TO:   Local District Commissioners

SUBJECT: Federal Fiscal Year 1999-2000 Independent Living Allocations

B: Chafee Foster Care Independence Program (CFCIP) Assurances (Available on-line)

I. PURPOSE

The purpose of this memorandum is to transmit to social services districts the Chafee Foster Care Independence Program (CFCIP) funds allocations from the Federal Fiscal Year (FFY) 1999-2000 CFCIP appropriation. (A summary of CFCIP provisions was communicated to districts on March 6, 2000 in 00 OCFS LCM-7.) As provided in the Federal statute [the Foster Care Independence Act of 1999; U.S. Code 677(d)(3)], the appropriated funds may be spent in the fiscal year in which appropriated or in the succeeding fiscal year. Therefore, the allocations contained in Attachment A to this memorandum may be used for Independent Living (IL) services expenditures made between October 1, 1999 and September 30, 2001, up to the amount of the allocation and subject to a twenty percent (20%) State and Local Match requirement.

This memorandum also explains differences from previous allocations, describes the methodology for the 1999-2000 allocations, sets out guidelines relating to eligible expenditures and the requirements for the 20 percent match required to obtain reimbursement from the CFCIP funds allocation, and provides general claiming and reporting instructions.
II. CHANGES FROM PREVIOUS FUNDING FOR INDEPENDENT LIVING

The CFCIP provisions contain significant changes from previous Federal funding for IL services.

1.) The CFCIP provisions replace the former IL initiative provisions authorized under Title IV-E of the Federal Social Security Act. Title IV-E eligibility is not a requirement for Federal reimbursement of IL services from CFCIP funds.

2.) Federal reimbursement is available for only 80 percent of total reported IL expenditures. A 20 percent State/local match is required. (This replaces the previous funding formulas which were 100 percent or 50 percent Federal.)

3.) There is no longer a prescribed Federal lower age limit for reimbursable expenditures for IL support and services. For those social services districts that choose to provide IL services to youths aged 14 and 15 who are likely to remain in foster care until age 18, CFCIP Federal reimbursement is now available.

4.) Prior to the enactment of CFCIP, Federal law allowed states to provide services (but specifically excluded room and board payments) to youth age 18 through 20 who had been foster children prior to their discharge. However, Federal reimbursement was not available for these services. The new law requires the provision of financial, housing, counseling, employment, education and other appropriate support and services to youth who have left foster care because they have attained 18 years of age but who have not yet attained 21 years of age and makes CFCIP funds available to support such services. CFCIP funds and the IL program are not applicable after a youth reaches 21. In addition, reimbursement is now available for room and board expenses for IL eligible youth aged 18 to 21 who are being discharged from foster care or who have been former foster children. However, no more than 30 percent of CFCIP funds may be used for room and board payments for discharged foster care children.

5.) The dollar value of the resources that a child or youth may accumulate and remain eligible for Federal Title IV-E reimbursement for foster care services (including maintenance) is increased from $1,000 to $10,000. Youth under 18 receiving IL services with CFCIP funds while still in foster care and preparing for discharge to IL will retain Title IV-E eligibility for their maintenance (room and board) while possibly accumulating resources in preparation for their IL discharge. CFCIP funds may not be used for room and board for children under the age of 18.

6.) Providers of IL services may now include both private not-for-profit and for-profit facilities. The previous Title IV-E IL provisions allowed the State (and, by extension, the social services districts) to choose only not-for-profit providers for IL services. Social services districts are reminded that they must establish contracts or purchase-of-service agreements, in
accordance with OCFS regulations, for any providers of services other than social services district personnel.

The 80 percent reimbursement formula applies to all IL expenditures during the applicable reimbursement period of October 1, 1999 through September 30, 2001. The other changes made by the Act did not become effective until December 14, 1999, when the Federal statute was officially enacted. Claims for expenditures made between October 1, 1999 and December 13, 1999 may be only for expenses relating to IL services provided to youth age 16 and older and may not include any room and board expenses. (In addition to these funds which may be expended through September 2001, the CFCIP provisions support additional annual Federal appropriations for Federal Fiscal Year 2001-2002 and beyond.)

