



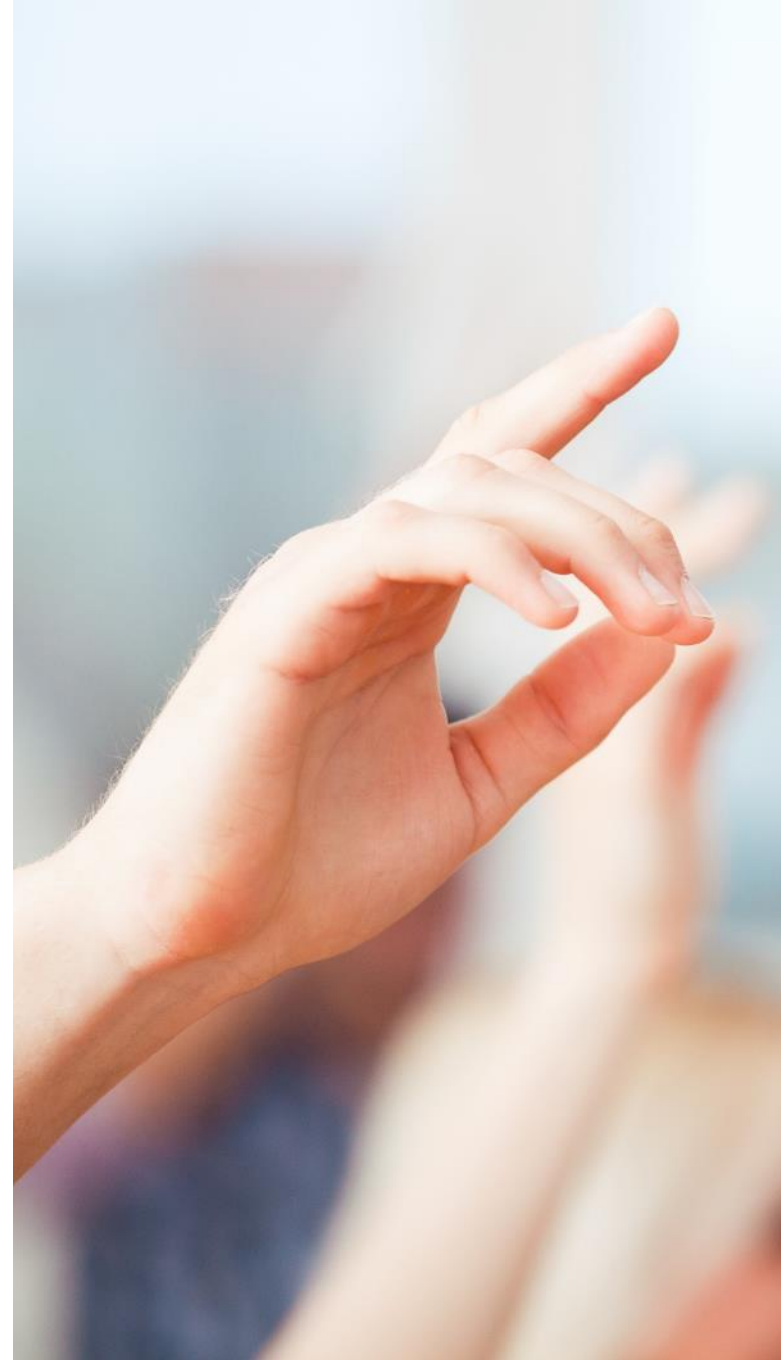
# Child Welfare Track

## Title IV-E Federal Funding Overview

October 19, 2017

# Agenda

- Introduction
- Understanding Title IV-E
- Title IV-E Training
- Understanding Key Terms
- Title IV-E Stipend Programs
- Managing Risks



# Introductions



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# Understanding Title IV-E

# Title IV-E

- The complexity of Title IV-E is realized when it comes to claiming training reimbursement more than in other federal programs
  - Does the training align closely to an administrative cost?
  - What costs are allowed or not allowed? Who can be claimed?
  - How do we match costs?
  - Which eligibility rate (foster care, guardianship assistance or adoption assistance) should be used?
  - What is the eligibility rate ?
- Adding to the complexity is how Title IV-E is reimbursed:
  - Maintenance costs at the Federal Medicaid Assistance Percentage
  - Administration costs at 50% Federal Financial Participation
  - Training costs at 75% Federal Financial Participation
- Costs may be claimed by the State or Tribal child welfare agency

# Maintenance Costs

- child is eligible for Title IV-E when a number of eligibility requirements are met.
- The costs associated with the room, board, care and supervision of children in licensed out-of-home placements are claimable to Title IV-E.
- Costs directly to foster parents, child caring institutions, shelters and group homes
- Eligibility for maintenance is critical piece of any administration or training claiming.

