

Title IV-E 101: The basics of what is eligible for federal funding participation (reimbursement) and what applies to training activities

**Title IV-E National Roundtable
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**Arizona Department of Child Safety
Andrea Hightower, Grants Manager – Budget & Finance**

Andrea.Hightower@azdcs.gov



Agenda:

1. What are the “go-to” resources for guidance on Title IV-E for training activities?
2. Why is the partnership between sister-state agencies and public child welfare necessary for access to federal reimbursement?
3. How to calculate federal participation by topic & type of training activity
4. How does the passage of Federal Family First Prevention & Services Act (FFPSA) change things for the future?



Federal “Go-To” Resources for Guidance:

1. Foster Care Assistance Program Section 474(3)(A) of the Social Security Act https://www.ssa.gov/OP_Home/ssact/title04/0474.htm
2. US DHHS Departmental Appeals Board (DAB) decision 1530, issued in August 1995
<https://www.hhs.gov/sites/default/files/static/dab/decisions/board-decisions/1995/dab1530.html>
3. 45 CFR § 1356.60 State training programs that **ARE** foster care/adoption focused <https://www.govregs.com/regulations/45/1356.60>
4. 45 CFR § 235.60 - Federal financial participation (FFP) for State and local training programs that **ARE NOT** foster care/adoption
https://www.govregs.com/regulations/expand/title45_chapterII_part235_section235.63#title45_chapterII_part235_section235.60
5. Child Welfare Policy Manual, Section 8 Title IV-E - 8.1H Training – Questions & Answers #1 through #22
https://www.acf.hhs.gov/cwpm/public_html/programs/cb/laws_policies/laws/cwpm/policy_dsp.jsp?citID=116



What are the origins of Title IV-E?

A federal funding mechanism tied to the Social Security Act in 1980. It is intended to support children from economically poor families who are under the care and custody of the public child welfare system.

Based on “cost-reimbursement” principle. States must be prepared to assume 100% of the costs anticipating federal reimbursement (FFP) of a portion of those expenditures.

What costs to the feds participate in?

Room and boarding of dependent children who are considered “economically poor”

Administration of the foster care program (case management, child placement, licensing, etc.)

Training of agency staff, foster-adoptive-guardianship parents, courts and others who are serving Title IV-E eligible children



Partnership for training the child welfare workforce:

BSW/MSW Stipend Programs:

- Commonly known as Title IV-E Stipend programs, the federal government recognizes these as possible only to the extent that the public child welfare agency benefits (workforce retention and/or workforce recruitment).
- There is great variation across the nation in the level of partnership and contributions by public child welfare in Title IV-E Stipend programs.
 - Students can be existing public child welfare workers, those that are willing to work in child welfare, or a combination of both.
 - Degree programs can be in-person, online, full-time, part-time, or a combination of these.
- All programs require that benefiting students must agree to work within the public welfare agency for a time period equivalent to the educational benefit received.



How much of a Social Work Education Program is eligible for FFP?

- The same guidelines apply for training activities conducted inside a public child welfare agency as those that are conducted through a University Title IV-E Stipend program.
- The public child welfare agency is not allowed to receive federal reimbursement on a large portion of the training necessary for certain aspects of child welfare work including:
 - Social Services that are not related directly to a public child welfare system (and specifically the placement of children in out-of-home care);
 - How to perform & document the child abuse & neglect investigation process;
 - How to directly provide services (including how to address or treat problematic behaviors or other issues related to the child or family); and
 - Worker retention and worker safety.



38 topics eligible for FFP

Title IV-E Allowable Training Activities

Foster Care Assistance Program

Under Section 474(3)(A) of the Social Security Act and 45 CFR 1356.60

Allowable activities for which a 75% match rate may be claimed under 45 CFR Part 1356.60	
1	Eligibility determinations and re-determinations
2	Fair hearings and appeals
3	Rate setting
4	Referral to services
5	Preparation for and participation in judicial determinations
6	Placement of the child
7	Development of the case plan
8	Case reviews
9	Case management and supervision
10	Recruitment and licensing of foster homes and institutions



38 topics eligible for FFP

Closely related activities for which a 75% match rate may be claimed under 45 CFR 1356.60	
11	Social work practice, such as a family centered practice and social work methods, including interviewing and assessment
12	Cultural competency related to children and families
13	Title IV-E policies and procedures
14	Child abuse and neglect issues, such as the impact of child abuse and neglect on a child, and general overviews of the issues involved in child abuse and neglect investigations, if the training is not related to how to conduct an investigation of child abuse and neglect
15	Permanency planning, including using kinship care as a resource for children involved with the child welfare system
16	General substance abuse, domestic violence, and mental health issues related to children and families in the child welfare system, if the training is not related to providing treatment or services
17	Effects of separation, grief and loss, child development, and visitation
18	Communication skills required to work with children and families
19	Activities designed to preserve, strengthen, and reunify a family, if the training is not related to providing treatment or services
20	Assessments to determine whether a situation requires a child's removal from the home, if the training is not related directly to conducting a child abuse and neglect investigation. Training on how to conduct specialized assessments, such as psychiatric, medical, or educational assessments, are not permitted
21	Ethics training associated with a Title IV-E state plan requirement, such as the confidentiality requirements in §471(a)(8) of the Social Security Act