Each of these changes is discussed more fully below in the context of each area to which the change applies.

III. ELIGIBLE EXPENDITURES

The Chafee Foster Care Independence Act sets out five broad purposes to which CFCIP funds may be applied:

1) Identify children and youth who are expected to remain in care until age 18 and help them to make the transition to self-sufficiency;

2) Help these children and youth to receive the education, training and services necessary to obtain employment;

3) Help these children and youth to prepare for and enter post-secondary training and education institutions;

4) Provide personal and emotional support for children aging out of foster care;

5) Provide a range of services and support for former foster care recipients between the ages of 18 and 21 to compliment their own efforts to achieve self-sufficiency and to assure that program recipients recognize and accept their personal responsibility for preparing for adulthood.

Within this framework, CFCIP funds can be used to provide and/or enhance services and supports for youth in foster care with an IL permanency planning goal. IL services (and CFCIP funding) are available for all eligible children and youth who are likely to remain in foster care until age 18, regardless of whether they are (or were) eligible for the Title IV-E Foster Care Program.

The Foster Care Independence Act makes it clear that IL services are to be seen as services to youth that will help them transition to adulthood,
regardless of whether they end up on their own, return home, are adopted, or live in some other permanent living arrangement. IL services are not an alternative to adoption for children or youth for whom that goal is appropriate. Accordingly, enrollment in IL programs can occur concurrently with efforts to locate and achieve placement in an adoptive family or for other options for permanence.

The Foster Care Independence Act provides flexibility to states and IL services providers regarding the services that can be provided for IL youth and receive CFCIP funds reimbursement. The Act does not specify what services must be provided but does include several examples of services that could be provided with CFCIP funds to youth in care under the age of 18 who have an IL goal:

- assistance in obtaining a high school diploma, including assistance or support for remaining in school or support or training or other assistance to obtain a General Equivalency Diploma (GED);
- career exploration, vocational training, job placement and job retention assistance and support;
- training in daily living skills;
- training in budgeting and financial management skills;
- substance abuse prevention;
- preventive health activities (including smoking cessation, smoking avoidance, nutrition education, and pregnancy prevention);
- education, training and services necessary to obtain employment;
- assistance in preparing for and entering post-secondary training and education;
- the promotion of mentoring and other interactions with dedicated adults.

In addition, the Act provides that CFCIP funds can be expended for former foster care recipients between 18 and 21 years of age to provide financial, housing, counseling, employment, education and other appropriate services that support IL goals of self-sufficiency and personal responsibility for making the transition from adolescence to adulthood. No more than 30 percent of CFCIP funds may be used for room and board payments.

The Act also requires that IL programs and IL providers should encourage participation by IL youth in planning, including having IL recipients accept personal responsibility for their transition to self-sufficiency.
Previous IL guidelines from this Office included the following services that would be eligible for reimbursement from IL allocations funds. These services would also be eligible for reimbursement from CFCIP funds.

Assessment Services and Case Planning must be provided to youth for whom IL is established as a goal or who are deemed to have a goal of IL based on age and length of time in care as defined in 18 NYCRR 430.12(f). Social services districts may, at their option, provide IL services to any youth over the age of 14 regardless of the youth's goal or length of time in care. The Assessment and Case Planning activities are incorporated into the current Utilization Review requirements. The standards relating to IL take into consideration and, where appropriate, include self-identified goals and activities of the foster child. At a minimum, joint discussion of the plan, its rationale, and its sequence is to be held with the youth at the plan's inception and at each six-month reassessment.

Each youth who will be discharged to IL must receive a 90-day notification of discharge, including an established discharge plan. The discharge plan must outline coordination of services otherwise available to the youth who is to be discharged.