# Administration costs

- Covers a broad array of costs necessary for the proper and efficient administration of the Title IV-E State Plan
- 45 CFR 1356.60 ( c) describes the allowable administrative activities as:
  - Referral to services;
  - Preparation for and participation in judicial determinations;
  - Placement of the child;
  - Development of the case plan;
  - Case reviews;
  - Case management and supervision;
  - Recruitment and licensing of foster homes and institutions;
  - Rate settings;
  - Costs related to data collection and reporting; and
  - A proportionate share of related agency overhead
- The salaries, fringe, benefits, and operating expenses of all personnel performing the above named activity or an activity closely related to the activity is reimbursable.

# Training

- Covers training that is closely aligned to the allowable Title IV-E administrative activities and that are necessary for the proper and efficient administration of the Title IV-E State Plan
- Who can be trained?
  - State employees through pre-service and in-service
  - Foster parents, adoptive parents and guardians (under Guardian Assistance Program), child caring institution staff
  - Judges and other members of the staff of abuse and neglect courts involved in making judicial determinations and other decisions regarding families in the child welfare system
  - Contracted personnel who are performing tasks to support the child welfare agency
  - Attorneys representing the state agency, the children or their parents (CWPM, 8.1H, Question 20)
- Training courses, audience, and distribution of costs must be recorded in Child and Family Services Five Year Plan and updated in Annual Services Plan Update (Title IV-B State Plan)
- Training costs and the allocation methodology must be incorporated in the State/Tribe Cost Allocation Plan



# Title IV-E Training

# What is allowable?

- Confusion often emerges when state agencies/universities begin to unravel what costs are attributable to training (at 75%), administration (at 50%) or unallowable (at 0%).
- What topics are not allowed for Title IV-E reimbursement?
  - How to address or treat child or family problems or behaviors because it supports the delivery of social services rather than the administration of the title IV-E State plan.
  - Conducting child abuse and neglect investigations because such specialized skills are required for staff activities that occur prior to a child entering foster care or adoption, and even prior to a child becoming a candidate for foster care.
  - Child welfare/social service topics that are not related directly to the Title IV-E programs or the administration of the Title IV-E State plan.
- What training is allowed at 50%?
  - State agency personnel policies and procedures
  - Job performance enhancement skills (e.g., writing, basic computer skills, time management)
  - First aid, CPR, or facility security training
  - General supervisory skills or other generic skills needed to perform specific jobs
  - Ethics unrelated to the Title IV-E State plan
  - Team building and stress management training
  - Safe driving
  - Worker retention and worker safety

# What is allowable?

- What topics are allowed at 75% FFP?
  - Federal guidance indicates that to be claimed at 75% the training must be for the administrative costs identified or the costs are necessary for the proper and efficient administration of the Title IV-E State Plan.
  - The Child Welfare Policy Manual (CWPM) has an extensive list of allowable training topics. (CWPM, 8.1H, Title IV-E, Administrative Functions/Costs, Training) Topics such as:
    - Communication skills for working with children and families.
    - Social work practice, such as family centered practice and social work methods including interviewing and assessment.
    - Cultural competency related to children and families.
    - Title IV-E policies and procedures.
    - 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.
    - Permanency planning including using kinship care as a resource for children involved with the child welfare system.
    - 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.
    - Effects of separation, grief and loss, child development, and visitation.

# Training Costs

Training Costs Allowable at 75% (45 CFR 235.64)	
For Agency Training Sessions	Costs
Employees in initial in-service training for at least a week	Salaries, fringe benefits, travel and per diem
Trainees in short-term and/or continuing training sessions away from the work site, in institutes, seminars, workshops related to job	Salaries, fringe benefits, travel, per diem, tuition, books and registration fees
Experts from outside the agency engaged to develop or conduct special program on related to child welfare	Salaries, fringe benefits, travel and per diem
Development Costs	
Costs of space, postage, teaching supplies, purchase or development of teaching material and equipment, and the cost of maintaining and operating a training library as an essential resource to the training program.	

