and a 19 year old sibling may reside together as they both meet the age requirements for ILA. Youth working on their own successful transition from foster care should not be put in a position of having parental authority over a sibling, and youth under the age of the ILA requirements are in need of parental authority.

Service and Supervision Provisions:

- If a youth resides in a community program that provides living arrangements such as Job Corp, this is an ILA placement and the youth shall receive maintenance directly to them as they are living independently. The youth may visit a resource family on the weekend however the majority of the time the youth is residing in a program and thus it is not a foster care placement.

- Youth in an ILA shall not “rent” a room or apartment from a foster parent or parent. ILA is meant to be a community setting for independence. Renting from a parent or foster parent can result in complications as these persons have had authority over the youth in the past and leave the youth in a vulnerable position, such as homelessness, should the relationship change.
- If a youth is case managed by an agency outside of Children’s Division or Foster Care Case Management, such as the Department of Mental Health or a group home program that is not licensed but in which staff reside, this is not an ILA. Youth in an ILA should be able to manage their own physical and mental health needs on a daily basis, are able to come and go on their own, and have entered into a lease agreement to reside in the dwelling. Youth who qualify for an ILA should have a plan to exit to independence, not to the care of another agency.
- There are some community agencies providing services similar to transitional living program services via an apartment or a group home setting that are not licensed and contracted with Children’s Division to provide this service. These programs are not approved to provide services for youth in foster care so youth should not be placed with them and coded as an ILA. Staff in these facilities are not monitored by Children’s Division. If a youth is in need of a [Transitional Living Program](#), a referral shall be made with an agency who is contracted with Children’s Division to provide this service.

Steps To Be Taken:

New Tools:

Two new tools have been developed to be used in conjunction with the [CS-TLP1](#) for placement in an ILA: Independent Living Arrangement Checklist, CD-282 and the Self-Developed Case Plan for Independent Living Arrangement, CD-283.

- The ILA Checklist, CD-282 has been developed for use with all youth currently residing in or being considered for an ILA placement. For any youth with a placement code of ILA, the Independent Living Arrangement Checklist, CD-282 and the [CS-TLP-1](#) shall be completed within the next 30 days and the process outlined below followed to ensure youth currently coded as ILA are appropriately placed and safe. The Independent Living Arrangement Checklist, CD-282 and the [CS-TLP-1](#) shall be completed each time the youth moves to a new ILA to ensure the living environment is safe and meets ILA requirements. The checklist should be reviewed quarterly by the case manager and the supervisor during case consultation. If a youth is determined to not meet the criteria for an ILA placement, the coding shall not be used.
- The Self-Developed Case Plan for Independent Living Arrangement, CD-283 is used to assist with preparation and budgeting for an initial ILA placement.

Prior to Placement:

Moving forward, for any new placements in which ILA is being considered, **PRIOR** to placement being made, the Children’s Service Worker shall send the completed ILA

Checklist, CD-282 and the Self-Developed Case Plan for Independent Living Arrangement, CD-283 to the Circuit Manager (CM)/Program Manager (PM) for review.

- After reviewing, the CM/PM will indicate whether the placement constitutes an ILA per the criteria in the Child Welfare Policy Manual. A decision as to whether the placement meets ILA criteria should be determined within 30 days after the checklist is initially received.
- If the placement does not meet the criteria for an ILA, and the family support team or court wishes to pursue the living arrangement, a different placement code will need to be used (i.e. RHU, CTO, etc.).

A copy of the Independent Living Arrangement (ILA) Checklist, CD-282, the [CS-TLP-1](#), and the Self-Developed Case Plan for Independent Living Arrangement, CD-283 shall be placed in the youth’s file in the Older Youth Program section and a copy shall be provided to [the Regional Older Youth Transition Specialists](#) upon completion.

<p>NECESSARY ACTION</p> <ol style="list-style-type: none"> 1. Review this memorandum with all Children’s Division staff. 2. Review revised Child Welfare Manual chapters as indicated below. 3. All questions should be cleared through normal supervisory channels and directed to: 	
<p>PDS CONTACT Sally A. Gaines (660)882-5312 ext. 230 Sally.A.Gaines@dss.mo.gov</p>	<p>MANAGER CONTACT Ivy Doxley (573)526-1422 Ivy.Doxley@dss.mo.gov</p>
<p>CHILD WELFARE MANUAL REVISIONS Section 4 Chapter 5 Overview Section 4 Chapter 5.5 Independent Living Arrangement Section 4 Chapter 5.9 Exit Plan Section 7 Glossary “A” Section 7 Glossary “C” Section 7 Glossary “I” Section 7 Glossary “N” Section 8 Glossary “O”</p>	
<p>FORMS AND INSTRUCTIONS Independent Living Arrangement Checklist, CD-282 (new) TLP Advocate and Independent Living Arrangement (ILA) Checklist, CS-TLP-1 Self-Developed Case Plan for Independent Living Arrangement, CD-283 (new)</p>	
<p>REFERENCE DOCUMENTS AND RESOURCES</p>	
<p>RELATED STATUTE RSMo 210.481(4)</p>	