Educational Services must be included as an integral part of the IL plan for each youth over the age of 16 and should be considered as part of any IL plan for any youth.

**Academic Support Services** are services provided to support the completion of the foster child's formal education either through completion of a high school diploma program or the attainment of a General Equivalency Diploma (GED). Where appropriate, these services can also be provided to those youth for whom continuation in a college degree program is determined beneficial. Academic Support Services for which payment can be made include, but are not limited to, educational and career assessment and counseling, tutorial services, remedial instruction, examination preparation, enrollment fees for training courses, and resource and referral services. Payment of college tuition expenses is not allowable under Academic Support Services.

**Vocational Training** can be provided, where appropriate, to those youth in foster care who will not pursue post-secondary education or who may not graduate from high school before their twentieth birthday. Vocational Training includes, but is not limited to, training designed to develop a marketable skill or trade, apprentice or apprentice type programs, or on-the-job training. Vocational Training can include two-year college programs (including Associate Degree programs) with specific vocational objectives, occupational training supported by other State or Federal funds, or training provided by organizations which have demonstrated effectiveness in providing such training. Vocational training will generally be provided in an institutional setting, but may also include worksite observation and experience credit as well.
Vocational training would not be appropriate for youth who cannot benefit from such training due to limited academic or other proficiency. Remedial education may be a prerequisite to providing vocational training for such youth. In such instances, the remedial education provided to qualify a youth for vocational training may be provided as vocational training.

Independent Living Skills Training is training provided in a designated program which must offer, at a minimum, skill training in the following areas:

- Personal hygiene;
- Job search and employment readiness;
- Career counseling and goal planning;
- Locating housing/apartments;
- Budgeting/money management, such as banking, shopping, insurance;
- Meal planning and preparation;
- Housekeeping/housecleaning;
- Utilizing community resources, such as transportation, health care, social services, recreation;
- Self-esteem, relationship, and community living.

Independent Living Stipends must be provided to foster children over the age of 16 who have an established IL goal, or who are deemed to have a goal of IL as defined in 18 NYCRR 430.12(f), and who are otherwise actively participating in an IL program. This financial incentive is available only to those youth participating in the IL program as outlined in the case plan and may be suspended for periods of unplanned inactivity. The stipend is paid on a monthly or more frequent basis, dependent on the youth's needs and capabilities. The allowable stipend amount increases incrementally on a yearly basis according to the youth's age. [Allowable amounts for the IL stipends are found in 18 NYCRR 430.12(f)(2)(b).] A social services district may opt to continue payment of the stipend through a trial discharge period for those youth continuing in the district's custody and who are complying with their IL service plan. Stipends cannot be used to pay for room and board. Payment of the stipend serves a threefold purpose: incentive to participate in the IL program, money management experience, and a means whereby savings can accumulate to assist in the transition to IL. During the trial discharge period, the optional payment of the stipend encourages the continuation of the case management relationship as well as, to a small degree, increasing a youth's financial resources during the critical first months of living independently.

Aftercare Services are those services identified in the case plan as needed after discharge (trial or final) to assist the youth in the transition to IL. Aftercare Services are required throughout the mandated trial discharge period for any youth over the age of 16 who is discharged to IL. Custody of the youth is retained by the social services district and requirements for casework contacts and service
provision apply. At a district's option, and according to the needs of the youth, the trial discharge period may continue until a youth reaches the age of 21. If a youth loses housing during the period of trial discharge, the district must assist the youth to find other appropriate housing or replace the youth into a foster care setting, if necessary. In addition, when custody ceases, the district must maintain supervision of the youth until the youth is 21 years of age. Supervision includes maintaining casework contacts and referring the youth to needed services, including income and housing services, with sufficient follow-up to assist the youth to begin to receive the necessary services.