# Training Costs (Cont'd)

## Training Costs Allowable at 75% (45 CFR 235.64)

For Training Away from the Agency	Costs
For employees with no assigned duties participating in full-time, long-term training	Salaries, fringe benefits, dependency allowance, travel, tuition, books and educational supplies
For employees in full-time, short-term training	Salaries, fringe benefits, travel, tuition, books, and educational supplies
For employees in short-term training programs of less than 4 weeks on part-time training program	Travel, per diem, tuition, books and educational supplies
For persons preparing for employment with the state or local agency	Stipends, travel, tuition, books, and educational supplies

### Educational Programs

FFP for payments to educational institutions as described in 325.63(c) to include salaries, fringe benefits, travel of instructors, clerical assistance, teaching materials and equipment

# Key Terms

# Understanding Key Terms

**FFP – Federal  
Financial  
Participation**

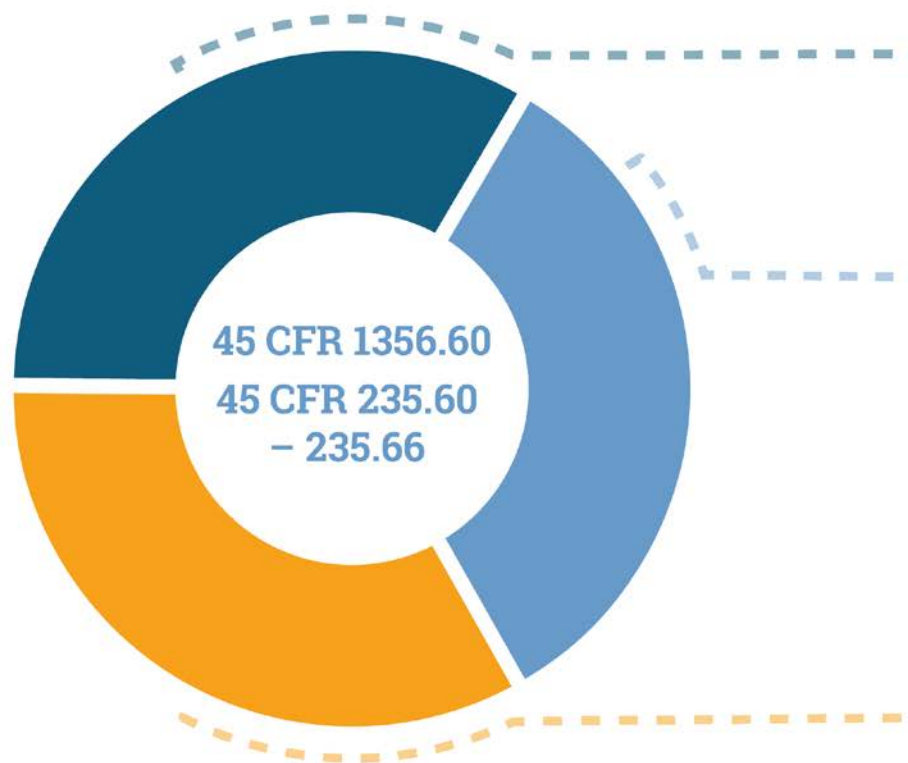
**Allocation  
Methodology**

**CPE – Certified  
Public Expenditure**

**Eligibility Rate**

# Understanding Key Terms

## Federal Financial Participation (FFP)



**FFP or Federal financial participation means the Federal government's share of expenditures made by a State or local agency under a training program**

### **Administrative Costs: 50%**

- Administrative costs to carryout the goals of the training program
- Administrative staff salary/fringe, travel, operating costs, etc.

