



OCT 30 1998

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REGION IV  
Room 3T41  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8909

Mr. Tommy C. Olmstead, Commissioner  
Georgia Department of Human Resources  
47 Trinity Avenue, S.W.  
Atlanta, Georgia 30334-1202

Dear Mr. Olmstead:

This final report provides you with the results of our review of Georgia's Independent Living Program (ILP) for Fiscal Year (FY) 1996. The objective of our review was to determine if youth were successfully transitioning from foster care to independent adult living when they became ineligible for foster care maintenance payments at the age of 18.

### SUMMARY OF FINDINGS

Based on the limited information available, we were unable to conclude if youth made a successful transition from foster care to independent adult living when they became ineligible for foster care maintenance payments. However, we did note areas where the State could improve its administration of the program. These areas are: (1) outcome measures, (2) written transitional living plans, and (3) program reporting.

#### Outcome Measures

The State lacked outcome measures to accurately assess whether youth made a successful transition from foster care to independent adult living. Specifically, the State did not perform Administration for Children and Families (ACF) required 90-day follow-ups after participants complete the program. The 90-day outcome measurement was not a priority for the State; however, it is essential to assess program performance.

We recommend the State give priority to performing 90-day follow-ups for discharged youth.

#### Written Transitional Living Plans

Written Transitional Living Plans (the plan) were not always completed, updated and maintained in the case files as required by the State's foster care policies and procedures. Generally, the coordinators did not consider preparation and maintenance of the plans a priority. As a result, the State lacks the necessary tools to assist in assessing the youths' progress in transitioning to independent living.

We recommend the State ensure the coordinators consider preparation and maintenance of the plans a priority.

## Program Reporting

The *State Annual Program Report* for FY 1996 was inaccurate and not adequately supported. The Independent Living coordinators used their own interpretations of the State's guidance when submitting youth participation results. Also the coordinators were not aware they should maintain demographic information for youth being reported to the State. Inaccurate information precludes either ACF or the State from adequately accessing the effectiveness of the program.

We recommend the State: (1) establish a clear definition of when youth should be reported as served; (2) insure the coordinators report program activity consistently and maintain detailed documentation to support information submitted in the State's annual program reports.

In written comments to our draft report, State officials generally disagreed with our findings and recommendations. The State's comments are summarized after the Recommendations sections of the report. The State's comments are included in their entirety as the **APPENDIX**.

## BACKGROUND

The ILP<sup>1</sup> provides services to youth, age 16 and over, who are in foster care or were in foster care after the age of 16, to help them make the transition to independent living. Activities include educational and employment assistance, training in daily living skills, individual and group counseling, coordination of services and outreach programs. These programs are intended to prepare the youth to live independently of public support. At the Federal level, the ILP is administered by the ACF. The State of Georgia's ILP is administered through the State Department of Human Resources, Division of Family and Children Services Foster Care Unit.

### *Georgia's ILP*

The State's program has one State Consultant and 19 County coordinators. The coordinators are responsible for providing services to all 159 local counties in the State. The State estimates that in a given month, about 10,800 children are in family foster care, and another 1,000 are in institutions, group homes or hospitals. During FY 1996, Georgia reported 1,538 youth eligible for the Independent Living Program. Georgia also reported they served 1,237 of these eligible youth. The State received approximately \$1.1 million in Federal funds during FY 1996 to administer independent living services. Georgia provided another \$347,000 in State funds for the program. For FY 1996, Georgia reported ILP expenditures totaling \$1,053,691.

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<sup>1</sup> The *Consolidated Omnibus Reconciliation Act* of 1985, (P.L. 99-272) established the Independent Living Program by Amending Title IV-E to include Section 477.

Personnel	\$ 697,259
Supplies and Miscellaneous	170,527
College Tuition Payments	143,319
Travel	31,538
Other	11,048
Total	\$1,053,691

Georgia uses a written transitional living plan as required under Federal regulations in assessing foster care youth eligible for independent living services. Coordinators offer training that focuses on tangible skills, such as home management, housing, employment, money management, as well as on intangible skills such as decision-making, self-esteem, communication, and socialization skills. Services range from holding weekly or monthly skill workshops, to disseminating information through the mail to rural youth. The State places great emphasis on the education component for youth enrolled in ILP and encourages youth to complete high school or obtain General Equivalency Diplomas (GED). The State strongly encourages youth to pursue post-secondary education after high school and uses grant funds to assist with tuition payments.

### OBJECTIVES, SCOPE AND METHODOLOGY

The objective of our review was to determine if youth were successfully transitioning from foster care to independent adult living when they became ineligible for foster care maintenance payments at the age of 18.

