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October 29, 2014

COUNTY FISCAL LETTER (CFL) NO. 14/15-29

TO: COUNTY FISCAL OFFICERS
COUNTY WELFARE DIRECTORS
CHIEF PROBATION OFFICERS
COUNTY AUDITOR CONTROLLERS

SUBJECT: COUNTY PROBATION DEPARTMENT (CPD) TITLE IV-E CLAIMING
INSTRUCTIONS

REFERENCE: [CFL NO. 13/14-56](#), DATED JUNE 11, 2014 [ALL COUNTY LETTER \(ACL\) NO. 14-36](#), DATED MAY 20, 2014 ; [CFL NO. 13/14-44](#), DATED MAY 28, 2014; [CFL NO. 12/13-24](#), DATED DECEMBER 31, 2012; [ACL NO. 07-48](#), DATED NOVEMBER 20, 2007; [ACL 04-32](#), DATED SEPTEMBER 7, 2004; [CFL NO. 90/91-53](#), DATED JANUARY 8, 1991; [2 CODE OF FEDERAL REGULATIONS \(CFR\) 225; MANUAL OF POLICY AND PROCEDURES \(MPP\) SECTION 45-202.612](#)

The purpose of this CFL is to inform counties of the revised claiming instructions for the Title IV-E Foster Care and the Adoptions Assistance Program under the supervision of the CPD.

The California Department of Social Services (CDSS) is the single state agency with the authority to administer the Title IV-E Foster Care Program. The CDSS has agreed to accept claims from County Welfare Departments (CWD) for Title IV-E eligible activities on behalf of the CPD and has agreed to submit these claims for federal reimbursement. Per [2 CFR 225](#), “costs must be necessary and reasonable for proper and efficient performance and administration of federal awards in order to be claimed for reimbursement.” Failure to properly claim these activities can result in an audit or review finding and risk the loss of federal funding. There is no State participation in the funding of these Title IV-E activities (unless otherwise noted), and the County is responsible for the repayment of all audit exceptions and disallowances taken by Federal agencies on Title IV-E funded PO activities.

The CPDs may provide the placement and care of youth per Manual of Policy and Procedures ([MPP section 45-202.612](#)). Due to this allowability, CDSS implemented the pass-through of Title IV-E funds to CPDs for eligible administrative costs associated

with wards of the state placed in Foster Care or identified as candidates at risk of imminent removal into a Foster Care placement.

The CWDs pay the board and care cost (otherwise known as maintenance or assistance payments) for CPD supervised children placed in Foster Care. The CWD reports associated Title IV-E funded administrative costs (i.e. case management) reported by the CPD on the County Expense Claim and reimbursement is passed through to the CPD.

For the CWDs not participating in the Title IV-E California Well-Being Project (Project), Title IV-E Foster Care is an entitlement program and the board, care and associated administration costs are not capped. Under the Title IV-E Project, participating CWDs and CPDs received a waiver of federal regulations regarding the use of Title IV-E funds. This allows the counties flexibility to spend Title IV-E assistance and administration funds on costs that are normally unallowable for Title IV-E reimbursement. In exchange for the funding flexibility, the Title IV-E Project CWDs and CPDs agree to receive a capped allocation for both the Foster Care administration and assistance costs.

Memorandum of Understanding (MOU)

To obtain the pass-through Title IV-E funds, a MOU must be developed and implemented between the CWD and the CPD. The MOU outlines the roles and responsibilities of each department regarding the pass through of Title IV-E funds (refer to [MPP section 29-405](#)). The MOU also defines the following:

- Method that will be used to develop an Indirect Cost Rate (ICR) proposal (refer to "ICR" section in Attachment IV).
- Time study requirements (refer to "Time Study" section in Attachment III).
- The process of notifying the CWD of claimable expenditures (typically via an invoice process).
- How the funds will be disbursed.
- The billing methodology.
- Ensures compliance with federal Title IV-E program requirements.

Below is a list of Attachments to this CFL which describes the methodology, claiming instructions or claiming process for each topic:

- Attachment I - Unallowable Costs
- Attachment II - Allowable Costs
- Attachment III - Time Study Process
- Attachment IV - Allocation Requirements / Indirect Costs / Direct Charge
- Attachment V - Summary

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- Attachment VI - Program Code Matrix

If you have any questions regarding this CFL, please direct them to fiscal.systems@dss.ca.gov, and reference this CFL in the subject line.

Sincerely,

Original Document Signed By:

LILIA A. YOUNG, Chief
Fiscal Forecasting and Policy Branch

Attachments

Unallowable Costs/Probation Only

Time spent by County Probation Departments (CPDs) on unallowable Title IV-E administrative activities (regardless of the type of case) is claimed to “Probation Only” Program Codes (PCs) which do not receive Title IV-E reimbursement and are not claimed on the County Expense Claim. The CPDs will use “Probation Only” to capture any time related to unallowable costs (refer to Attachment VI for the PC description). It must be evident upon reviewing the time study summaries which portion of the salary (of the case-carrying worker’s time study) has been assigned to the non-Title IV-E activity pool.

The CPDs must be able to distinguish which children are reasonable candidates at risk of imminent removal into a Foster Care placement and which children are not reasonable candidates at risk for imminent removal into a Foster Care placement and be able to report these reasonable candidate caseloads to the County Welfare Department (refer to the Attachment IV, “Allocation Requirements” section). Juvenile probation cases that have not been determined to be a reasonable candidate are not allocable to Title IV-E and are considered to be “probation only” cases; for example, a youth on probation but at home pending candidacy determination. Unallowable costs are those that are law enforcement-based and not limited to: correctional (criminal) court related activities, law enforcement activities, filing petitions or dispositions related to a criminal offense and, booking activities.