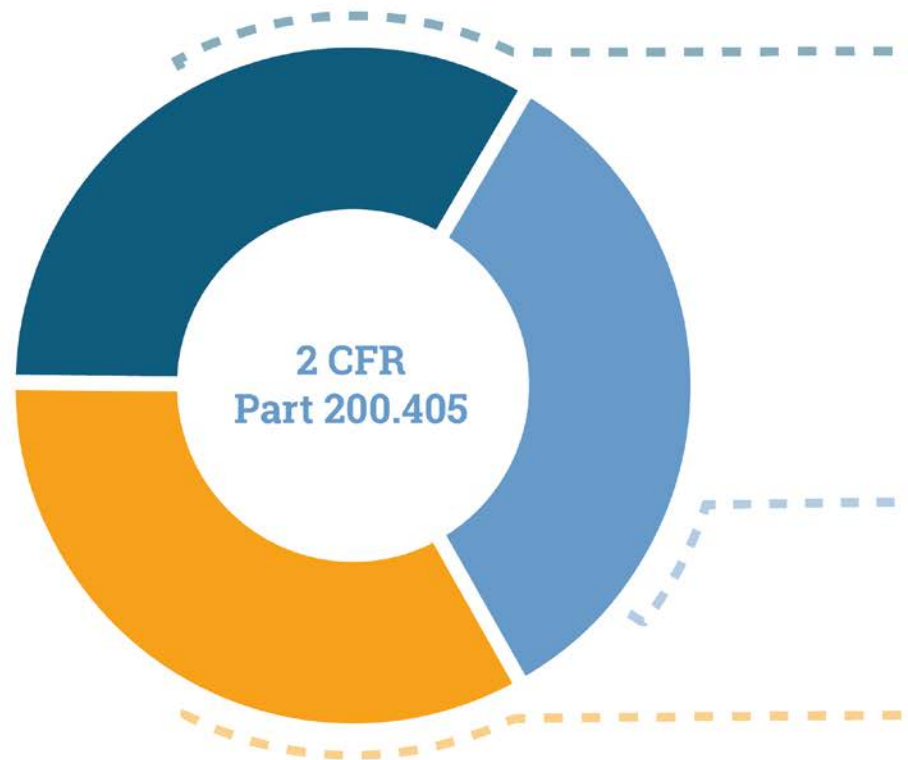
### **Training Costs: 75%**

- Training costs to carryout the goals of the training program
- Teaching faculty salary/fringe, travel, operating costs, etc.
- Student support costs (stipends, tuition, book allowance)



# Understanding Key Terms

## Allocation Methodology



Federal requirements for public assistance cost allocation plans (PACAP) stipulate that costs must be allocated to all federal and state programs in accordance to the relative benefit received. All federal and state programs which benefit from a particular cost must receive an appropriate allocation of that cost, even if that cost cannot be charged to a particular grant.

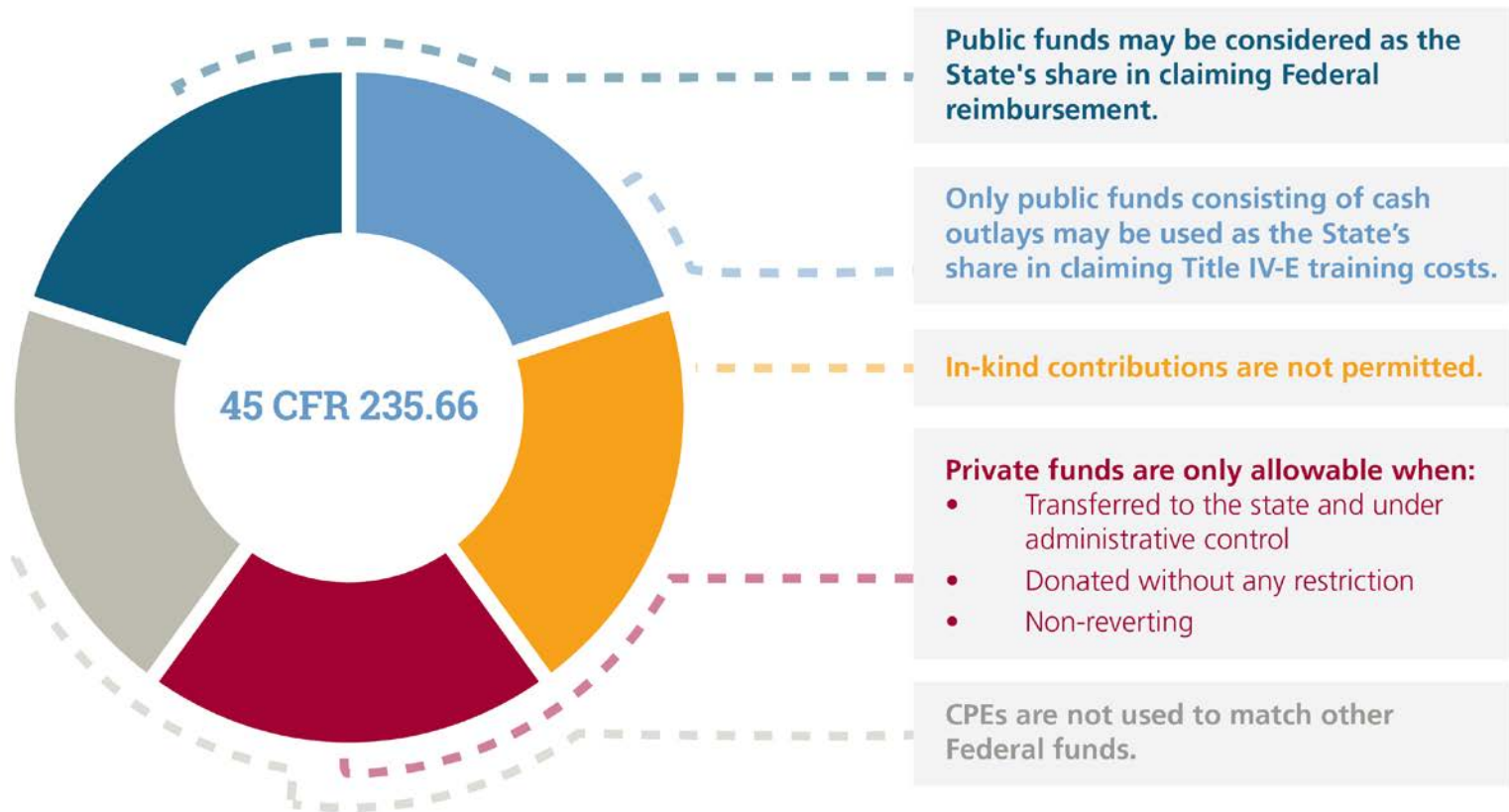
Type of allocation methodology to apply to appropriate benefitting program (Title IV-E) costs

