

# 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.

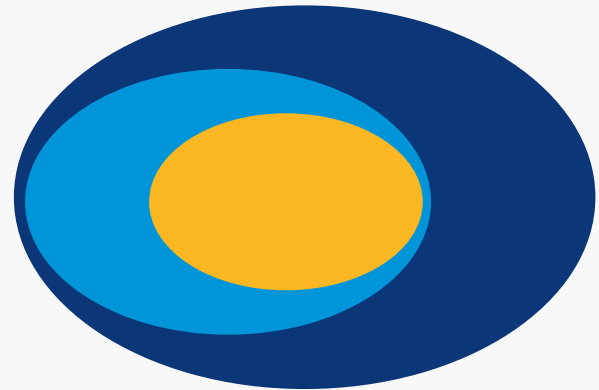
Depending on how states specifically define the two populations, prevention candidates can either be a *subset* of the traditional candidate population or a *separate population* (with some potential for overlap).

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

### High-Level Frameworks for Distinguishing In-Home Populations

#### Prevention Candidates as a Subset of Traditional Candidates

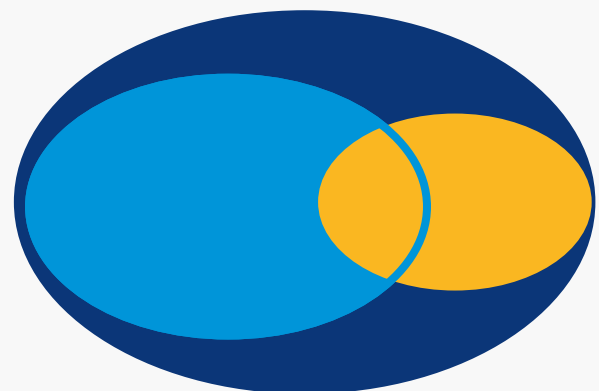
Same general definition, plus additional criteria



- Children receiving in-home services
- Traditional candidates
- Prevention candidates

#### Prevention and Traditional Candidates as Overlapping Groups

Slightly different definitions (e.g., of imminent risk)



- Children receiving in-home services
- Traditional candidates
- Prevention candidates

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 non-candidates.
  - » 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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