Room and Board includes expenditures made for a child or youth's living arrangements and generally include housing and food. Room and board expenditures were previously excluded from expenditures that could be reimbursed from Federal IL funds. The CFCIP change allows expenditures for room and board for youth age 18 to 21 upon discharge from care or for youth who have been discharged from foster care but who have not yet attained their twenty-first birthday. This provision is effective for room and board provided on or after December 14, 1999.

This date is absolute as it is based on the date the Federal statute authorizing such reimbursement was signed into law. Room and board expenses incurred before this date can not be claimed for reimbursement under the allocated CFCIP funds. Such payments may be made for youth previously in care as well as for room and board payments that begin at the time of a youth's discharge from care at the age of 18 or older. Social services districts are advised that no more than 30 percent of CFCIP reimbursement may be applied to room and board.

Room and board payments for former foster care youth age 18 to 21 that are made from non-Federal funds may be used for the 20 percent required State and local match, as long as the former foster child is not eligible for payments for such costs from Family Assistance (FA) or Safety Net (SN) support under the Temporary Assistance to Needy Families (TANF) program.

Even when Federal guidelines on room and board are disseminated, the use of CFCIP funds to support a Supervised Independent Living Program (SILP) will be prohibited, as youth placed in SILPs have not been discharged from foster care. Social services districts are also reminded that room and board payments for youth under the age of 18 may not be claimed as an IL expenditure.

IV. ALLOCATION METHODOLOGY

As with the 1998-1999 Title IV-E IL funds allocation, the 1999-2000 CFCIP allocation to social services districts represents 97 percent of the total Federal allocation to New York State, an allocation to districts of $12,708,744. The remainder is being reserved by the Office of Children and
Family Services (OCFS) for the support of IL services for youth in direct care in OCFS-operated facilities and rehabilitative services programs.

The allocation of the funds available for distribution to social services districts consists of two parts. The first is an allocation to districts equal to the same amounts that they were allocated under the 1998-99 Title IV-E 100 percent Federal IL funds allocation in 99 OCFS LCM-14. This allocation constitutes $7,214,471 of the $12,708,744 being distributed to the districts.

The second part of the 1999-2001 allocation ($5,494,273) is based on each social services district's potential IL population, which is defined as youth 14 to 21 in care on December 31, 1999. Each district is allocated an amount equal to its proportion of the potential IL eligible population in relation to the total statewide potential IL eligible population.

The two parts are then added together to get each social services district's Federal Fiscal Year 1999-2000 total CFCIP allocation which appears in the allocations table in ATTACHMENT A.

The population of potentially eligible IL youth was selected for the allocation process as it approximates the likely need for services in each social services district. Previous allocation methodologies incorporated a district's history of expenditures for IL as a factor. However, the recent additions of youth from 14 to 16 to the eligible population, the requirement to provide services to 18 to 21 year olds, and the ability to include room and board expenditures in the IL claims make previous expenditure histories that did not include these factors inappropriate for this allocation. OCFS reserves the right, however, to consider expenditure histories in the future after a trackable baseline that includes the new categories has been established.

V. FUNDS MATCH REQUIREMENT

The Federal statute and a Federal Program Instruction provide that the CFCIP funds are available for only 80 percent of a State's total IL expenditures up to the amount of the Federal CFCIP allocation. State funds available within the Family and Children's Services Block Grant (FCSBG) may serve as part of the match requirement for IL services. The State will apply any available social services district FCSBG funds to comprise the required CFCIP IL funds match. When FCSBG funds are no longer available, the non-Federal share match will have to be comprised of local funds.

In looking for sources for matching funds, social services districts are encouraged to develop collaborations with other local agencies operating programs of services that may support the district's IL activities. The services needs of IL eligible youth require a spectrum of services that cross many agency boundaries. Cross-agency collaboration to utilize services provided by other agencies in the overall services delivery system for
foster care youth with a goal of IL can often be applied toward the required funds match for CFCIP funds reimbursement. This can be accomplished through contracts for relevant services between the social services district and the public or private services provider agency in which the contracting agency contributes funds or in-kind services that would then be counted toward the required CFCIP funds match. The contribution must be clearly defined and designated as such in the contract with the provider agency.