To accomplish our objective, we reviewed the State's records to determine if youth that exited foster care during FY 1996 were currently: (1) receiving public assistance such as the Aid to Families with Dependent Children, Food Stamps, or Medicaid, (2) employed based on State Department of Labor reports or (3) incarcerated in the State prison system. We also reviewed the State's year-end program report for FY 1996, supporting documentation, policies and procedures for administering the program, and related financial reporting records.

Field work was performed at ACF's Atlanta Regional Office and the State of Georgia's Department of Human Resources from February 1997 through August 1997 and March 1998 through May 1998. We also performed on-site work at the DeKalb County Department of Family and Children Services. In addition, we conducted telephone interviews with ILP coordinators located at various county offices throughout the State of Georgia.

On August 26, 1998, we held an exit conference with State officials to discuss the draft report's findings and recommendations. On September 2, 1998, we provided the State copies of working papers documenting our interviews with the State's ILP coordinators. On September 22, 1998, we received the State's written comments on our draft report's findings and recommendations. On September 28, 1998, we requested the additional documentation the State referenced in their written comments relative to our findings on 90-day follow-ups, written transitional living plans, and program reporting. On October 15, 1998, we met with a State official to obtain and review the additional documentation.

We did not perform a review of the States' internal accounting controls. Work was performed in accordance with generally accepted government auditing standards.

## RESULTS OF REVIEW

Based on the limited information available, we were unable to conclude if youth made a successful transition from foster care to independent adult living when they became ineligible for foster care maintenance payments. However, we did identify three areas where the State could improve its administration of the program. The areas are: (1) outcome measures, (2) written transitional living plans, and (3) program reporting.

### OUTCOME MEASURES

The State lacked outcome measures to accurately assess whether youth made a successful transition from foster care to independent adult living. Specifically, the State did not perform ACF required 90-day follow-ups after participants complete the program. The 90-day outcome measurement was not a priority for the State. Therefore, the State lacked basic accountability in determining effective practices in order to allocate its resources more appropriately.

The State could not accurately assess whether youth were successfully transitioning from foster care to independent adult living. One of the program's weakest areas was the lack of information regarding outcomes for youth. The State was unable to assess their program and determine if the services were effective. In addition, the State did not perform formal 90-day follow-ups on discharged youth. Instead, in its FY 1996 annual program report<sup>2</sup>, the State reported the last status of the youth at the time of discharge.

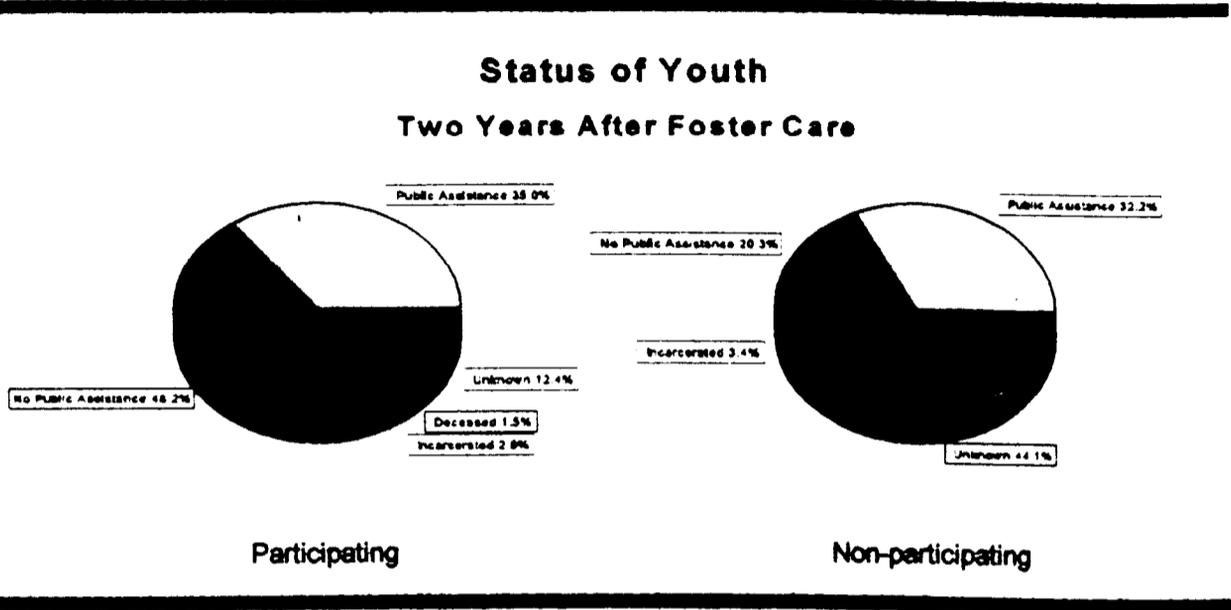
The State reported 272 participating youth discharged from foster care and an additional 78 non-participating discharged during FY 1996. We were unable to reconcile listings of discharged youth obtained from the county coordinators to the information contained in the State's annual program activities report. The State did not maintain supporting documentation that identified the youth reported. At our request, the State recreated a listing of discharged youth. However,