In some cases there may be staff providing support to the case-carrying staff, such as a hall monitor/supervisor at the detention facility. These staff are not allowed to time study for, or have any part of their salary charged to, Title IV-E for reimbursement. Also, staff who work in detention centers may not be claimed in the indirect cost rate. The method of how the indirect cost rate is used should be applied department-wide (to include both youth and adult facilities for related staff).

Examples of unallowable costs are as follows (claimed to “probation only code”):

- Any activity **not allocable** to Title IV-E is unallowable. Examples of unallowable costs include, but are not limited to:
 - Law enforcement activities such as correctional (criminal) court related activities.
 - Filing petitions or dispositions related to a criminal offense.
 - Administering drug testing.
 - Any work related to youth in juvenile detention, boot camps, ranches, secure placements, locked door facilities or any other secure facility in which probation has administrative control.
- Cases in out-of-home placement, but not placed in an allowable Title IV-E placement setting, are not allowable and cannot be charged to PC 127.

- Other types of juvenile probation cases that have not been determined to be a reasonable candidate (i.e.: a youth on probation at home pending a candidacy determination) are not allowable under Title IV-E and cannot be charged to PC 128.

Allowable Administrative Activities

Certain administrative activities performed by County Probation Departments (CPD) on behalf of federally eligible children in Foster Care or identified as candidates at risk for imminent removal into a Foster Care placement are eligible for Title IV-E reimbursement pursuant to federal regulations. These administrative costs include case management, allowable court related activities and administrative overhead related to these costs.

The California Department of Social Services (CDSS) provides claiming instructions to the County Welfare Departments (CWD) and CPDs via County Fiscal Letter that are developed in accordance with federal regulations outlined in [45 Code of Federal Regulations \(CFR\) Section 1356.60\(c\)](#). Claiming instructions are also consistent with the Administration for Children and Families (ACF) - [Child Welfare Policy Manual's 8.1D Question Eight](#), "*the state may claim administrative costs in the month that it documents a child is a candidate for Foster Care.*"

Administrative costs incurred for the time spent assessing whether a youth is a Foster Care candidate (i.e., gathering pertinent information in preparation for documenting eligibility), may be claimed if these activities occur in the month in which the child's candidacy for Foster Care is documented. For example, if a caseworker spends time in December 2013 gathering information needed to determine candidacy, but candidacy is documented in January 2014, then only the time spent in January 2014 is eligible for Title IV-E reimbursement as a case management function. The case plan must be clearly signed by all required parties. Case plan documentation must also include the time (hours and date[s] incurred) spent prior to the determination which the youth is a candidate at risk of imminent removal into a Foster Care placement in order to be recorded appropriately on the time study.

Title IV-E allowable administrative costs (i.e. case management and allowable court related activities) are determined by having all Probation Officers (POs) and supervisors, who are assigned to carry a juvenile caseload, time study to the benefiting program. The use of specific time study codes and direct cost Program Identifier Numbers ensure the costs are claimed to the appropriate federal code and avoid any duplicate claiming. To prevent the duplicate claiming to federal programs, each time study code represents a single federal fund source.

Training is an allowable Title IV-E funded administrative cost per [42 CFR 1356.60](#) and is allowed to be claimed at both 75 percent and 50 percent. The enhanced Federal Financial Participation (FFP) rate of 75 percent are for those administrative activities closely related to the Title IV-E program allowed in [42 CFR 1356.60](#). The 50 percent rate of FFP is for topics that address general skills or knowledge required for overall job performance related to Title IV-E. For more information regarding allowable training (otherwise known as staff development) costs, please refer to "Section V," Staff

Development Costs in the current [County Cost Allocation Plan](#). Training costs, at the enhanced rate, can only be claimed for those agency CPD staff who has care, custody and control of Title IV-E eligible children. Trainings must be related directly to operation of the Title IV-E requirements, and are specific to induction training or other training are specified at [42 CFR 1356.60](#).

For general administrative trainings that benefit programs beyond the scope of Title IV-E (i.e. training related to general writing skills), the CPD indirect cost rate can be utilized to allocate costs to the benefitting programs (refer to the “Indirect Costs” section within this document). As an alternative, CPDs may claim these costs as “Generic” on the time study and reallocate hours to all benefitting programs. As a reminder, Title IV-E cannot be used for training for detention staff or training related to placement in a detention facility.

The CPD case-carrying staff may also perform activities that are unallowable for Title IV-E reimbursement or are performed on behalf of ineligible cases. To ensure only allowable activities are claimed to Title IV-E, these CPD staff report time spent on these activities to codes specifically established for unallowable/ineligible activities. The CPD staff time study to account for time spent on the allowable and unallowable Title IV-E activities or for ineligible cases (refer to the “Allocation Requirements”, Attachment IV).

All probation activities are reported using the Program Codes (PC)s listed in Attachment VI. The PC descriptions detail the allowable activities to be claimed under each PC. These PC costs are claimed as direct costs by the CWD on the County Expense Claim based on the invoice submitted to the CWD, by the CPD, on a quarterly basis. The billing methodology and process of submitting claims to the CWD for reimbursement must be outlined in the Memorandum of Understanding between the CPD and CWD.

The CPDs may claim Title IV-E reimbursement for pre-placement activities for a candidate at risk for imminent removal into a Foster Care placement using the pre-placement PC 128 - Probation IV-E Pre-Placement Prevention. There are certain “at risk” children who are documented as candidates at risk for imminent removal for Title IV-E Foster Care placement and for whom CPDs may receive Title IV-E reimbursement for allowable administrative costs (defined in the ACF - [Child Welfare Policy Manual 8.1D Question #2](#)).

The process of gathering information in preparation for eligibility determination for youth in out-of home placement is Title IV-E allowable. However, this is considered a case management activity and should be claimed under the PC for youth in placement (PC 127- Probation Title IV-E Case Management) or youth in the Adoptions Assistance Program (PC 132 – Probation Title IV-E Adoption Assistance Program). The CWD completes the Title IV-E eligibility determination.