Social services districts are advised that CFCIP funds may not be used by the State (or district) to supplant or replace non-Federal funds for services already being provided for IL. CFCIP funds may be used to continue IL programs or services previously supported with Federal funds under the 100 percent Federal and 50 percent match IL allocations and provisions of prior years. The same type of State/local match funds used for the 50 percent IL funds match may also be used to match CFCIP funds. Contributions to the required match for CFCIP funds must be shown as enhancing or expanding IL services being provided within the social services district.

Some examples of program collaborations that could contribute to both an enhancement of services and resources for the required funds match could include:

- Local agencies funded by the Office of Alcoholism and Substance Abuse Services (OASAS) could provide staff training or consultation to social services district staff regarding substance abuse prevention for adolescents or may be available to facilitate counseling/awareness groups for youth preparing for or actually in an IL situation.

- Community-based alcoholism or substance abuse treatment or prevention programs may be able to include IL youth in local programming.

- Employment training, job preparation, job attainment or job retention programs operated by or funded by the State Department of Labor (DOL) without the use of other Federal funds may be utilized or expanded to specifically include IL youth or youth participating in IL preparation programs.

- Social services districts could contract to make district-provided IL services available to local Youth Bureaus and Youth Bureau-funded programs, such as those for Runaway and Homeless Youth Services, with proceeds from the provision of such services being used as part of the required CFCIP funds match.

Social services districts are not limited to these examples or agencies. Districts may develop and implement other possibilities based on the availability of local resources. Districts are strongly encouraged to contract with their local program agencies, public and private, to explore potential program opportunities. Regional Office staff, supported by OCFS central office staff, are also available to assist districts in identifying potential resources or areas for collaboration.
Districts must be certain that services being provided by community-based organizations, or other public agencies, are not using other Federal funds (including TANF funds) to provide contracted services. Expenditures for services already funded from Federal sources may not be used to meet the required State/local match for CFCIP funds.

Eligible matching contributions may be cash, donated funds, or in-kind contributions of services (including personnel services), equipment, or property. Contributions may be made by third parties. The matching funds may also originate, in whole or in part, from State funding to programs and agencies. General limitations on the Federal funds match requirements include the following:

- No Federal funds may be used for the match;
- Funds used for the IL match may not be used as a concurrent match for any other Federal funds;
- Donated funds and in-kind services received must be used for purposes related to the IL program.

VI. CLAIMS AND REPORTING PROCEDURES

As with previous IL expenditure claiming and reporting, CFCIP expenditures are to be reported on the Schedule RF-4. This schedule is undergoing revision to accommodate changes, including the IL changes made by CFCIP, in reporting requirements. Districts will receive additional instructions when the new Schedule RF-4 is implemented. Until that time, districts will report CFCIP expenditures on the current Schedule RF-4.

IL expenditures are reported by category on lines 1 through 7, column 2. Total IL services expenditures are reported on Line 8, column 2. Line 9 Federal share is claimed at 100 percent of Line 8, column 2. This is entered into the Automated Claiming System (ACS) by social services district staff. However, an adjustment will be made by the Bureau of Financial Services, Office and Temporary and Disability Assistance (OTDA), to claim the Federal Share at 80 percent and State Share at 20 percent. The social services district will be reimbursed for the adjusted Federal Share up to the amount of the district's CFCIP funds allocation and for the State share up to the amount available from Family and Children Services Block Grant (FCSBG) funds.