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<sup>2</sup> Report entitled, *Georgia's Independent Living Program*.

the recreated list was incomplete and only showed 137 participating and 59 non-participating youth that exited foster care.

Because the State did not perform 90-day outcome measurements, we attempted to determine if there was any significant differences in the outcomes of participating and non-participating youth 2 years after discharge. Our assessment was based on limited information maintained by the State's welfare, prison and labor records. We were unable to make a complete determination as to the effectiveness of the program. However, it appears the participating youth and non-participating youth were similar in their success transitioning from foster care to independent adult living.



The graph shows that 2 years after foster care, the percentage of youth receiving public assistance and youth that were incarcerated was about the same for those who participated in ILP and those who did not participate in ILP.

We were unable to assess the status of a significant number (44.1 percent) of nonparticipating youth because the State did not have the youth's identifying information such as social security number and date of birth.

The ultimate goal of the independent living program is to prepare foster care youth to live independent of public assistance once they become ineligible for foster care maintenance payments at the age of 18.

While the State is not mandated by Federal law or regulation to establish long-term performance measures, the Federal Government recognizes their importance. For example, in order to improve Federal programs, Congress enacted the Government Performance and Results Act of 1993. The

Act requires Federal agencies to improve program effectiveness through the establishment of measurable performance indicators.

Performance indicators are a composite of program inputs, outputs, outcomes, productivity, timeliness, quality, and other factors relating to program activities. Performance indicators promote program improvements by pointing to areas of excellence and weakness. Performance measures are used to quantify the level of achievements and performance.

As a minimum performance indicator, ACF's guidelines require States to perform 90-day follow-ups after participants complete the program together with a description of the criteria used to measure achievements, e.g., number of youth employed, have completed high school or GED, have or are attending college, have obtained housing or other community services, and are living independently of agency maintenance programs, etc.

### **90-day Outcome Measurement**

The State has not made 90-day outcome measurement a priority. County coordinators indicated it would be difficult to track youth after foster care and stated they were not required by the State to perform 90-day follow-ups. In addition, the State did not have policies and procedures that required youth to be tracked 90-days after they completed independent living services and left the foster care program.

The lack of 90-day follow-ups preclude the State and Federal managers to accurately assess the program's success. As a result, it is unknown whether limited Federal and State resources are being used in the most effective manner, such as enhancing continued services or perhaps identifying weaknesses in areas where additional funds should be directed.

In addition, program results are misleading when the status of youth is reported at discharge rather than 90-days afterwards. Reporting inaccurate program information also weakens basic accountability and hinders efforts to improve programs and determine effective practices.

### **Recommendation**

We recommend the State give priority to performing 90-day follow-ups of youth that have completed the program and discharged from foster care.

### **State Comments**

In written comments, State officials said that Georgia has had outcome measures as a part of its ILP since 1989 and these measures were updated and strengthened in May 1997. In addition, in our October 15<sup>th</sup> meeting, a State official told us they do not perform 90-day follow-ups. Instead, the State uses the ILP's Aftercare program as a follow-up mechanism.

## OIG Response

The ILP's Aftercare program does allow the State to continue services to youth who seek Aftercare. However, because Aftercare is voluntary, the outcomes for a significant number of youth may not be known beyond their date of discharge from foster care. The State did not make an attempt, subsequent to the date of discharge from ILP, to determine the status of those youth not enrolled in Aftercare.

## WRITTEN TRANSITIONAL LIVING PLANS

Written transitional living plans (the plan) were not always completed, updated and maintained in the case files as required by the State's foster care policies and procedures and the *ILP Coordinators Handbook*. Generally, the coordinators did not consider preparation and maintenance of the plans a priority. As a result, the State lacks the necessary tools to assist in assessing the youths' progress in transitioning to independent living.

At one county office, our review of 110 case files maintained by the ILP coordinator showed:

- ▶ 36 case files were missing;
- ▶ 26 case files had either no plan or the plan was blank;
- ▶ 38 case files had incomplete plans; and
- ▶ 10 case files had complete plans.

