

Title IV-E Administrative Claims for Foster Care Candidates

Summary of Claiming Traditional and Prevention Candidates Under Family First

Basic Concepts

Under the Family First Prevention Services Act (FFPSA), states can claim Title IV-E administrative costs for children receiving in-home services who meet specific criteria to be either traditional foster care candidates or prevention candidates. Criteria consists of:

Traditional Candidates

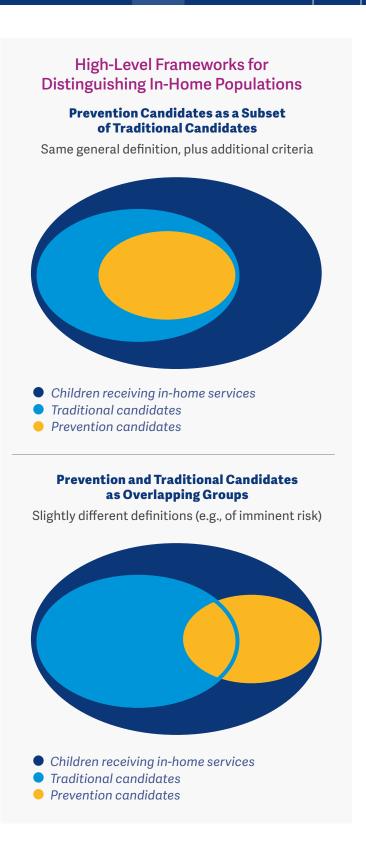
- A defined case plan clearly indicating that, absent effective preventive services, foster care is the planned arrangement for the child, or
- An eligibility determination form which has been completed to establish the child's eligibility under Title IV-E, or
- Evidence of court proceedings in relation to the removal of the child from the home, in the form of a petition to the court, a court order, or a transcript of the court proceedings.

Prevention Candidates

- A Title IV-E prevention plan identifying the child as being at imminent risk of entering foster care, but able to remain safely in the home or in a kinship placement, and
- The implementation of a prevention service approved through the Title IV-E Prevention Services Clearinghouse
- or a child in foster care who is pregnant or parenting.

Depending on how states specifically define the two populations, prevention candidates can either be a *subset* of the traditional candidate population or a *separate* population (with some potential for overlap).

To claim administrative costs for candidates, states must be able to identify which children and which costs are within each of these groups.



Note: if a child is both a traditional candidate and a prevention candidate, it is advantageous to claim costs under the Title IV-E prevention program.

Determining Administrative Costs

- The Administration for Children and Families (ACF) has not prescribed one single method for identifying costs associated with candidates.
- The same principles apply whether a state plans to contract with private providers or to have state workers perform case management for prevention services.
- · Some states are using data elements in their Comprehensive Child Welfare Information System (CCWIS)—such as a checkbox indicator, drop-down box, or other field—to distinguish between traditional candidates, prevention candidates, and non-candidates. When a worker completes the random moment time study (RMTS), they include the child ID number related to their activity. Data can then be pulled from CCWIS/non-CCWIS to identify costs related to traditional candidates, prevention services candidates, and non-candidates for administrative claiming purposes.
- Other states are proposing to use program codes in the RMTS to distinguish between activities provided for a traditional foster care candidate, a prevention services candidate, or a non-candidate.

Points to Remember

- · Advance planning is critical.
 - » Once prevention candidates are defined, states should immediately start the process to develop, document, and plan their practice changes and claiming methodology.
 - » States should develop workplans to identify when training on practice/policy changes can occur.

- · Aim for a process that is as simple and accurate as possible.
 - » States should aim to implement a process that removes the burden of accurately identifying candidates from social workers who may not understand the nuances between traditional candidates, prevention candidates, and noncandidates.
 - » When completing a RMTS, a social worker should only be concerned with identifying the broader case type (in-home, out of home, adoption, etc.) and activity.
 - » Review worker job functions to determine if any staff are fully dedicated to the prevention program. These staff can be claimed directly to the Title IV-E prevention program and can be removed from the RMTS.
- · Leverage existing IT resources
 - » Work with IT teams on the front end to identify data elements that can be used to distinguish the three populations. This will allow the use of the CCWIS/ non-CCWIS system to track, report, and analyze information on the back end and deliver a data-driven claim.
 - » Document decisions made with the IT team to keep tasks and requests on track.
 - » Remember to distinguish start and end dates for prevention services in the CCWIS/non-CCWIS system.
 - » Depending on the approach selected, states may need to alter their RMTS to add additional discrete activities or a field for child ID.

To learn more about how states can claim Title IV-E administrative costs for foster care candidates, contact us today.



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