The CPD segregates the types of cases and is able to distinguish costs for the following categories of PCs:

- Non-Foster Care juvenile probation cases that have not been determined a candidate (probation only).
- Candidates at risk of imminent removal into a Foster Care placement (pre-placement).
- Foster Care (out-of-home placement).
- Adoption Assistance Program.
- Title IV-E California Well Being Project.

The PCs for each category are identified below:

Probation Only

- Probation Only - Probation Only Code (Refer to “Unallowable Costs” section, Attachment II)
- Generic Code – Probation department-wide general administration activities

Candidates

- PC 128 - Probation Title IV-E Pre-Placement Prevention

Foster Care

- PC 004 - Probation Peer Quality Case Reviews
- PC 127 - Probation Title IV-E Case Management
- PC 130 - Probation Title IV-E Training
- PC 131 - Probation Title IV-E Licensing
- PC 576 - Probation Title IV-E Training - Administration
- PC 579 - Monthly Visits/Group Home Probation
- PC 581 - Non-federal Monthly Visits/Group Home Probation
- PC 703 - Child Welfare Services Outcome Improvement Project (CWSOIP)- Probation
- PC 704 - CWSOIP-Probation Non-federal
- PC 788 - Probation Non-Related Legal Guardian (NRLG) (Under 18)
- PC 789 - Probation NRLG Non-Minor Dependent (NMD)
- PC 790 - Probation Non-Related extended Family Member (NREFM) (Under 18)
- PC 791 - Probation NREFM NMD
- PC 818 - Extended Foster Care (EFC) Non-federal Group Home Monthly Visits (GHMV) Probation

- PC 844 - EFC GHMV Probation
- PC 851 - EFC Probation Case Management
- PC 854 - EFC Probation Training
- PC 855 - EFC Probation Training-Administration

Adoption Assistance

- PC 132 – Probation Title IV-E Adoption Assistance Program (AAP)

Title IV-E California Well-Being Project

(The following codes may only be used by counties participating in the Title IV-E California Well-Being Project)

- PC 921 – Probation - Services/Non-federal
- PC 917 – Probation IV-E Waiver Evaluation

Time Study Process

In order for the County Probation Departments (CPD) to determine eligible costs, the CPDs must first determine if both the type of case and the activity are eligible for Title IV-E reimbursement. The three child welfare case types are candidates at risk of imminent removal into a Foster Care placement (pre-placement), non-Foster Care juvenile probation cases that have not been determined a candidate (probation only) and Foster Care (out-of-home placement). Once a type of case is determined to be eligible, the activity must then also be deemed eligible. It is important to remember both the type of case and activity must be eligible for probation Title IV-E reimbursement.

Before regular daily time studying may begin, the type of case must be determined before determining the proper claiming code. This will ensure the type of case (candidates at risk of imminent removal into a Foster Care placement [pre-placement], non-Foster Care in-home cases [probation only], Foster Care [out-of-home placement]) is being claimed correctly.

The CPDs may elect one of the following three time study/certification methodologies and the methodology must be detailed in the Memorandum Of Understanding, for supervisors, support staff time and caseworker costs:

1. A single random moment time study, using the Program Codes (PCs) and definitions specified in Attachment VI (with the exception of PCs 581 and 818 related to non-federal costs for Group Home Monthly Visits [GHMVs]), and meeting standards specified in Attachment D of the approved [FY 13-14 County Cost Allocation Plan](#).
2. A mid-month time study process using the PCs and definitions in Attachment VI (with the exception of PCs 581 and 818 related to non-federal costs for GHMVs). On the time study form, the staff records and accumulates time spent on a particular program in a representative period of every quarter. The time study form can be completed in the mid-month of each of the four quarters, or on 22 randomly selected days of each quarter. Whichever time study period is chosen, the same period must be used in each quarter. For the CPDs completing a mid-month time study, the CPD has the option of using the calendar month or two consecutive biweekly payroll periods it most closely match the mid-month time study as the time study period. For the CPDs choosing the 22 random-day method, the CPD will use a random numbers chart to select the 22 days. An example of this chart and process are included in Attachment F, in the approved [FY 13-14 County Cost Allocation Plan](#).
3. A continuous daily time study, using the codes and definitions specified in Attachment VI (with the exception of PCs 581 and 818 related to non-federal costs for GHMVs). Staff are to time study daily throughout all three months of the quarter.

NOTE: Time studying probation staff are allowed to claim (direct charge) to all codes in Attachment VI, except the codes which capture the non-federal cost of GHMVs, PCs 581 and 818. The PC 004 is to be excluded from CPDs applying the

non-federal discount rate. The PC 004 – Probation Peer Review costs must have the discount rate applied. However, the discount rate is applied inside of the County Expense Claim as stated in [CFL 13/14-44](#).

For candidates at risk of imminent removal into a Foster Care placement, claiming may begin the month of when the candidacy determination has been made. For CPDs performing the time study method (b) mid-month period above, if candidacy has been determined past the mid-month, claiming may begin the next quarter.

Clerical and administrative support staff salaries are identified through a separate time study or time certification process. The Supervising Probation Officer's (PO) and support staff who are not 100 percent dedicated to activities related to Title IV-E, will complete a time study to allocate costs to the benefitting program (candidates at risk of imminent removal into a Foster Care placement [pre-placement], non-Foster Care in-home cases [probation only], Foster Care [out-of-home placement]).

The Supervising POs and support staff should only time study if carrying a caseload or if there is a significant variation of duties from period to period.

