

TEXAS WORKFORCE COMMISSION

Foster Care Guide



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Definitions

- **Allocable Costs:** A cost is allocable to a particular award or other cost objective if the goods or services involved are chargeable or assignable to that award or cost objective in accordance with relative benefits received. This standard is met if the cost:
 - is incurred specifically for the award;
 - benefits both the award and other work of the entity and can be distributed in proportions that may be approximated using reasonable methods; and
 - is necessary to the overall operation of the entity and is assignable in part to the award in accordance with the cost principles in UG and UGMS.
- **Computing Device:** Machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or "peripherals") for printing, transmitting and receiving, and storing electronic information as defined in 2 CFR §200.20. Examples include, but are not limited to, desktops, laptops, all-in-ones, tablets, and 2-in-1s. A computing device that meets the definition of Equipment is equipment.
- **Equipment:** Tangible, personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost of \$5,000 or more. Acquisition cost is the net invoice unit price of the property, including the cost of modifications, attachments, accessories, or auxiliary apparatus necessary to make the property usable for its intended purpose.
- **On-the-Job Training:** Defined by WIOA as training by an employer that is provided to a paid participant while the participant is engaged in productive work in a job that (A) provides knowledge or skills essential to the full and adequate performance of the job; (B) is made available through a program that provides reimbursement to the employer of up to 50 percent of the wage rate of the participant, except as provided in section 134(c)(3)(H), for the extraordinary costs of providing the training and additional supervision related to the training; and (C) is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate.
- **Reasonable Costs:** A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent individual under the circumstances prevailing at the time the decision was made to incur the cost. The question of reasonableness is particularly important when the entity is predominantly federally funded. In determining reasonableness of a given cost, consideration must be given to:

- whether the cost is of a type generally recognized as ordinary and necessary for the operation of the entity or the proper and efficient performance of the award;
 - the restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; federal, state, local, tribal, and other laws and regulations; and terms and conditions of the award;
 - market prices for comparable goods or services for the geographic area;
 - whether the individual concerned acted with prudence in the circumstances regarding their responsibilities to the entity, its employees, where applicable, its students or membership, the public at large, and the federal government; and
 - whether the entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the award's cost.
- Support Services: Ancillary services provided by an organization or its partner service providers and determined to be necessary, based on the assessment of the individual, to improve foster youths' abilities to find and obtain meaningful employment. Examples of support services include transportation, child care, dependent care, and housing.

Foster Care Guide

Purpose of this Guide

The Texas Workforce Commission (TWC) is committed to promoting and supporting a workforce system that creates value and offers employers, individuals, and communities the opportunity to achieve and sustain economic prosperity. While many services are offered by the foster care system to youth as they approach adulthood, youth who were in foster care during their teenage years or at the time they reached adulthood may still need additional support. This guide was developed to provide TWC grant recipients and the 28 Local Workforce Development Boards (Boards) with general knowledge regarding the foster care system in Texas and resources for use in day-to-day work with foster youth.

Foster Care in Texas

When children cannot live safely at home and no appropriate noncustodial parent, relative, or close family friend is willing and able to care for them with the consent of the child’s guardian, the court can give temporary legal possession to the Texas Department of Family and Protective Services (DFPS)—Child Protective Services (CPS). CPS places these children in temporary foster care. Foster care settings include a relative or close family friend, foster family homes, foster family group homes, residential group care facilities, and facilities overseen by another state agency. Foster care is meant to be temporary until a permanent living arrangement is found. CPS strives to ensure stability and normalcy for children in foster care; however, because of various factors, children in foster care might have to change placements several times. Youth might be in foster care for one day or until they turn 21 years of age. For youth who are in foster care as they approach adulthood, numerous programs exist to assist them in the transition.

Trauma Informed Practice

Foster youth are more likely to experience traumatic incidents than the general populace, as they are at a higher risk for physical, sexual, and psychological abuse as well as neglect during childhood than children who are raised in traditional settings. It is therefore beneficial for professionals who work with foster youth, whether they have direct contact with foster youth or simply work in an organization that does, to become what is termed “trauma informed” in their professional practices.

Trauma Informed Practice is an organizational structure that involves understanding, recognizing, and responding to the effects of all types of trauma. It emphasizes physical, psychological, and emotional safety for both participants and providers, and it helps survivors of trauma build a sense of agency, control, and empowerment in their lives. Trauma informed care practices have been widely adopted in social services agencies and are becoming more prevalent in schools (both at the K–12 and higher education levels) and medical arenas.

According to the Trauma Informed Care project, becoming trauma informed means recognizing that individuals often have many different types of trauma in their lives. Incorporating that definition into organizational practices requires commitment and willingness to adapt and learn at both the organizational and employee levels, as it is possible for trauma survivors to be retraumatized even by well-meaning service providers.