The State requires the plan to be maintained in the ILP case file as well as the foster care case file. Accordingly, we reviewed case files maintained by the caseworkers for 10 of the above 110 cases. We found five files had either no plan or the plan was incomplete. The plans were incomplete in that three plans were signed only by the caseworker, one plan had no signatures and one plan was not in the case file. The State's ILP policies and procedures require plans to be signed by the participant, caseworker and ILP coordinator. In addition, four files were unavailable because the youth had been discharged from foster care. Only one file contained a completed plan.

Furthermore, our discussions with coordinators across the State disclosed, in general, the coordinators considered the plans the responsibility of the caseworkers. Most coordinators indicated they were not involved in developing or updating the plans. At the one county office, we visited, we found little evidence of 6-month updates to the plans. For example, one plan indicated a youth's goal was to complete high school. However, the youth dropped out of high school and the plan was not updated to show alternative goals, such as a GED or vocational training. The youth has since aged out of foster care.

Section 475 (1) of the Act requires a written transitional plan for each youth participating in the ILP. The plan should include a needs assessment and should be incorporated into the foster care case plan. In addition, the State requires the plan to be established for each foster care youth age 16 or over and updated every 6 months or modified as needed.

Generally, the coordinators did not consider preparation and maintenance of the plans a priority. They considered the plans a responsibility of the caseworkers. Also, the coordinators indicated the plans were updated only if there were changes in the youths needs or goals and not every 6 months as required. As a result, the State lacks the necessary tools to assess the youths' progress in transitioning to independent living.

### **Recommendation**

We recommend the State ensure the coordinators consider preparation and maintenance of the plans a priority. Specifically, plans should be included in every case file and updated every 6 months. The coordinators should document their review of the plan even if no changes are necessary.

### **State Comments**

State officials said that case managers are required to complete the Written Transitional Living Plans (WTLP) and maintain them in their case files. State officials also said that the auditors did not look at any case manager files. In the October 15<sup>th</sup> meeting, a State official said the ILP coordinators also use an *Independent Assessment for Life Skills* instrument to supplement the WTLP.

### **OIG Response**

Although case managers are required to maintain the plan in the case files, our review of 10 case files showed some of the files either had no plan or the plan was incomplete. In addition, the fact that some ILP coordinators serve more than one County reinforces the need for the plans to be readily available in the coordinator's files.

We did not determine if case files contained the *Independent Assessment for Life Skills* instrument. Nevertheless, the *ILP Coordinators Handbook* requires the plan to be complete and maintained in the ILP coordinator's case file.

## **PROGRAM REPORTING**

The State's annual program report for FY 1996 was inaccurate and not adequately supported. Under the Act, program reports should contain detailed information relating to the youth participating in the ILP. The coordinators used their own interpretations of the State's guidance when submitting youth participation results. Also, the coordinators were not aware they should maintain demographic information for youth being reported to the State. Inaccurate information precludes either ACF or the State from adequately accessing the effectiveness of the program.

### **Youth Served Inaccurately Reported**

The majority of the county coordinators reported eligible youth as served regardless if they attended training workshops, conferences, or weekly skills meetings. The coordinators

considered providing input in the WTLF as serving the youth. Also, the coordinators were not consistent in defining when youth completed skills training categories. For example, the majority of the coordinators reported all youth that participated in a skills training as if they completed the training. Furthermore, neither the State nor county coordinators maintained adequate detail to support information reported in their Annual Program Report for FY 1996.

Under ACF guidelines to States, program reports should include: (1) an accurate description of the independent living activities conducted and the services provided, (2) a complete record of the purposes for which funds were spent, and (3) a detailed description of the number and characteristics of the eligible population as of the beginning of the FY being reported upon and a description of the individuals served during that FY.

The State provided coordinators with guidance and training to assist them in reporting program participation activity; however, the guidance is unclear and the coordinators used their own interpretations of the guidance when submitting program results.

In preparing the annual report to ACF, the State office obtains year-end summary information from the coordinators in the form of final number counts for each category being reported, i.e., number of youth served, received daily living skills, career planning skills, etc. The coordinators only retained documentation showing the final number counts by reporting category. The coordinators were not aware that they should maintain actual names and descriptions of youth being reported to the State.

As a result, information submitted to ACF in the States' annual report for FY 1996 was misleading and therefore, precluded either ACF or the State from adequately accessing the effectiveness of Georgia's ILP.

#### **Recommendation**

The State should: (1) establish a clear definition of when youth should be reported as served; (2) insure the coordinators report program activity consistently and maintain detailed documentation to support information submitted in the States' annual program reports.