The time certification process uses the supported case carrying PO's time to generate a percentage, which the support staff will certify as their allocable Title IV-E hours. During the mid-month of each quarter, clerical and administrative support staff either time study or time certify their activities on the Support Staff Time Report (DFA 7) (see Attachment E of the approved [FY 13-14 County Cost Allocation Plan](#)). The CPDs may also choose to use a form designed by their county, to the appropriate benefitting level. The CPD must identify how support staff will capture their time by either: time studying (reporting during the time period in accordance with the selected methodology above) or time certifying (end of month reporting for the mid-month). In addition, the CPD must identify to which benefitting level the CPD is reporting by either: generic (department-wide), or directly to specific programs. At the end of each quarter, time study/time certification summaries are compiled for the purpose of allocating generic costs.

Allocation Requirements

To allocate administrative costs to the benefitting programs time studies/certifications are performed by case-carrying Probation Officer's (POs) and their supervisors and support staff. The hours recorded on the time study form are converted to a cost using the pool of salaries and benefits of those that have completed the time studies/certification. The amount of cost that is allocable to the Title IV-E Program Codes (PCs) is then further adjusted to reflect the proportion of activity related to Title IV-E children through application of the Title IV-E non-federal discount rate, as discussed below. Allocable hours do not include hours such as vacation, sick, etc.; these hours would be considered non-allocable to Title IV-E. The salaries and benefits reported are allocated to the programs based on the caseworker time study hours, or observations, reported for each program. Total caseworker and support staff salaries and benefits, as well as the summary of time study hours or observations, should be reported on the County Probation Departments (CPDs) invoice to the County Welfare Departments (CWDs).

For the candidacy for Foster Care administrative costs, the Title IV-E Foster Care non-federal discount rate is used to allocate to the benefitting programs (juvenile probation cases that have not yet been determined a candidate for foster care, out-of-home placement and probation only), per the [Child Welfare Policy Manual 8.1C Question Three](#). As stated in [County Fiscal Letter \(CFL\) No. 12/13-24](#), the Title IV-E non-federal discount rate is the state's federally-approved methodology for allocating costs to the benefitting programs. Each CWD must calculate its own Title IV-E non-federal discount rate on a quarterly basis using the approved methodology outlined in [CFL No. 12/13-24](#). This methodology must be applied uniformly statewide to meet federal cost allocation plan requirements for consistent and equitable treatment of costs as required by the [2 Code of Federal Regulation \(CFR\) 225 Appendix A](#). The CWDs may choose one of two options for calculating the Title IV-E Foster Care non-federal discount rate used on the County Expense Claim (CEC):

- 1) Use a single county rate based on combined CWD and CPD foster care cases.
- 2) Calculate separate rates for CWDs and CPDs based on their respective foster care populations.

Under both options, the CWD is responsible for reporting the discount ratio calculation. The CWD will provide the quarterly Title IV-E non-federal discount rate to the CPD. The CPD may then apply the Title IV-E non-federal discount rate to eligible costs prior to submitting invoices to the CWD. The CPD may also have the CWD apply the Title IV-E non-federal discount rate on the CPD's behalf before costs are claimed on the CEC.

The Title IV-E Foster Care non-federal discount rate is computed as follows:

Numerator: Unduplicated Title IV-E eligible cases (refer to [CFLs No. 12/13-24](#) and [CFL No. 13/14-44](#) for more information).

Divided by

Denominator: Total of all Title IV-E eligible and Non-Title IV-E eligible cases, including Emergency Assistance-Foster Care, State-Only Foster Care, County/Tribe-only Foster Care and any other open child welfare case managed by the social worker.

The CWD and CPD must decide which department will retain the time study records for audit documentation purposes. If the CPD retains the time study records and the CPD has eligible costs that can be claimed to Title IV-E, the costs should be documented and listed under the appropriate PC. The documentation and a copy of the invoice should be kept by the CPD; only the original invoice needs to be sent to CWD. If the CWD agrees to retain the time study records, the same time study process is completed by the CPD. Instead of the CPD retaining the records, the CPD sends the document to the CWD with the invoice. The time study documents, in addition to all other claiming documentation, must be maintained on file for three years by the CPD after the last quarter of the federal fiscal year. The CPD must produce documents in the event of a federal, state, county or Office of Management and Business Circular A-133 audit ([45 CFR 92.42](#)).

Direct Charge

Non-salary direct costs may be claimed if the costs are documented, accurate records maintained and clearly identifiable to a claimable Title IV-E activity. If records are maintained by PO's engaged in prevention or case management activities (e.g. costs associated with travel costs for miles driven in order to carry out case management activities), then those costs should be charged to the related case management program code.

Such costs cannot be claimed as direct costs if they are included in the indirect cost rate and should be claimed to the code for the activity for which they are incurred. The [2 CFR 225](#) cost principles require that like costs are treated in a consistent manner (costs of the same nature or grouping). For example, comparable costs could be considered to be ALL travel costs for the department or individual items of travel costs. Invoices will be the direct charge basis used in determining the methodology for charging non-salary direct costs to the function or program level.

The CPDs shall distribute support operating costs as: (1) allocated based upon a ratio of caseworker allocable time study hours/observations; or (2) utilizing an indirect cost rate. The chosen alternative is dictated by a CPD's ability to accurately identify and compile related costs. Whatever method is chosen should account for a proper proportionate distribution of overhead to programs in the juvenile division. Direct charge methodologies will be based on a reasonable causal relationship to the specific cost category (e.g., square footage for space, mileage rate for travel, etc.). Consistent treatment of such costs will be subject to review. Support operating costs typically have a department-wide benefit to all programs, or cannot be direct charged to a function and/or program. Support operating costs will be distributed based on a ratio of total caseworker allocable hours/observations, or total paid casework hours.