To effectively implement trauma informed practices, the National Center on Domestic Violence, Trauma & Mental Health (NCDVTMH) recommends reflection, planning, and/or training in the following focus areas:

- Organizational Commitment and Infrastructure
- Staff Support and Supervision
- Physical, Sensory, and Relationship Environment
- Intake Processes
- Programs and Services
- Community Partnerships

NCDVTMH also recommends substantial organizational self-evaluation before implementing trauma informed practices, as the process is most effective when all staff members have an opportunity to involve themselves from the beginning.

Because of the diversity of the foster youth population in Texas, it is important to keep in mind that services cannot be considered trauma informed unless they are also culturally responsive and fully accessible. An agency should consider:

- whether organizational and individual practices ensure the inclusion of individuals with disabilities including deaf individuals (accessibility); and
- whether organizational and individual practices exercise cultural responsiveness to “affirm and are inclusive of the many aspects of all staff, leadership, board members’, and participants’ identities, including identity related to race, class, age, disability, language, sexual orientation, gender, gender expression, culture, ethnicity, religion,

spirituality, mental health, employment, housing stability, family and important relationships, recovery, use of substances, military involvement, immigration or documentation status, access to education, and history with the criminal justice system.” ([Tools for Transformation: Becoming Accessible, Culturally Responsive, and Trauma-Informed Organizations](#), page 7)

Becoming trauma informed involves extensive and specific training and touches on a myriad of practices, from how to speak to a potentially traumatized individual to how the furnishings in a room should be arranged to minimize the potential for retraumatization. The following resources, among many others, can guide organizations that want to adopt trauma informed practices:

- [The Trauma Informed Care Project](#)
(<http://www.traumainformedcareproject.org/>)
- [The National Center on Domestic Violence, Trauma, and Mental Health](#)
(<http://www.nationalcenterdvtraumamh.org/publications-products/tools-for-transformation-becoming-accessible-culturally-responsive-and-trauma-informed-organizations-an-organizational-reflection-toolkit/>)
- [Texas Higher Education Foster Care Liaisons](#)
(<https://txicfw.socialwork.utexas.edu/wp-content/uploads/2017/06/HE-Liaisons-Guide-FINAL.pdf>)

Engaging with Foster Youth

A significant and often unexpected challenge when working with foster youth is simply to identify them. While some youth will self-identify, others do not identify themselves directly. Many foster youths avoid discussing their foster care experience to avoid stigma and negative reactions among peers and adults they meet. It should therefore be part of the services intake process to notify new participants that services are available specifically for foster youth.

Once a foster youth is identified, it is important to keep the foster care experience in proper perspective. Because the workforce system entitles foster youth to priority services, there is a risk of overemphasizing their identity as foster youth at the expense of other aspects of their experience and situation. Excessive focus on the foster care experience might be uncomfortable for the youth and also might lead to ignoring other programs and services that the youth might be eligible for by reason of gender, age, and life experiences beyond their history in foster care. Foster youth should

be directed to programs that go beyond foster-care-oriented programs. As with every participant, an individualized plan should be developed that examines the totality of the youth's experiences.

Referring Foster Youth

Because of the diversity of services offered by various organizations, it is likely that a foster youth will benefit from being referred to specialist services (either internal or external) that focus on the specific barriers that the youth is facing, such as homelessness, lack of high school diploma, or health concerns. Handoffs and referrals are junctures where service delivery staff contact with the youth may be lost. Many youths who are seeking one service may be experiencing multiple needs. Progress in resolving one need may be hindered by concurrent attempts to resolve other needs, or by leaving other needs unresolved. For example, youth experiencing unemployment and homelessness, and who also lack a high school diploma, frequently cannot benefit from a program that addresses only one factor, since homelessness can make both attending school and maintaining employment challenging. However, without employment to pay for basic needs, finding a stable living environment or being able to focus on school can be difficult. Youth facing multiple needs are significantly more likely not to follow up independently and frequently need additional support simply to stay engaged in the process. Some best practices for managing referrals are as follows:

- Establish a "warm" handoff, such as walking a youth to the next office and introducing him or her to the individual to whom you are referring the youth or calling the individual and introducing him or her over the phone to the youth can make the referral more likely to succeed.
- Set realistic expectations and meet those expectations. Sometimes, a youth must wait for services or intake. These waiting periods are times when it is easy to lose contact with youth; establishing realistic expectations for waiting periods helps establish trust and encourage follow-up.
- Keep contact open, even during waiting periods. Reach out to foster youth regularly. Even when there is no news to give the youth, continued contact with service delivery staff can help make him or her feel connected and comfortable reaching out with questions or concerns.

Texas Workforce Commission/Local Workforce Development Board/Texas Department of Family and Protective Services Partnership

TWC and DFPS have entered into a Memorandum of Understanding (MOU), agreeing to support partnerships among Boards, Regional DFPS offices, and TWC and DFPS contractors. Boards and DFPS regional offices have jointly developed and entered into agreements that address the unique challenges that face foster youth who are transitioning to adulthood, including improving employment outcomes for these youth. Through an MOU, DFPS and the Boards collaborate to:

- further the objectives of the DFPS Preparation for Adult Living (PAL) program;
- ensure that services are prioritized and targeted to meet the needs of current and former foster youth; and
- refer, as appropriate, foster youth who need housing to short-term housing.