- Random Moment Sampling Results
- Curriculum Statistic

Course topics must relate back to child welfare and/or children and families.

# Understanding Key Terms

## Certified Public Expenditure (CPE)



# Understanding Key Terms

## Eligibility Rate

- Ratio of children who are Title IV-E eligible to the total population of children in out of home care
- Calculated quarterly

Numerator (eligible children) include:	Denominator (ineligible children) include:
<ul style="list-style-type: none"><li>• Children determined Title IV-E eligible</li><li>• Children who are living with a relative/kin while the placement is being licensed</li><li>• Children who are receiving Supplemental Security Income</li></ul>	<ul style="list-style-type: none"><li>• Children who are ineligible</li><li>• Children who are not determined, but pending determination</li></ul>

# Title IV-E Stipend Programs

# Title IV-E Training & Stipend Programs

Title IV-E Stipend Programs offer financial support for students preparing for employment with a Title IV-E agency

Components of the stipends include:  
Tuition  
Reimbursement,  
Book Allowance,  
Travel Expenses, and  
a Living Stipend

## Federal Financial Participation

- Training Expenses: 75%
- Administrative Expenses: 50%

## Title IV-E Stipend Program Models:


- University Consortia
- University Partnerships
- State Administered Training Program

# Audit Risks – DAB Decisions

# Audit Risks – DAB Decisions


## Illinois Department of Children and Family Services, DAB No. 1422 (1993)

 **Issue:** Untimely Claiming

 **Finding:** A claim for FFP for expenditures under Title IV-E are required to be filed within the two-year period which begins on the first day of the quarter following the quarter in which the expenditures were made.

- ACF disallowed part of the direct training costs claimed by Illinois on the ground that these costs should have been allocated to benefitting programs other than Title IV-E. ACF also disallowed all of the indirect costs which Illinois claimed on the ground that the indirect cost rates which Illinois applied to calculate these costs were developed using costs that were not allowable as training costs.



## Florida Department of Children and Families, DAB No. 2080 (2007)

 **Issue:** FFP for Title IV-E training costs is not available for training persons for employment at private agencies.



 **Finding:** FFP at the 75% rate for Title IV-E training costs is not available for training persons who will be employed in private agencies.

# Audit Risks (con't)



## Nebraska Health and Human Services System, DAB No. 2110 (2007)

-  **Issue:** Whether Nebraska can allocate to Title IV-E all of the costs of foster care training for child protection and safety workers who are employed by or preparing for employment with Nebraska, even though those workers also handle cases of foster care children who are not eligible for Title IV-E maintenance payments.
-  **Finding:** The HHS Division of cost Allocation (DCA) has discretion to disapprove a state's proposal to charge costs to a program even if the program agency would allow it, but DCA must give an adequate reason for why it does not defer to agency policy.

## New Mexico Children, Youth and Families Department, DAB No. 2159 (2008)

-  **Issue:** Whether all indirect costs can be claimed at 75% FFP.
-  **Finding:** Indirect administrative costs must be claimed at 50% FFP.

## West Virginia Department of Health and Human Resources, DAB No. 2529 (2013)

-  **Issue:** CAP Methodology
-  **Finding:** CAPs must include an acceptable methodology for allocating claimed training costs.





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