Title IV-E 101: The basics pertaining to training activities

38 topics eligible for FFP

Closely related activities for which a 75% match rate may be claimed under 45 CFR 1356.60	
22	Contract negotiation, monitoring, or voucher processing related to the Title IV-E program
23	The Adoption and Foster Care Analysis and Reporting System (AFCARS), the Statewide Automated Child Welfare Information System (SACWIS), or other child welfare automated system functionality that is closely related to allowable administrative activities in accordance with 45 CFR §1356.60(d) that the State of Arizona has chosen to claim as Title IV-E training, rather than as SACWIS developmental or operational costs (see AT-ACF-OISM-001)
24	Independent living and the issues confronting adolescents preparing for independent living consistent with §477(b)(3)(D) of the Social Security Act and the Child Welfare Policy Manual (CWPM), Section 3.1H, Q/A #1
25	Foster care candidate determinations and pre-placement activities directed toward reasonable efforts in 471(a)(15) of the Social Security Act, if the training is not related to providing a service
26	Training on referrals to services, not how to perform the service
27	Grievance procedures
28	Negotiation and review of adoption assistance agreements
29	Post-placement management of subsidy payments
30	Home studies
31	A proportionate share of the development and use of adoption exchanges



38 topics eligible for FFP

Activities for which a 50 % match rate may be claimed under 45 CFR 1356.60 Must be allocated proportionally across all benefiting programs (May include Title IV-E Foster Care and Adoption Assistance, Title IV-B, Subparts 1 and 2)	
32	State agency personnel policies and procedures: acquiring additional knowledge and skill to meet changes such as enactment of new legislation, development of new policies, or shift in program emphasis (see 45 CFR 235.61(b))
33	Job performance enhancement skills (for example, writing, basic computer skills, time management): enabling employees to reinforce their basic knowledge and develop the required skills for the performance of specific functions.
34	First aid, CPR, or facility security training
35	General supervisory skills or other generic skills needed to perform specific jobs training
36	Ethics unrelated to the Title IV-E state plan
37	Team building and stress management training
38	Safe driving



Identifying 9 common instructional components:

1. Instruction of Students provided by:

Child Welfare Agencies	Universities w/IV-E agreements with Child Welfare Agencies	Federal Participation (Reimbursement) Allowable
DCS Learning & Development Unit trainers	Faculty instructing classes required for BSW or MSW degrees	75% calculated by instructor hourly rate of pay x in-class instruction hours (NOTE: this should reflect only the instructional portion of a faculty member time)

2. In-classroom activities supported by:

DCS Learning & Development staff who develop curricula; review curricula; modify curricula; evaluate curricula	University staff who develop curricula; review curricula; modify curricula; evaluate curricula	If activities are conducted by internal staff: <ul style="list-style-type: none"> 75% calculated by staff time/pay devoted to activities that directly tie to classroom activities benefiting students
DCS Learning & Development staff who are available to aid students concerning their program (front desk, administrative, etc.)	University staff who are available to aid students concerning their program (front desk, administrative, etc. but NOT if they are students themselves – e.g. workstudy students)	If activities are procured externally through contracts: <ul style="list-style-type: none"> 75% calculated by costs of contract for activities that directly tie to classroom activities benefiting students



Identifying 9 common instructional components:

3. Training Materials:

Child Welfare Agencies	Universities w/IV-E agreements with Child Welfare Agencies	Federal Participation (Reimbursement) Allowable
<p>Items purchased and provided to students at no additional cost</p> <ul style="list-style-type: none"> • copy paper which is used to print in-class handouts • items purchased for in-class activities and for in-between class activities that are required for successful completion of the course <p>(NOTE: Not hours to develop these materials (see #2 above))</p>	<p>Items purchased and provided to students at no additional cost</p> <ul style="list-style-type: none"> • copy paper which is used to print in-class handouts • items purchased for in-class activities and for in-between class activities that are required for successful completion of the course <p>(NOTE: Not hours to develop these materials (see #2 above))</p>	<p>75% calculated at cost</p>



Identifying 9 common instructional components:

4. Training Venue:

Child Welfare Agencies	Universities w/IV-E agreements with Child Welfare Agencies	Federal Participation (Reimbursement) Allowable
Procured Training Space Note: owned/leased space should be included in Agency Cost Allocation	Procured Training Space Note: owned/leased space should be included in indirect rate	75% ONLY if the space is used exclusively for the use of Title IV-E Training Program students and no other training activities. otherwise <ul style="list-style-type: none"> • 50% Administrative Rate

5. Instructor out-of-class student availability:

Child Welfare Agencies	Universities w/IV-E agreements with Child Welfare Agencies	Federal Participation (Reimbursement) Allowable
N/A	<ul style="list-style-type: none"> • faculty student drop-in office hours are often part of an educational model. This is allowable if the institution has a way to document and measure the time spent w/Title IV-E funded students separate from other students. 	<ul style="list-style-type: none"> • 50% by instructor hourly rate of pay x student office drop-in hours utilized by Title IV-E supported students (NOTE: this should reflect only the portion of a faculty member time devoted to student drop-in hours for the Title IV-E funded program)



Identifying 9 common instructional components:

6. Mangers of Training Program:

Child Welfare Agencies	Universities w/IV-E agreements with Child Welfare Agencies	Federal Participation (Reimbursement) Allowable
<ul style="list-style-type: none"> DCS Staff responsible for the entire Learning & Development Unit from an operational level. Very few requirements to participate in curricula development or to conduct in-class instruction (may happen on occasion but is not the normal expectation). 	<ul style="list-style-type: none"> Possibly the Primary Investigator? 	<ul style="list-style-type: none"> 75% to the extent that the institution has a way to document and measure the time spent on Title IV-E funded programs separate from other training programs that the staff person may be responsible for. <p>otherwise</p> <ul style="list-style-type: none"> 50% Administrative Rate



Identifying 9 common instructional components:

7. Supervisors of Training Program:

Child Welfare Agencies	Universities w/IV-E agreements with Child Welfare Agencies	Federal Participation (Reimbursement) Allowable
<ul style="list-style-type: none"> DCS Staff responsible for oversight of a particular segment of the training program from an operational level. May be required to participate in curricula development or to conduct in-class instruction however the bulk of duties 	<ul style="list-style-type: none"> Possibly the Primary Investigator? 	<ul style="list-style-type: none"> 75% to the extent that the institution has a way to document and measure the time spent on Title IV-E funded programs separate from other training programs that the staff person may be responsible for. <p>otherwise</p> <ul style="list-style-type: none"> 50% Administrative Rate



Identifying 9 common instructional components:

8. Chain of Command for Training Program

Child Welfare Agencies	Universities w/IV-E agreements with Child Welfare Agencies	Federal Participation (Reimbursement) Allowable
<ul style="list-style-type: none"> An example within DCS would be the supervision and direction provided to L&D Management by their direct supervisor (e.g., Chief of Human Resources) 	<ul style="list-style-type: none"> An example within a university system would be the supervision and direction provided to those immediately responsible for oversight of the Title IV-E applicable program (e.g., School of SW Director) 	<ul style="list-style-type: none"> If NOT already included in an indirect rate, then 50% to the extent that the institution has a way to document and measure the time spent on Title IV-E funded programs separate from other training programs that the staff person may be responsible for.

9. Agency Overhead Costs:

<ul style="list-style-type: none"> Most public child welfare agencies have federally recognized cost allocation plans 	<ul style="list-style-type: none"> Public research universities often have federally approved indirect rates 	<ul style="list-style-type: none"> 50% as an allowable Administrative cost
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Calculating likely federal reimbursement (FFP):

Long Term Part-time Title IV-E Training Programs

Allowable Costs & Calculations

Total Instructional Program Costs	Applicable FFP % for each allowable instructional component (50% or 75%)	% of Title IV-E eligible children placed in licensed foster home placements	Federal Financial Reimbursement (FFP)
dollars	percentage	Percentage (national average 50%)	dollars
\$100.00	\$50.00 at 75% FFP = \$37.50 \$50.00 at 50% FFP = \$25.00	\$62.50 x .50	\$31.25



Looking Forward: full implementation of Family First Prevention & Services Act (FFPSA)

FFPSA provides federal funding participation for the first time in 30 years for direct services to children and families. Reimbursement will be possible for evidence-based prevention efforts including: 1) mental health treatment; 2) substance abuse treatment; 3) in-home skill-based services for parents; and kinship navigator services.

FFPSA also significantly restricts former participation in high cost out-of-home non-family placements (which in theory should provide states the savings to reinvest in prevention activities). Because of this, most states have opted for a 2 year delay for full FFPSA implementation, until September 30, 2021.

Come learn more at the workshop on FFPSA Implementation!