DFPS staff, caregivers, and PAL contractors refer youth age 16 and older to local Texas Workforce Solutions Offices for job search and job readiness assistance, career exploration, and employment and training services. Each Board has a designated point of contact so that staff and youth can access assistance and services. Youth are encouraged to use the TWC online job matching system, WorkInTexas.com, to search for jobs, create a résumé, and submit applications for employment.

TWC's Labor Market and Career Information department supports a website, [Texas Career Check](https://texascareercheck.com/) (<https://texascareercheck.com/>), to facilitate career and education exploration by foster youth. The website provides information on occupation trends, occupational descriptions (including occupations in the military), and information about programs of study and a high school graduation plan. The website also offers an online interest profiler to help youth determine their interests and goals with respect to school and work.

As required in [WD Letter 38-11, Change 1](#), issued on December 20, 2011, and titled "Local Memoranda of Understanding with the Texas Department of Family and Protective Services to Serve Foster Youth—Update," Boards shall also establish a written MOU with the foster youth transition center (transition center) in the local workforce development area where the Workforce Solutions Office provides services. The MOU facilitates participation in the Temporary Assistance for Needy Families (TANF) Foster Youth Project sponsored by TWC with the funding provided to the foster

youth transition centers. The agreement establishes a cooperative and mutually beneficial relationship that furthers the goals of both parties, and it ensures that services are targeted toward youth who are:

- between the ages of 16 and 25 at the time of enrollment
- currently in foster care, aging out of foster care, formerly in foster care but are still in need of assistance; and
- foster youth on probation or parole, or who have been released from juvenile correction.

Workforce Solutions Office staff must:

- identify staff members to coordinate with the transition center and serve as a liaison for the TANF Foster Youth Project;
- provide opportunities for youth to attend workshops, job fairs, use online resources at Workforce Solutions Offices and/or visit with Workforce Solutions Office staff to receive guidance on job searches, job retention, current labor market information, and employment trends; and
- use the transition center's referral form to refer foster youth who are not receiving transition center services.

Workforce Solutions Office staff must work with transition center staff to:

- ensure collaborative participation on training activities, outreach events, and community service projects;
- identify and involve other community partners to promote understanding of systems that affect client services;
- provide personally identifiable information (PII) on participants being provided with coenrolled services for an efficient workforce development system; and
- participate in joint program meetings to discuss program progress and outcomes on participants.

To serve foster youth in their workforce areas, Boards may provide employment and training services using a variety of funding sources, including the following:

- Temporary Assistance for Needy Families (TANF/Choices)
- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)
- Workforce Innovation and Opportunity Act (WIOA) Youth
- WIOA Adult

- Employment Services¹

Boards must ensure that all programmatic requirements, including eligibility and the provision of allowable program-specific services, are followed for each program listed above if funding is used to provide employment and training services.

Priority of Service for Foster Youth

Texas Family Code §264.121 directs that workforce services be prioritized and targeted to meet the unique needs of foster youth.

Boards must ensure that the following definitions are used when implementing priority of service for eligible foster youth:

- Current Foster Youth—A youth, age 14 or older, who is receiving substitute care services under the managing conservatorship of the DFPS, including youth residing in private foster homes, group homes, residential treatment centers, juvenile correctional institutions, and relative care
- Former Foster Youth—A youth up to 21 years of age, who formerly was under the managing conservatorship of DFPS, until:
 - a court transferred the conservatorship;
 - the youth was legally emancipated—the youth’s minority status was removed by a court; or
 - the youth attained 18 years of age.

Boards must ensure that written copies of local priority of service policies are maintained at all service delivery points and, to the extent practicable, posted in a way that makes it possible for the public to access them easily.

Priority Order

Boards must ensure that:

- eligible foster youth receive priority over all other equally qualified individuals—except eligible veterans—in the receipt of federal- and state-funded services; and,
- workforce services are prioritized and targeted for:
 - youth transitioning out of the foster care system; and

¹ TWC WD Letter 31-04, issued August 25, 2004, and entitled “Serving Foster Care Youth” and US Department of Labor Training and Employment Guidance Letter No. 3-04, issued July 16, 2004, and entitled “The Employment and Training Administration’s (ETA’s) New Strategic Vision for the Delivery of Youth Services Under the Workforce Investment Act.”

- former foster youth.

Priority of Service for Support Services

To ensure that eligible foster youth receive priority over all other equally qualified individuals—except eligible veterans—in the receipt of workforce services, they must have access to the support services they need (for example, child care and transportation).