Indirect Cost Rate (ICR)

The CPDs are allowed to claim indirect costs for Title IV-E reimbursement utilizing an ICR. In developing an ICR, the CPDs must follow the same rules set forth for CWDs in the [County Cost Allocation Plan \(CCAP\)](#), following guidance from [2 CFR 225](#). For CWDs, the ICR is used to identify the amount of administrative overhead costs associated with non-welfare activities, which are subsequently reported in the extraneous section; therefore, the costs are removed from the CEC for cost allocation purposes. This ensures that indirect administrative costs associated with non-welfare activities (law enforcement activities, costs of the court, unallowable Title IV-E costs, and costs related to work in or for children in detention facilities, etc.) are not charged to federal grants funding CWD activities. The CWD has the option to use the predetermined ICR developed by California Department of Social Services (CDSS) or to develop an ICR specific to the staff involved. However, because the administrative structure of the CWD is different than the CPD, the CPD follows the instructions provided by CDSS to develop an ICR applicable to the CPD programs. This ICR would be applied to the portion of the CPD staff's salary and benefits associated with Title IV-E activities to develop the final invoice submitted to the CWD.

The ICR must include like costs from the CPD (refer to Attachment V, "Summary" for example ICR calculation). For example, the ICR must include total salary and benefits of the entire Probation Department divided by total support operating costs of the entire probation department **or** total juvenile probation department support operating costs divided by juvenile probation department salary and benefits. As previously stated, the ICR must be documented in the Memorandum Of Understanding and updated as required by [2 CFR 225](#). The CPDs may not simultaneously direct charge and apply the ICR to the same costs. Only one method may be applied and must be claimed consistently with other like costs.

For more information regarding indirect costs and rates, please refer to the following sections located in the approved [FY 2013-14 CCAP](#):

- Introduction
- Section V – Staff Development and Training costs
- Section VI – Direct Costs (Non-welfare Activities)
- Attachment A, Purchases of Services/Direct Costs of Trainees

Summary

Any Probation Officer (PO), supervising officer or any other staff assigned to carry a juvenile caseload must complete a time study to account for all of their activities performed on a daily basis, for both Title IV-E allowable and other non-Title IV-E activities. The County Probation Department (CPD) will determine if support staff will time study or time certify. Staff who are 100 percent dedicated to Title IV-E should time certify. Staff who spend time on multiple programs should time study (refer to more specific information under the subsequent "Time Study Process" section, refer to Attachment IV of this letter).

In capturing time for allocation purposes, the CPD has the option to use either the mid-month, continuous or random-moment time study process. The time study hours that are reported out of the time study process are summarized into the various Title IV-E and non-Title IV-E activity codes. Time study hours are then applied to the salaries and benefits of only the pool of workers completing the time studies to determine the Title IV-E allowable and the unallowable case management costs. The CPDs utilize the same *casework cost* pool methodology as stated in the "Introduction" section of the [County Welfare Department \(CWD\) Cost Allocation Plan \(CCAP\)](#). All overhead costs associated with case-carrying workers that time studied and/or support staff is assigned for claiming purposes through the use of the Indirect Cost Rate (ICR) process, similar to how a CWD accounts for overhead for non-welfare activities.

In summary, the following represent the basic steps necessary for the CPD to complete the invoice submitted to the CWD for Title IV-E reimbursement.

1. The CPD determines which staffs are assigned to carry cases for juveniles.
2. The case-carrying staff complete a time study process to identify allowable Title IV-E and non-Title IV-E activities using the codes provided by the California Department of Social Services.
3. At the end of the time study period, the time (**hours**) reported is summarized. Once summarized, percentages are developed to apply to the pool of total salary and benefits of the case-carrying workers that time studied, along with supervisors and support staff who time studied/certified. Or as an alternative, support staff could record time as generic and be included in the department-wide ICR only.
4. The total hours pool only contains the portion of the salary and benefits hours spent on Title IV-E eligible activities performed. Non-allocable activities (vacation, sick time, etc.) should not be included in the total hours pool. For example, if a worker performs case work activities 70 percent of the time, and performs administrative (non-allocable) activities 30 percent of the time, then only 70 percent of the hours should be included in the total hours pool (for specific examples, refer to [CFL 90/91-53 pages 1-3](#)). (Non-allocable hours should not be reallocated, but the associated salaries and benefits are kept in the pool.)
5. The amount of salary and benefits that results from the allocation process in number three above for Title IV-E codes is further adjusted by application of the discount rate, to arrive at the salary and benefit costs that equate to Title IV-E allowable

activities for Title IV-E eligible cases. Non-salary direct costs should also have the discount rate applied.

6. The direct costs should be claimed to the category in which they were incurred and only be claimed as such if they are NOT included in the department-wide ICR. Comparable (“like”) costs must be treated in a “like” manner. For example, if transportation is claimed as a direct cost for Title IV-E, it must be treated as a direct cost for ALL programs (for both juvenile non-Title IV-E and Title IV-E cases and adult alike), and **excluded** from the ICR calculation.
7. The CPD or County Auditor-Controller develops and updates an annual ICR pursuant to [2 CFR 225](#). In the calculation, the **numerator** of the rate contains all overhead costs, and administrative and support costs, that relate to the juvenile division, and the **denominator** is the total salary and benefits for all case-carrying juvenile workers that serve both Title IV-E and non-Title IV-E cases. **As a reminder, if the ICR is not specific to the juvenile division, “like” costs cannot be claimed both as a direct charge for the juvenile program and included in the ICR for the adult program.**
8. The ICR in number seven above is applied to the salaries and/or benefits in number five above as appropriate based on the manner in which the ICR is developed and the sum of which is included in the invoice to the CWD. For example, if the total support operating costs in the numerator are associated with the total probation department (adult probation and juvenile probation), then the denominator would include the total salary base for both adult and juvenile probation. The CPD should verify the components included in the ICR to ensure there is no overlap of costs included in ICR and discount rate. **Example Calculation display for ICR:**

Numerator: Overhead, administrative and support costs (DO NOT include those salaries included in the denominator, or any other non-Title IV-E supervisor salaries for other probation divisions)

Divided by

Denominator: Salary Base (Total salary and benefits for all case-carrying juvenile workers that serve both Title IV-E and non-Title IV-E cases)

NOTE: The CPD must ensure “like” costs are ALL either direct charged, OR included in the ICR; “like” costs reported in both methods is not allowable. The salary base included in the ICR must be consistent as in number three (3) above. Support staff must time study/certify in order to be included in the salary pool.