#### **State Comments**

State officials said that they initiated corrective actions in February 1998 based on their own internal evaluation of program reporting. At our October 15<sup>th</sup> meeting, a State official told us they had started to attach a separate report to the quarterly program results report that showed the number of foster care children who had completed a skill. The State official also told us the reporting issue is addressed at each quarterly meeting with the coordinators.

#### **OIG Response**

At the October 15<sup>th</sup> meeting, the State official did not provide us with a copy of the internal evaluation findings we requested in our September 28<sup>th</sup> letter to the State. The inclusion of a

separate report showing the number of youth completing a skill does not address our finding that coordinators are inconsistently reporting the number of youth "served," "participated," and "completed."

At the October 15<sup>th</sup> meeting, the State official could provide us with only a copy of the agenda for the most recent quarterly coordinators' meeting. According to the State official, handouts or other material were not provided to coordinators at the quarterly meeting to reinforce the definition of youth "served," "participated," and "completed."

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In accordance with the principles of the Freedom of Information Act (Public Law 90-23), Office of Inspector General, Office of Audit Services reports issued to the Department's grantees and contractors are made available, if requested, to members of the press and general public to the extent information contained therein is not subject to the exemptions in the Act which the Department chooses to exercise.

We request that you respond within 30 days from the date of this letter to the Department of Health and Human Services action official shown below. Your response should present any comments or additional information that you believe may have a bearing on the final determination.

To facilitate identification, please refer to the above Common Identification Number (CIN) A-04-97-00113 in any correspondence related to this report.

Sincerely yours,



Charles J. Curtis  
Regional Inspector General  
for Audit Services, Region IV

**Direct Reply To:**

Mr. Stephen J. Golightly  
Regional Administrator/HUB Director  
Administration for Children and Families



Georgia Department of Human Resources  
Division of Family and Children Services • Two Peachtree Street, NW • Suite 16-200 • Atlanta, Georgia 30303-3142 • (404) 657-5177

September 17, 1998 **RECEIVED**

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Office of Audit Svcs.

John Drake  
Audit Manager  
Region IV, Room 3T41  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8909

Dear Mr. Drake:

As we discussed at the exit conference on August 26, 1998, we have numerous fundamental concerns about features of the audit methodology and findings.

We work closely with the Administration for Children and Families (ACF) and value the advice and technical assistance that this office provides. Over the years, improvements have been made in our child welfare programs as a result of constructive information gleaned from audits conducted by regional staff at ACF. We will follow any instructions received from ACF; however, we wish to reiterate our concerns from the exit conference on August 26, 1998.

The material reviewed for the audit came from one of our 159 counties; was limited to interviews only with the Independent Coordinators who in turn only perform specific services and have policy knowledge only of their functions and maintain records on only these functions.

Over the 14 months that the audit was conducted, we offered to explain the other elements of Georgia's ILP including other staff, policy and records involved with each ILP youth; however, our efforts were not accepted or understood. The most basic policies and organizational structure of the ILP are misconstrued and misrepresented in the Draft Report. As explained in the exit conference, the report is so skewed and inaccurate it is virtually impossible to respond to the findings.

We identified four recommendations in the report for comment:

**Georgia Should Give Priority to Developing Outcome Measures for its ILP**

Georgia has had outcome measures as part of the ILP since 1989. These measures were revised and strengthened in May 1997.

Mr. Drake  
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**Georgia Should Ensure that IL Coordinators Prepare and Maintain Written Transitional Living Plans (WTLPs)**

IL Coordinators are one-half of the team and therefore maintain one-half of the case records working with eligible youth. The auditor did not understand that case managers are the other one-half of the team. Case Managers are required to complete the WTLPs. They maintain the WTLPs in their case files. The auditor did not look at any case manager files.

**Georgia Should Establish a Clear Definition of Youth Served and Ensure that Coordinators Report Program Activity with Detailed Documentation to Support the Information in the Annual Report**

This suggestion is good. However, our internal self-evaluation determined this need and we implemented corrective action based on our own findings in February 1998.

OIG/OAS Note: The State's comments have been deleted at this point because they no longer apply to information in this report.

For the above reasons, we request that the report be nullified and withdrawn. Please let us know your decision so that we can advise Commissioner Olmstead.

Sincerely,

  
Clinton E. Dye, Jr., Ph.D.  
Social Services Director

CED/dwo

cc: Peggy Peters, DFCS Director  
Steven J. Golightly, Regional Administrator ACF  
Bessie Barnett, Child Welfare Specialist ACF  
Robbie Connelly