Priority of Service for Child Care

Boards must be aware that the priority for child care services for eligible foster youth is contingent upon the availability of TWC child care funds. Boards with a waiting list for TWC-funded child care services must not discontinue care for a child currently enrolled in child care services in order to serve a child in a priority group.

Boards must be aware that TWC’s Chapter 809 Child Care Services rule §809.43(a)(1) establishes that the following populations are assured child care services and are not subject to the child care waiting list:

- Choices child care as referenced in §809.45;
- TANF Applicant child care as referenced in §809.46; and
- SNAP E&T child care as referenced in §809.47.

Boards must also give priority to former Choices child care recipients whose TANF benefits were denied or who voluntarily ended within the last 12 months due to employment, timing out of benefits, or an earnings increase and who are eligible for at-risk care.

Boards must be aware that §809.43(a)(2) provides that the following populations are served subject to the availability of funds, and include, in order of priority:

1. Children who need to receive protective services child care as referenced in §809.49;
2. Children of a qualified veteran or qualified spouse as defined in TWC’s Local Workforce Development Boards rule §801.23;
3. Children of eligible foster youth as defined in §801.23;
4. Children experiencing homelessness as defined in §809.2 and described in §809.52;
5. Children of parents on military deployment as defined in §809.2 whose parents are unable to enroll in military-funded child care assistance programs;
6. Children of teen parents as defined in §809.2; and

7. Children with disabilities as defined in §809.2.

Boards with a waiting list for TWC-funded child care services must continue to serve enrolled children through the end of the family's applicable 12-month eligibility period as required by TWC Child Care Services rule §809.54, Continuity of Care.

Data Collection

Boards must document the receipt of staff-assisted workforce services in The Workforce Information System of Texas (TWIST) or in WorkInTexas.com.

Workforce Innovation and Opportunity Act (WIOA) Services

Workforce Solutions Office staff members are encouraged to review TWC's WIOA Guidelines to determine whether foster youth are eligible for the WIOA Youth program. WIOA-funded activities for youth encourage the establishment of educational and employment goals and facilitate progress toward those goals. Youth can use services available through WIOA, which include, but are not limited to:

- tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies;
- alternative secondary school services, or dropout recovery services, as appropriate;
- paid and unpaid work experiences such as:
 - summer employment opportunities and other employment opportunities available throughout the school year;
 - pre-apprenticeship programs (TWC also supports Registered Apprenticeship programs. For more information see the Apprenticeship web page at <https://twc.texas.gov/programs/apprenticeship-program-overview>.);
 - internships and job shadowing, and
 - on-the-job training opportunities, as defined in WIOA §3(44).
- occupational skills training, if the Board determines that the programs meet the quality criteria described in WIOA §123²;
- education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;

² 113th Congress, 2nd Session, HR 803 §123. Eligible providers of youth workforce investment activities.

- leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors;
- support services, as defined in WIOA §3(59);
- adult mentoring for a duration of at least 12 months that may occur both during and after program participation;
- follow-up services for not fewer than 12 months after the completion of the participation;
- comprehensive guidance and counseling, as appropriate to the needs of the individual youth;
- financial literacy education;
- entrepreneurial skills training;
- services that include labor market and employment information about in-demand industry sectors; and
- activities that help youth prepare for and transition to postsecondary education and training (TWC also supports Adult Education and Literacy (AEL) programs. For more information see the AEL web page at <https://twc.texas.gov/students/adult-education-literacy-teachers-providers>).

Boards have the discretion to determine which program services a youth participant receives based on each participant’s objective assessment and individual service strategy. Boards are not required to provide every program service to all youth participants.

Incentives for Youth Participating in WIOA Youth Services

Incentive payments are allowed for youth participants if the incentives are connected to recognition of achievement of milestones in a program directly tied to education, training, or the successful completion of a work experience that occurs during program participation.³ Refer to WD Letter 15-19, issued May 21, 2019, and titled “Guidelines for the Provision of Incentives for Workforce Innovation and Opportunity Act Youth and Choices, including NCP Choices Participants,” for more details on incentive payments for participants.

Boards must develop guidelines and strategies that align with the local program’s organizational policies governing the award of incentives and must ensure that WIOA-funded incentive payments are:

³20 CFR §681.640 Incentive Payments to Youth Participants; 2 CFR Part 200, Subpart E, §200.40–§200.475 Cost Principles.

- tied to the goal of the specific program;
- outlined in writing before the commencement of the program;
- aligned with the local program’s organizational policies;
- based on the availability of funds; and
- provided in accordance with the Cost Principles contained in 2 CFR Part 200 (Uniform Guidance).

Federal funds must not be spent on entertainment costs. Therefore, incentives must not include movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment.

Incentive payments for youth participants must be considered on a case-by-case basis. Such payments are not guaranteed, and participants are not entitled to receive them. Incentives may be provided to both in-school youth and out-of-school youth if they comply with the requirements of 20 CFR §681.640.