*All Program codes listed that have a federal share have the nonfederal discount rate applied.

PC	PC Title	Function	Direct Charge Code	Funding Source	Sharing Ratio Fed/State/Reimbursement/County	Description of Program Codes	Notes
Probation Only	Probation County Only	N/A	Yes	County Only	00/00/00/100	Includes unallowable Title IV-E activities for candidacy, youth in detention, and other governmental/probation work not eligible for Title IV-E reimbursement. Includes, but is not limited to , correctional (criminal) court related activities, and other law enforcement activities such as: filing petitions or dispositions related to a criminal offense, booking activities, and administering drug tests. Also, this code is for working with youth NOT at imminent risk of removal, youth while in an unallowable setting, or supervising and monitoring youth performing an unallowable activity. Unallowable settings include detention, secure placements, boot camps, ranches and facilities for whom probation has final administrative control. Note: This is a county probation-use only code.	This code is county probation use only. This code does not appear on the CEC.
Generic	Generic	N/A	Yes	County Only	00/00/00/100	Includes time spent by probation officers performing general administrative activities that essentially provide a department-wide benefit such as developing a manual on casework procedures. This also includes time spent training or in conference or staff meetings when the subject has department-wide benefit or cannot be identified to a specific program. This code is not to be used when performing case management activities, which continue to be recorded to the associated program.	Hours claimed to this code should be proportionately reallocated to all codes. This code does not appear on the CEC.
004	Probation/Peer Review (PR)	SS	Yes	Title IV-E	50/35/00/15	Includes county probation officer activities associated with preparation, coordination, training, review time and travel/per diem expenses for staff participating in the PR process. The purpose of the PR is to learn, through intensive examination of county child welfare practices, how to improve child welfare services and practices, both in the participating county and in other counties.	All General Fund (GF) expenditures will be transferred to county-only share due to 2011 Realignment. See CFL No. 11/12-18 for additional information.

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PC	PC Title	Function	Direct Charge Code	Funding Source	Sharing Ratio Fed/State/Reimbursement/County	Description of Program Codes	Notes
127	Probation Title IV-E Case Management	SS	Yes	Title IV-E	50/00/00/50	<p>NOTE: If case management activities are being performed for youth that are in detention, or are not in a foster care placement, these activities are to be claimed to the "Probation Only" code. If youth is a candidate, use PC 128.</p> <p>Allowable activities include activities when the child is in out-of-home placement. Included is the development of the case plan, which indicates specific services necessary to meet the protective needs of the child. The following are allowable activities performed on behalf of youth in out-of-home placement: Assessing child's/family's needs and developing a case plan as indicated in regulations; referral to services; working with foster parents or facilities to prepare them to receive a child; monitoring progress in meeting case plan objectives and updating the case plan; management and supervision of the case, participation in case conferences, permanency planning meetings and administrative reviews; recruitment activities, developing and distributing resource material, consulting and coordinating with service providers and community based organizations; visits for non-group home Foster Care placements (i.e.: relatives and foster family homes); pre-adoptive applicant screening; child adoptability assessment for foster youth in placement; Title IV-E allowable court related activities that are non-correctional (non-criminal) for probation supervised Foster Care youth; and travel time associated with any of the above activities.</p> <p>Also, includes activities related to preparing for determination of a child's eligibility for Foster Care. Examples: Gathering and verifying information to be used by the County Welfare Department Eligibility Worker regarding income, parental deprivation, resources, social security numbers, birth certificates and child support; and filling out/processing required forms; querying systems, records and other staff for current Aid to Families with Dependent Children status.</p>	This code is used on behalf of the youth in a placement and applied the FC non-federal discount rate.

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PC	PC Title	Function	Direct Charge Code	Funding Source	Sharing Ratio Fed/State/Reimbursement/County	Description of Program Codes	Notes
128	Probation Title IV-E Pre-Placement Prevention	SS	Yes	Title IV-E	50/00/00/50	<p>NOTE: If youth is in a foster care placement, charge eligible activities to PC 127. If youth is placed in detention for any reason, this youth is not considered to be a candidate and the activities associated with the youth are not considered pre-placement and are to be claimed under the "Probation Only" code.</p> <p>This PC and its activities are specific to time spent on allowable activities directed to a candidate for Foster Care. A candidate is a youth who is at imminent risk of removal from home and will be immediately placed in a Foster Care setting. The following are allowable activities after candidacy determination has been made: Assessing child's/family's needs and developing a case plan as indicated in regulations after it has been determined that the youth is a candidate for Foster Care; referrals to services when necessary; monitoring progress in meeting case plan objectives and updating the case plan; management and supervision of the case, participation in case conferences and administrative reviews; developing and distributing resource material, consulting and coordinating with service providers and community based organizations; on-going assessment and determination for candidacy; arranging for pre-placement visits; Title IV-E allowable court related activities that are non-correctional (non-criminal) and travel time associated with any of the above activities.</p>	This code is applied the FC non-federal discount rate.

