

Q: Can an Adult Residential Treatment Facility be considered a Supervised Independent Living Placement (SILP) for a NonMinor Dependent (NMD)?

A: Yes, an Adult Residential Treatment Facility may be considered a SILP under certain conditions.

Federal policy permits a state to consider a youth age 18 or older who is residing in a substance abuse, mental health or other residential treatment facility to be in a supervised independent living setting for title IV-E purposes, as long as that youth is living in the facility voluntarily and the arrangement is paired with supervision of the child welfare agency. See Child Welfare Policy Manual, Section 8.3A.8d , Question 2. Therefore, a treatment facility may be approved as a SILP if the NMD is living independently and voluntarily within the facility, and continues to be subject to the court’s jurisdiction and agency supervision.

As previously stated in ACL 11-77:

“Many NMDs can benefit from the experience of a SILP prior to independent living. Although NMDs have varying levels of independence readiness, SILPs cover a wide range of living situations; therefore, NMDs do not have to be ready for complete independence to try out a SILP. The SILP settings can also have varying levels of independence. For example, for those NMDs who may require extra assistance, a SILP can consist of renting a room from a permanent connection that can assist the young adult in preparing for more independence. This can help to prepare NMDs for more independent SILPs, such as an apartment with a roommate. It is important to understand that SILP assessments are based upon the type of SILP being considered.”

Therefore and as with all other SILPs, the readiness assessment should factor in the needs of the youth and the supports offered in the SILP environment. Please refer to ACL 11-77 for additional information regarding readiness assessments and the SILP approval process.