Examples of an achievement milestone may include:

- attainment of a high school diploma or a Certificate of High School Equivalency;
- completion of an industry-recognized certificate, credential, or occupational skills training;
- receipt of an associate’s or bachelor’s degree; or
- successful completion of a work experience.

While incentives may be provided for successful completion of a work experience, Boards must ensure that incentives are not tied to the “academic or occupational education component” of a work experience.

Note: WIOA funds may not be used to fund incentives for completing job readiness training or classes; however, Boards may leverage private funds for incentives that WIOA may not fund.

Workforce Board Foster Youth Liaisons

Much like independent school districts and public institutions of higher education in Texas, Boards must have an appointed foster youth liaison to ensure that foster youth in their region are receiving the services and priority of services for which they are eligible under TWC’s rules for Workforce Board services delivery. A Board’s foster youth liaison is responsible for ensuring that:

- eligible foster youth are given access to workforce services to help meet their employment, education, and training needs to transition to independent living, as set forth in Texas Family Code §264.121; and,
- foster youth are informed of:
 - their right to priority of service;
 - the full array of employment, training, and placement services available under 33 priorities of service; and
 - all applicable eligibility requirements for those programs and services.

Eligible foster youth receive priority over all other equally qualified individuals—except eligible veterans—in the receipt of federal- or state-funded services in accordance with Texas Family Code §264.121(3).

Foster Youth Transition Centers

TWC began funding transition centers in 2008, funding four centers statewide. In Fiscal Year 2013 (FY'13), this funding was expanded to 10 additional transition centers, recognized by DFPS. In FY'17, TWC continued this support and approved funding for 18 transition centers, shown on the map below.

readiness and job search assistance, career exploration, higher education enrollment assistance, food and housing assistance, and mentoring. Additionally, other community partners provide services such as counseling for substance abuse and mental health issues, mentoring services, and leadership training.

Transition centers provide colocation opportunities for local partners such as local Workforce Solutions staff, TWC-funded workforce advocates, and colleges and universities to help them jointly serve the diverse needs of the youth in one location. The 18 transition centers are independently funded, operated, and supported by partnerships between DFPS, the DFPS providers, community partners, and TWC. A list of these transition centers and their contact information is available at the DFPS [Transitions Centers](#) contacts page at

http://www.dfps.state.tx.us/Child_Protection/Youth_and_Young_Adults/Transitional_Living/transition_centers.asp.

Transition centers receive a portion of their funding through a grant from TWC to provide employment, training, educational support, and other services to help foster youth achieve their workforce goals. Transition centers must determine participant eligibility before they provide services. Youth who are ages 16 through 25 are eligible if they are enrolled at a transition center and:

- currently in foster care;
- aging out of foster care;
- formerly in foster care but still in need of assistance;
- foster youth on probation or parole; or
- foster youth released from juvenile correctional facilities.

Failure to determine eligibility, document eligibility, or maintain the required files for all enrolled participants may result in disallowed costs and the subsequent requirement to repay grant funds, in accordance with the terms and conditions of their grant award.

Transition centers must ensure that foster youth or their guardians sign confidentiality disclosures to allow information, including Social Security numbers, to be used for reporting and tracking purposes. Documentation must be maintained as required by the grant award.

Transition centers' funding is provided at the discretion of the Commission based on the availability of TANF funds. The Commission may consider prior grant performance at the time of the funding decision.

Transition Center MOUs with Boards

Transition centers must establish a written MOU with Boards that are in the workforce area where the transition center provides services. The MOU must include provisions for the following:

- Coordinating a referral process to ensure that current and former foster youth are identified and referred for workforce services
- Prioritizing employment, training, and support services for current and former foster youth
- Ensuring that the Board communicates to workforce contractors the terms and conditions of the MOU and provides guidance regarding compliance with the MOU
- Identifying cross-training opportunities with local Board staff, Workforce Solutions Office staff, and other community partners to promote the understanding of policies, procedures, and automation systems that affect foster youth
- Securing the confidentiality of all records and other client information (Personally Identifiable Information (PII)) in accordance with state and federal law
- Sharing program and case information that is necessary to ensure efficient and quality client services
- Providing access to current labor market information that identifies job vacancies, the skills necessary for high-growth and high-demand jobs, and information on employment trends

Workforce Advocates

In addition to the requirements listed above, once TWC funding is accepted, transition centers must create a workforce advocate role. The workforce advocate must have a general knowledge of workforce services; an understanding of the array of local services available to support foster youth; a working knowledge of the pertinent policies, rules, and procedures of DFPS, TWC, and other entities providing services to foster youth; and the ability to serve on youth councils and/or task groups. The workforce advocate must:

- be a full-time equivalent employee without other significant responsibilities that are not part of the workforce advocate role;
- lead or colead direct services provided by the transition center to foster youth, including:
 - one-to-one individualized assistance;
 - a needs assessment;

- referrals to Workforce Solutions Offices to provide:
 - job searches;
 - job referrals;
 - career assessments;
 - mentoring;
 - identification of growth occupations in the local labor market;
 - job skills training; and
 - job placement; and
- serve as the primary coordinator with Workforce Solutions Offices, local businesses and training providers, local public-school systems, alternative schools, and community and four-year colleges for workforce, employment, training, and education services for foster youth.