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PC	PC Title	Function	Direct Charge Code	Funding Source	Sharing Ratio Fed/State/Reimbursement/County	Description of Program Codes	Notes
130	Probation Title IV-E Training	SS	Yes	Title IV-E	75/00/00/25	Costs are funded at the enhanced federal reimbursement rate of 75 percent for staff employed or preparing for employment with the Probation Department. Includes participation in long-term or short-term continuous training provided by outside agencies, training conferences or preparing for or providing Title IV-E training to Probation staff. Training is limited to topics necessary for performing the following specific Foster Care functions: Referral to services; case plan development; case management and supervision; preparation for and participation in judicial determinations; placement of the child; case reviews; recruitment and licensing of foster homes and institutions; eligibility determinations, and travel costs related to any of these above activities.	Training must be included in the Title IV-B State Plan. The enhanced rate is for the approved population and activities listed in 45 CFR 1356.60.
131	Probation Title IV-E Licensing	SS	Yes	Title IV-E	50/00/00/50	Allowable activities include recruitment, study, certification and licensing of relative and/or foster family homes; re-certification, renewal, suspension, revocation and complaint investigation actions affecting licensing; providing public information on out-of-home care programs and supporting participation of the public in such care; licensing information/data system activities; and travel related to any of these activities.	

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PC	PC Title	Function	Direct Charge Code	Funding Source	Sharing Ratio Fed/State/Reimbursement/County	Description of Program Codes	Notes
132	Probation Title IV-E Adoptions Assistance Program (AAP)	SS	Yes	Title IV-E	50/00/00/50	<p>Allowable activities include those directed to a child in adoptive placement or activities immediately preceding an adoptive placement, such as a child adoptability assessment (in cases where a Foster Care home is the pre-adoptive placement), home study and AAP assessment, and other adoption case planning activities. Use for activities generally supportive of the county's AAP after the termination of parental rights.</p> <p>Includes activities related to preparing for determination of a child's eligibility for the Adoption Assistance Program. Not actual eligibility determination. For example: Gathering and verifying information to be used by the County Welfare Department (CWD) Eligibility Worker regarding income, parental deprivation, resources, social security numbers, birth certificates and child support; filling out and processing necessary forms required by the CWD; querying systems, records and other staff for current Aid to Families with Dependent Children status; and travel time associated with any of the above activities.</p>	In cases where the Foster Care home is the pre-adoptive placement, the social worker must determine status of youth and claim activities accordingly.
576	Probation Title IV-E Training-Administration	SS	Yes	Title IV-E	50/00/00/50	<p>Used for claiming the costs of training Title IV-E CPD staff other than those described in code 130. Only eligible for federal funding at the 50 percent rate provided the staff are employed by CPD to perform a Title IV-E administrative function and the training is necessary for such staff to perform the Title IV-E administrative activities (i.e.: multi-disciplinary teams).</p> <p>Any training that only benefits probation-only programs, including correctional (criminal) or non-Title IV-E programs must be claimed under the "Probation Only" code.</p>	Only the training/portion of the training that is for employees that benefit Title IV-E are allocable to Title IV-E.

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PC	PC Title	Function	Direct Charge Code	Funding Source	Sharing Ratio Fed/State/Reimbursement/County	Description of Program Codes	Notes
579	Monthly Visits/Group Home Probation	SS	Yes	Title IV-E	50/50/00/00	Includes those activities performed by Probation Officers when providing monthly visits to all children placed in group homes (in and out-of-state), includes travel time associated with these activities.	This separate code (apart from 127) is needed to recognize the state share. Per Diem is allowed to be claimed to PC 579 since GHMV is a case management function. All GF expenditures will be transferred to county-only share due to 2011 Realignment. See CFL 11/12-18 for additional information.
581	Non-federal Monthly Visits/Group Home Probation	SS	Yes	Non-federal	00/100/00/00	Captures non-federal probation cost in PC 579 after the non-federal discount rate is applied for activities associated with the monthly visits.	All General Fund (GF) expenditures will be transferred to county-only share due to 2011 Realignment. Refer to CFL No. 11/12-18 for additional information. This is not a direct charge code, costs inputted into this code are a result from the application of the FC non-federal discount rate.
703	Child Welfare Services Outcome Improvement Project (CWSOIP)- Probation	SS	Yes	Title IV-E	50/50/00/00	This includes federally eligible Title IV-E activities required to implement the System Improvement Plans. Activities include but are not limited to: Implementing new procedures; providing special training to staff or caregivers; conducting focused/targeted recruitment of caregivers; improving coordination between public and/or private agencies; reducing high worker caseloads; increasing clerical or paraprofessional support; implementing permanency and youth transition practice improvements; implementing additional home visits; enhancing and/or expanding family finding efforts, and developing better methods and procedures for collecting and analyzing data; improving internal communication and information sharing; and improving oversight of social workers.	All GF expenditures will be transferred to county-only share due to 2011 Realignment. See CFL No. 11/12-18 for additional information.

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PC	PC Title	Function	Direct Charge Code	Funding Source	Sharing Ratio Fed/State/Reimbursement/County	Description of Program Codes	Notes
704	CWSOIP-Probation Non-federal	SS	Yes	Non-federal	00/100/00/00	These activities are required to implement the county improvement plans and include services provided to a child and/or the child's family. The range of service activities include but are not limited to: Emergency/temporary in-home caretakers; therapeutic day services; teaching and demonstrating to homemakers; parenting training services and respite care.	All GF expenditures will be transferred to county-only share due to 2011 Realignment. See CFL No. 11/12-18 for additional information.
788	Probation Non-Related Legal Guardian (NRLG) (UNDER 18)	SS	Yes	Non-federal	00/50/00/50	This code is for case management activities for NRLGs. Activities include but are not limited to: developing and updating written assessment and case plan, and conducting caseworker visits.	All General Fund (GF) expenditures will be transferred to county-only share due to 2011 Realignment. See CFL No. 11/12-18 for additional information.
789	Probation NRLG Non-Minor Dependent (NMD)	SS	Yes	Non-federal	00/50/00/50	This code is for case management activities for NRLGs participating in EFC. Activities include but are not limited to: developing and updating written assessment and case plan, and conducting caseworker visits.	All GF expenditures will be transferred to county-only share due to 2011 Realignment. See CFL No. 11/12-18 for additional information.
790	Probation Non-Related Extended Family Member (NREFM) (UNDER 18)	SS	Yes	Non-federal	00/50/00/50	Assessing the nonrelative caregiver suitability, performing criminal records checks, checking for prior child abuse/neglect allegations, and completing in-home safety inspections. Also includes time spent responding to nonrelative concerns and other tasks related to the nonrelative grievance procedure process. This code is to be used for the activities performed on behalf of NREFMs that are under age 18.	All GF expenditures will be transferred to county-only share due to 2011 Realignment. See CFL No. 11/12-18 for additional information.