Social services districts should report all eligible expenditures for IL support and services. Match funds may come from State and local funds not otherwise used for Federal matching, from donated funds, or from in-kind services contributions. Donated funds and in-kind services may originate with third parties. The CFCIP provisions expressly prohibit the use of other Federal funds as matching funds for CFCIP funds.
Social services districts are reminded that expenditures for IL support and services for youth age 14 or 15 who have an IL goal or who are likely to remain in care until age 18 may be claimed only for expenditures made on or after December 14, 1999. Room and board expenditures claims for former foster care youth age 18 to 21 made against Federal (CFCIP) funds may be only for such expenditures made on or after December 14, 1999. Districts may not spend more than 30 percent of CFCIP funds for room and board expenditures for former foster care youth aged 18 to 21.

Schedule RF-4 reports are to be submitted monthly to the Bureau of Financial Services, Office of Temporary and Disability Assistance (OTDA).

VII. Miscellaneous Information

Equipment Purchase Approval Requirements--Any use of Federal CFCIP funds for the purchase of equipment having a unit cost of $5,000 requires prior State and Federal approval. In addition, any EDP-related expenditures of any amount (hardware, software, programming services, etc.) require OCFS approval. Requests for approval of such expenditures must be submitted to:

ATTN: CFCIP Approval Request
William F. Baccaglini, Director
Strategic Planning and Policy Development
Office of Children and Family Services
Capital View Office Park
52 Washington Avenue
Rensselaer, New York 12144-2796.

Training Resources--In implementing local programs for IL services, social services districts are strongly encouraged to use the currently available regionally based IL training resources available from the Independent Living Network (ILN). The ILN offers a variety of training and technical assistance, including the skill-based IL Core Training curriculum for caseworkers and supervisors. The IL Core builds on the basic knowledge and skills that caseworkers receive in the child welfare Common Core training. It teaches them how to apply the interpersonal skills and assessment framework taught in Common Core to help youth in care to develop the ability to live productive and self-sufficient lives upon discharge from care. The IL Core training is available for all social services district staff who work with adolescents.

The IL Core is being enhanced in State Fiscal Year 2001 to include advanced training around IL On-the-Job-Training (OJT) skills development, Preparing Youth for Community Living, Basic Life Skills training, and Education and Employment training. In addition, IL Network members can tailor responses to specific needs.

Social services districts can also access the Independent Living Materials Resource Library on the Internet at www.sbhdo.org.
While training is an important support tool, districts must refer to OCFS regulations, standards, and official releases as their final guidance for program implementation, including CFCIP and IL.

**Assurances Requirements**—Social services districts are advised that OCFS has made certain assurances to the US Department of Health and Human Services (DHHS) through the filing of the CFCIP State Plan on June 29, 2000 (effective July 1, 2000) regarding its planned performance and compliance with regard to CFCIP requirements. A list of these assurances is included as ATTACHMENT B of this memorandum. Social services districts must comply with these assurances as a condition of receiving their IL allocation reimbursement. This includes cooperating with OCFS in any reporting requirements under CFCIP and the establishment and enforcement of anti-fraud provisions and regulations to protect CFCIP and the IL program.

**Foster Parent Training Requirement**—OCFS regulations effective September 27, 2000 require that training provided to foster parents to help foster parents to understand the issues confronting children preparing for IL will, to the extent possible, be coordinated with other elements of the IL program. The regulations also require that, before a child is placed in the home of a foster parent, the authorized agency must prepare the foster parent with appropriate knowledge and skills to provide for the needs of the child and that such preparation must be continued as needed after the placement of the child.

**VIII. Contact Information**

Program questions concerning this memorandum should be directed to the appropriate OCFS Regional Office, via Outlook/Exchange e-mail or by telephone:

- **Buffalo** Linda Brown 89d421 (716) 847-3145
- **Rochester** Linda Kurtz 0fh010 (716) 238-8201
- **Syracuse** Jack Klump 89w005 (315) 423-1200
- **Albany** William McLaughlin av4260 (518) 486-7078
- **Yonkers** Patricia Sheehy am4110 (914) 377-2080
- **New York City** Gail Hallerdin aa0120 (212) 383-1788

For questions regarding financial or claiming/reporting procedures, districts in Regions 1-IV should contact Roland Levy, USERID fms001, telephone 1-800-343-8849, extension 4-7549, or directly at 518-474-7549. In Region V, contact Marvin Gold, USERID 0fm170, at 212-383-1733.