Transition Center Allowable and Unallowable Costs

Cost Overview:

Pursuant to the cost principles in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), all costs must be necessary and reasonable for performance of the award, and allocable thereto in accordance with Uniform Guidance and Uniform Grant Management Standards (UGMS) cost principles. These funding rules are designed to support the transition centers' mission of providing to foster youth who are eligible for and enrolled in career services through the transition centers the professional and career skills necessary to achieve self-sufficiency. Examples of costs commonly identified as allowable and unallowable expenditures for this initiative are listed below. If grantees have questions about allowable costs, they should contact their grant manager to discuss their concerns before proceeding with expenditures or budget adjustments.

Additionally, the cost principles in Uniform Guidance and UGMS address the allowability of selected items of cost. Failure to mention an item of cost in this guide or in Uniform Guidance and UGMS is not intended to imply that the cost is either allowable or unallowable. Determinations about allowability in each case should be based on:

- the treatment provided for similar or related items of cost; and
- the basic considerations for the allowability of costs set forth in Uniform Guidance and UGMS.

Refer to the Definitions section of this document for a definition of allocable costs and reasonable costs.

Allowable Costs

This program imposes an administrative cost-limit on grant expenditures. Examples of allowable administrative and program costs are given below. The classification of administrative costs is based on the TANF definition of administrative costs at 45 CFR §263.0(b).

Administrative Costs (capped at 5 percent of total grant expenditures) may include, but are not limited to, an allocable share of the following costs to the extent that the costs are necessary and reasonable for the performance of the award, as follows:

- Allocable share of insurance required for the general administration of the grant award, such as:
 - liability;
 - property insurance;
 - flood insurance (if applicable);
 - commercial auto for entity-owned vehicles (to the extent the vehicles benefit the program);
 - crime and/or fidelity bond; and
 - workers' compensation
- Accounting and bookkeeping
- Procurement activities
- Audit services
- Computing devices associated with administrative activities. The purchase of computing devices requires approval in advance and may be considered for staff members who work on administrative activities in support of this program. TWC recognizes the limited life expectancy of computing devices but will consider replacement not more often than every three years except in emergency circumstances.
- Office supplies (such as copier paper, folders, pens, pencils, markers, staplers, scissors, and the like), postage, utilities, and rental of office space associated with administrative functions
- Staff travel costs, capped at \$3,000 for the total travel budget for the grant period, unless the grantee justifies a higher amount

Program Costs may include an allocable share of the following costs to the extent that the costs are necessary and reasonable for the performance of the award, as follows:

- Workforce advocate (must be a full-time equivalent position with 100 percent of the work time devoted to this position), and other program staff specified in an approved transition center project plan
- Office supplies (such as copier paper, folders, pens, pencils, markers, staplers, scissors, and the like), postage, utilities, and rental of office space associated with program activities

- Site visits and job fairs (these expenditures will require justification and prior approval)
- Incentives consistent with transition center policy per WD Letter 15-19, issued May 21, 2019, and entitled "Guidelines for the Provision of Incentives for Workforce Innovation and Opportunity Act Youth and Choices, including NCP Choices Participants" up to \$300 per registered youth, per year
- Computing devices associated with program activities. The purchase of computing devices requires approval in advance and may be considered for staff members who work on program activities in support of this program. TWC recognizes the limited life expectancy of computing devices but will consider replacement not more often than every three years except in emergency circumstances.
- Driver's education and licensing fees as related to supporting a participant in meeting training and employment goals
- Staff travel costs, capped at \$3,000 for the total travel budget for the grant period, unless the transition center territory justifies a higher amount
- Contractual services
- In-state conference registration fees, once annually for the workforce advocate and transition center director to attend the TWC Foster Youth Annual Conference
- In-state professional development services for the workforce advocate and transition center director
- Communication and facility costs associated with programmatic activities that may include, but are not limited to, the following:
 - Phone
 - Internet
 - Utilities (Center)
 - Rent (Center)
- Other monthly costs associated with programmatic activities that may include, but are not limited to, the following:
 - Equipment leases
 - Software support and licensing
 - Janitorial services
 - Security services
- Support services consistent with the transition center's approved needs-related policy that are necessary to enable an individual to participate in activities authorized under this grant on a one-time or emergency basis as outlined in the approved transition center project plan, such as:
 - Housing assistance
 - Rental assistance
 - Utilities
 - Appliances and furniture