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PC	PC Title	Function	Direct Charge Code	Funding Source	Sharing Ratio Fed/State/Reimbursement/County	Description of Program Codes	Notes
791	Probation NREFM NMD	SS	Yes	Non-federal	00/50/00/50	Assessing the nonrelative caregiver suitability, performing criminal records checks, checking for prior child abuse/neglect allegations, and completing in-home safety inspections. Also includes time spent responding to nonrelative concerns and other tasks related to the nonrelative grievance procedure process. This code is to be used for the activities associated with NREFMs over age 18 (NMDs).	All GF expenditures will be transferred to county-only share due to 2011 Realignment. See CFL No. 11/12-18 for additional information.
818	Extended Foster Care (EFC) Non-federal Group Home Monthly Visits (GHMV) Probation	SS	Yes	Non-federal	00/100/00/00	Captures non-federal probation cost in PC 844 after the non-federal discount rate is applied for activities associated with the monthly visits. This program code is specific for the youth participating in Extended Foster Care (ages 18-21) enacted by Assembly Bill 12 (Chapter 559, Statutes of 2010).	Mirrors Program Code (PC) 581. This is not a direct charge code, costs inputted into this code are a result from the application of the FC non-federal discount rate to PC 844.
844	EFC GHMV Probation	SS	Yes	Title IV-E	50/50/00/00	Please refer to PC 579's description for allowable activities. This program code is specific for the youth participating in Extended Foster Care (ages 18-21) enacted by Assembly Bill 12 (Chapter 559, Statutes of 2010).	Mirrors PC 579. All GF expenditures will be transferred to county-only share due to 2011 Realignment. See CFL No. 11/12-18 for additional information.
851	EFC Probation Case Management	SS	Yes	Title IV-E	50/00/00/50	Please refer to PC 127's description for allowable activities. This program code is specific for the youth participating in Extended Foster Care (ages 18-21) enacted by Assembly Bill 12 (Chapter 559, Statutes of 2010).	Mirrors PC 127
854	EFC Probation Training	SS	Yes	Title IV-E	75/00/00/25	Please refer to PC 130's description for allowable activities. This program code is specific for the youth participating in Extended Foster Care (ages 18-21) enacted by Assembly Bill 12 (Chapter 559, Statutes of 2010).	Mirrors PC 130
855	EFC Probation Training-Administration	SS	Yes	Title IV-E	50/00/00/50	Please refer to PC 576's description for allowable activities. This program code is specific for the youth participating in Extended Foster Care (ages 18-21) enacted by Assembly Bill 12 (Chapter 559, Statutes of 2010).	Mirrors PC 576

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PC	PC Title	Function	Direct Charge Code	Funding Source	Sharing Ratio Fed/State/Reimbursement/County	Description of Program Codes	Notes
889	Resource Family Approval Probation	SS	Yes	Title IV-E	50/35/00/15	<p>The time study code includes activities performed for a resource family applicant or an approved resource family (Resource families may be related or non-related caregivers). Pre-approval activities include resource family recruitment, the comprehensive assessment as described in the Resource Family Written Directives including but not limited to background checks clearances and assessment, home environment assessment, permanency assessment, pre-approval training, written assessment, activities related to emergency placement and placement based on a compelling reason, information and data system activities, and travel related to any of these activities. Background check clearances include Child Welfare Services Live Scan/California Law Enforcement Telecommunications System, Child Abuse Index searches, Federal Bureau of Investigation and California Department of Justice databases background checks for criminal records). Activities may also include tasks associated with the provision of information to resource families including their rights to a due process.</p> <p>This code also includes training costs for staff development. Training activities also include preparing and providing training to prospective resource families on requirements and continued training after pre-approval training. Post approval activities include the resource family annual update, post approval training, rescinding approval, monitoring, and investigating complaints and serious incident reports. Training expenditures will be reimbursed with federal financial participation at 50 percent and 75 percent (enhanced rate) for allowable activities.</p>	Effective December 2013 pending approval of the Title IV-E state plan. All GF expenditures will be transferred to county-only share due to 2011 Realignment. See CFL 11/12-18 for additional information.
917	Probation IV-E Waiver Evaluation	SS	Yes	Title IV-E	50/00/00/50	<p>This code is available to capture staff time participating in the collection of Title IV-E Waiver evaluation information during face-to-face meetings, conference calls or in completing specific forms for the Title IV-E Waiver evaluation.</p>	Only to be used by Title IV-E California Well-Being Project counties.

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PC	PC Title	Function	Direct Charge Code	Funding Source	Sharing Ratio Fed/State/Reimbursement/County	Description of Program Codes	Notes
921	Probation Services/ Nonfederal	SS	Yes	County Only	00/00/00/100	<p>The CPDs approved to participate in the Project will claim costs incurred for additional services provided to children, youth and families as a direct result of approved optional interventions to PIN 921059. Claims for these services are not claimable with the current Title IV-E claiming structure. The PIN 921059 will be deleted effective at the end of the Project.</p> <p>The CPDs approved to participate in the Project will claim costs incurred for additional services provided to children, youth and families as a direct result of SOP/CPM case management to PIN 921076. The PIN 921076 will be deleted effective at the end of the Project.</p>	Only to be used by Title IV-E California Well-Being Project counties.