For information regarding training available from the IL Network, contact:

Regions 1 and 2:

SUC Buffalo, Center for Development of Human Resources
Meg Brin  E-mail: MegB@bsc-cdhs.org  716-796-2086
Regions 3 and 4:

SUNY Albany, Professional Development Program
Beth Case   E-mail: Bcase@pdp.albany.edu   518-442-5136

Region 5

SUNY Stony Brook, Child Welfare Training Program
Bob Marmo   E-mail: Bmarmo@ssw.hsc.sunysb/ecu   631-444-7996

Region 6

South Bronx Human Development Organization
Karolyn Gould   E-mail: Krgould@aol.com   718-295-5501

William F. Baccaglini
Director
Strategic Planning
and Policy Development
DISTRICT ALLOCATIONS

CHAFEE FOSTER CARE INDEPENDENCE PROGRAM (CFCIP) FUNDS

10/1/99 to 9/30/01

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The allocations in this table may be claimed to provide reimbursement of 80 percent of a social services district's total IL expenditures, up to the total amount of the allocation. The remaining 20 percent expenditure requires State and local expenditures to match the use of the allocated funds. To the extent available, Family and Children's Services Block Grant (FCSBG) funds may be used for the match. Remaining expenditures after the application of FCSBG funds must be made from local funds/resources subject to the matching funds requirements noted in Section V of this memorandum.
CHAFFEE FOSTER CARE INDEPENDENCE PROGRAM (CFCIP) ASSURANCES

The following certifications and assurances have been made by OCFS regarding the CFCIP implementation in New York State and are applicable to all local districts using CFCIP funds for IL services.

1. Assistance and services will be provided to youth that have left foster care because they have attained 18 years of age but who have not attained 21 years of age.

2. Not more than 30 percent of the amounts allocated for CFCIP funds will be expended for room and board for youth who have left care because they have attained 18 years of age and have not attained 21 years of age.

3. None of the amounts allocated will be expended for room and board for any child who has not attained 18 years of age.

4. Programs to provide training to help foster parents, adoptive parents, workers in group homes and case managers understand and address the issues confronting adolescents preparing for IL will use training funds from the Federal Foster Care and Assistance Program (Title IV-E) and will, to the extent possible, coordinate such training with the IL program(s) conducted for adolescents.

5. Foster parents and prospective foster parents will be adequately prepared with the appropriate knowledge and skills to provide for the needs of the child or youth before a child or youth is placed with the foster parent(s) and such preparation will be continued, as necessary, after the placement of a child.

6. In preparing the IL plan, public and private organizations having an interest in IL services or in services for adolescents will be consulted widely.

7. Every effort will be made to see that programs receiving CFCIP funds will be coordinated with other Federal and State programs for youth (including transitional living youth projects and programs funded under the Juvenile Justice and Delinquency Prevention Act of 1974, abstinence education programs, local housing programs, programs for disabled youth including sheltered workshops, and school-to-work programs).

8. Adolescents participating in CFCIP-funded programs will be encouraged to participate directly in designing their own program activities to prepare them for independent living and will be required to accept personal responsibility for living up to their part of the program.

9. Program participants will be assured fair and equitable treatment.
10. CFCIP funds will be used to supplement, and not supplant, existing programs providing support and services to transition to Independent Living.

11. Where appropriate, Indian tribes will be consulted about the programs carried out under the IL plan, including efforts to coordinate IL programming with activities by the tribes with benefits and services under the IL plan made available to Indian youth on the same basis as other youth.

12. Program standards and procedures to prevent fraud and abuse in programs carried out under the IL plan will be established and will be enforced.