- Transportation
- Incidental child care, as follows:
 - Foster youth eligible for and enrolled in transition center services are eligible for incidental child care payments to support activities related to employment attainment such as job interviews, drug tests, certification examinations, or other activities outlined in the transition center’s project plan. These payments must be directed toward a child care provider that is licensed and registered with the State of Texas or a relative listed as a guardian with DFPS.
 - Upon acquisition of employment, foster youth will be referred to child care services as outlined in Child Care Services Guide B-400: Priority for Child Care Services.
- Dependent care
- Needs-related payments

Unallowable Costs

The following are unallowable costs:

- Case management services directly related to PAL services
- Snacks and food items for youth events sponsored by the transition center (may be allowable in certain circumstances with prior approval from TWC)
- Equipment, except as specified under Allowable Costs as relates to computing devices
- Purchase of real property or vehicles
- Additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations, or alterations to buildings, which may include, but are not limited to, the following:
 - Replacing security systems
 - Painting
 - Doors

Additionally, costs—including support services—must conform to the program requirements and cost principles set forth in the following:

- [TANF program law and regulations](#)
- [TANF State Plan](#)
- [Office of Management and Budget \(OMB\) “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards”](#) (Uniform Guidance) (2 CFR Part 200) and the Texas Department of Health and Human Services implementing regulations at 2 CFR Part 300 and 45 CFR Part 75
- [Texas Uniform Grant Management Standards \(UGMS\)](#)
- [TWC Financial Manual for Grants and Contracts \(FMGC\)](#)
- Terms and Conditions of the Grant Award (refer to current grant)

- [TWC Directives](#)

Texas Department of Family and Protective Services

DFPS works with communities to promote safe and healthy families and protect children and vulnerable adults from abuse, neglect, and exploitation. This is accomplished through investigations, services and referrals, and prevention programs. CPS is responsible for children once they are placed in foster care. CPS offers specific services for youth in foster care who are approaching adulthood.

Transitional Living Services (TLS), programs, and benefits help smooth the transition for adulthood for foster youth and young adults and helps them identify and achieve long-term education, career, and life goals. TLS begin at age 14 and may continue until age 23. TLS programs are committed to engaging youth in all aspects of the work; engaging communities and building strong community partnerships; collaborating to improve systems, programs, and services; and identifying best practices. TLS programs and services include the following:

- Experiential Life Skills Training for youth ages 14 and older
- Children’s Bill of Rights
- Foster youth transition centers
- PAL
- Youth leadership and development activities, including regional and statewide teen conferences and regional and statewide youth leadership councils
- Texas Youth Hotline
- Texas Youth Connection
- Postsecondary education resources and information
- Circles of Support and transition plan meetings
- Personal documents at age 16 and prior to turning 18 (Youth Transition Portfolios, medical power of attorney, and requests for case records)
- Medical coverage (Transitional Medicaid or STAR Health and Former Foster Care in Higher Education (FFCHE) program)
- Extended foster care for individuals up to age 22 to complete high school or up to age 21 to complete college or vocational and technical training. Extended foster care youth must work at least 80 hours a month and attend programs to remove barriers to employment or have a disability determination that demonstrates that they are not able to complete education or employment-related goals.
- Trial independence period for young adults after they have aged out of care at age 18

- Return to extended foster care to complete educational and employment goals
- Supervised independent living programs for young adults to live independently while in extended foster care

For youth and young adults in foster care, life skills training starts at age 14. This includes learning how to grocery shop, prepare meals, eat healthfully, use public transportation, do basic household tasks, and complete driver's education. The training also includes financial topics such as money management, maintaining a checking account, understanding credit scores, responsible use of credit cards and other types of loans, and other personal finance information. The transition planning process also begins at age 14 and helps prepare youth and young adults to leave foster care and become successful adults.

To improve the TLS program, DFPS has developed transitional living services planning that is more comprehensive than previous planning. The required elements of TLS plans include efforts to further individualize independent living skills assessments and transition planning, provide online life-skills training options, improve services to youth with disabilities, identify compassionate and responsible adults to form lasting relationships with youth and young adults, and provide experiential learning opportunities.

Additional Resources Available for Foster Youth

[Resources available for foster youth who need financial support during their transition:](#)

- Transitional living allowance (up to \$1,000 to be distributed in increments not to exceed \$500 per month based on availability) for eligible young adults in or formerly in foster care.
- Based on need, young adults may receive aftercare room and board assistance (up to \$500 per month with a total cap of \$3,000 in accumulated payments) for eligible young adults in or formerly in foster care.

[Resources available for foster youth who need personal records or a driver's license:](#)

- Driver's license fees are waived for youth in DFPS temporary or permanent managing conservatorship and for young adults at least age 18 but younger than age 21 who reside in a DFPS-paid foster care placement.
- Credit Reports—Youth ages 14 through 18 in the conservatorship of DFPS are informed that a credit report is run annually until the youth is

discharged from DFPS care. Additionally, the caseworker will explain the credit report and the importance of maintaining good credit.

- Provision of Personal Documents/Records—Youth in DFPS conservatorship on or before their 16th birthday must be provided with the original document or a copy of their birth certificate, Social Security card or replacement Social Security card, and a personal identification certificate or card issued by the Texas Department of Public Safety (DPS). Once youth turn 18 and age out of DFPS foster care, they also will receive a copy of their immunization records; information contained in their health passport; proof of enrollment in Medicaid, if appropriate; medical power of attorney information; the "Almost 18?" letter⁴; and their Youth Transition Portfolio⁵.

Resources available for foster youth seeking medical care:

- Medical Consent—A youth in foster care who is at least 16 years old may consent to receive medical care if the court with continuing jurisdiction determines that the youth has the capacity to consent to medical care.
- Former Foster Care Children (FFCC) Program. The FFCC program provides continuous health care coverage through age 25 to eligible young adults who age out of the foster care system and are receiving Medicaid when they age out. Youth will receive health care through two programs based on age: STAR Health or the STAR plan.
- Medicaid for Transitioning Foster Care Youth provides medical coverage to eligible young adults ages 18–20 who are not eligible for the FFCC program because they were not receiving Medicaid at the time they aged out of foster care.
- Bacterial Meningitis Vaccine for Students Entering Postsecondary Education. Students under age 30 entering a Texas institution of higher education must be vaccinated for bacterial meningitis. For DFPS foster

⁴ Provided by the youth's primary caseworker, the "[Almost 18?](#)" letter explains services, benefits, and documents and offers contact information that the youth needs before leaving care at age 18. Available at https://www.dfps.state.tx.us/Child_Protection/Youth_and_Young_Adults/Transitional_Living/personal_documents.asp.

⁵ At least 90 days before a youth turns 18 and is ready to leave care, the [Youth Transition Portfolio](#)—all personal materials, documents, and information—must be provided to the youth to help in his or her transition to adulthood. Available at https://www.dfps.state.tx.us/Child_Protection/Youth_and_Young_Adults/Transitional_Living/personal_documents.asp.

youth, payments for doctor's visits and vaccination costs are covered by the FFCC Medicaid (STAR Health or STAR plan) program.

Resources available for foster youth attending a postsecondary institution:

- [Education and Training Voucher](#) (ETV) Program. ETV is a federally funded (Chafee)⁶ and state-administered program. Based on the cost of attendance, youth in foster care or other eligible youth and young adults ages 16 to 23 may be eligible to receive up to \$5,000 in financial assistance for postsecondary education.
- [College Tuition and Fee Waiver](#). The college tuition and fee waiver provide exemptions from payment of tuition and fees at a Texas state-supported college or university to eligible individuals formerly in foster care and adopted youth.
- [DFPS College Scholarships](#). DFPS offers the following scholarship opportunities specifically for youth in or formerly in foster care:
 - Freshmen Success Fund for Foster Youth—This is a grant for first-time first-year students in postsecondary education formerly in DFPS foster care. Each year DFPS provides four one-time grants of \$1,000 available for young adults enrolling in their first year of postsecondary education.
 - C. Ed Davis–PAL Scholarship—This scholarship is for basic nontuition needs of former foster youth who are majoring in government, political science, history, or other pre-law field. Scholarships are for \$1,000 per academic year and are available to sophomore, junior, and senior students.
- [Temporary Housing Assistance between Academic Terms](#)—Texas' Institutes of Higher Education are required to assist full-time students formerly in DFPS foster care (who have been legally emancipated) locate temporary housing between academic terms (Christmas and summer holiday breaks). **Students must request the housing assistance.**
- College Foster Care Student Liaisons. As of January 2016, each state-supported college and university has appointed a foster care student liaison to help foster care students coordinate college readiness and

⁶ The John H. Chafee Foster Care Independence Program helps current and former foster care youths achieve self-sufficiency. The program provides grants to states. US Health and Human Services, Administration for Children and Families website. Available at <https://www.acf.hhs.gov/cb/resource/chafee-foster-care-program>

student success. Liaisons can help students navigate the college system and connect them to resources needed to achieve higher education goals.

Resources available to foster youth who have concerns about their foster care experience:

- Foster Care Ombudsman (1-844-286-0769)—The ombudsman investigates complaints and possible violations of the rights of children and youth in foster care under age 18; ensures that youth understand their rights while in foster care; reviews youths' concerns about case specific questions and complaints; and, with the youths' permission, works with other individuals to improve their care.

Resources available to foster youth to help understand the foster care system:

- Texas Youth Hotline (1-800-989-6884) is a resource for youth, parents, siblings, and other family members who need emotional support.
- Texas Youth Connection is a website designed with input from youth and young adults as a resource for youth in the foster care system, alumni of foster care, and stakeholders seeking general tips and information. This website offers information and resources about safety and well-being, education, finances and banking, records, health care, contacts, jobs, housing, transition center information, PAL contact information, and more. Available at <http://www.dfps.state.tx.us/txyouth/default.asp>.