



CDSS

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November 4, 2011

COUNTY FISCAL INFORMATION NOTICE (CFIN) NO. 08-2011

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

SUBJECT: TITLE IV-E CLAIMING INSTRUCTIONS FOR COUNTY
PROBATION DEPARTMENTS (CPDs)

REFERENCE: COUNTY FISCAL LETTER (CFL) NO. 11/12-18, DATED
SEPTEMBER 16, 2011; CFL NO. 08/09-47, DATED
MARCH 27, 2009; CFL NO. 07/08-35, DATED
DECEMBER 21, 2007; CFL NO. 07/08-24, DATED
OCTOBER 1, 2007; CFL NO. 04/05-29, DATED
OCTOBER 6, 2004; ALL COUNTY LETTER (ACL) NO. 00-22,
DATED MARCH 27, 2000; ACL NO. 99-96, DATED
NOVEMBER 2, 1999; CFL NO. 98/99-19, DATED
SEPTEMBER 25, 1998; CFL NO. 92/93-02, DATED JULY 1, 1992;
CFL NO. 90/91-58, DATED MARCH 21, 1991; 45 CODE OF
FEDERAL REGULATIONS (CFR) SECTION 74.20; WELFARE
AND INSTITUTIONS CODE (W&IC) SECTION 11460(A);
ELIGIBILITY AND ASSISTANCE STANDARDS (EAS) 45-202.612;
EAS 45-203.512

This letter transmits a comprehensive package of existing claiming instructions for CPDs for eligible costs and activities related to the pass-through of federal Title IV-E funds. This comprehensive claiming information will assist CPDs in identifying allowable costs and activities that should be reported to the various claim codes.

Background

As outlined in CFL No. 92/93-02, dated July 1, 1992, the California Department of Social Services (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 at risk of Foster Care placement.

To obtain the pass-through Title IV-E funds, a Memorandum of Understanding (MOU) must be developed and implemented between the County Welfare Department (CWD) and the CPD. The MOU outlines the roles and responsibilities of each department regarding the pass-through of the Title IV-E funds (reference ACL No. 00-22, dated March 27, 2000 and ACL No. 99-96, dated November 2, 1999). The MOU also defines the method that will be used to develop an indirect cost rate proposal or cost allocation plan, time study requirements, the process of notifying the CWD of claimable expenditures, how the funds will be disbursed, the billing methodology, and compliance with federal program requirements.

Foster Care board and care costs for probation supervised children placed in Foster Care are paid by the CWD. For the 56 non-Title IV-E Waiver counties, Foster Care is an entitlement program and the board and care costs are not capped. Title IV-E funds for eligible cases are provided to the CWD for these costs.

In July 2007, Alameda County and Los Angeles County implemented the Title IV-E Waiver Capped Allocation Project (CAP). Under the CAP, participating counties received a waiver of federal regulations regarding the use of Title IV-E funds, allowing the counties to spend Title IV-E funds on some normally disallowed administration and Foster Care board and care costs. In exchange for the funding flexibility, counties agreed to receive a capped allocation for both the administration and Foster Care program costs. The CAP also allows any savings to be rolled over from one fiscal year to the next. Specific claiming instructions for counties participating in the CAP were issued, which described how to claim Title IV-E for the CAP costs (reference CFL No.07/08-35, dated December 21, 2007 and CFL No. 07/08-24 dated, October 1, 2007).

Allowable Administrative Activities

Certain administrative activities performed by Probation Officers on behalf of federally eligible children in Foster Care or at risk of Foster Care placement are eligible for Title IV-E reimbursement. Since CPD staff also performs activities that are unallowable for Title IV-E reimbursement, staff must complete a time study to account for time spent on the allowable and unallowable Title IV-E activities. The allowable activities are reported to the Program Codes (PCs) listed in this letter. The time study hours are used to develop ratios that are applied to the salary and benefit costs of CPD staff to allocate the costs to the appropriate programs and to identify the amount that can be claimed to Title IV-E.

As outlined in CFL No. 92/93-02, dated July 1, 1992, each county decides which agency, CWD or CPD, retains the time study records for audit documentation purposes. If it is determined that 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 listed under the appropriate

PC on an invoice that is sent to the CWD. Only the invoice is sent to the CWD. There is no need to report the time study hours on the invoice. If the CWD agrees to retain the time study records, the same time study process is completed by the CPD, but instead of retaining the records, the CPD sends them to the CWD with the invoice. As outlined in 45 CFR Section 74.20, the time study documents must be retained for three years and produced in the event of a federal, state, county, or A-133 audit.

PROBATION ACTIVITIES

Below is a list of Title IV-E eligible administrative activities by the Probation PC. PC 702 is only for use by Title IV-E Waiver counties to report costs that cannot be claimed to the conventional Title IV-E codes and are, therefore, reimbursed using the CAP funds.

004 Probation/Peer Quality Case Review (PQCR)

Includes activities associated with preparation, coordination, training, review time, and travel/per diem expenses for staff participating in the PQCR process. The purpose of the PQCR 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. Costs associated with probation officer activities should be charged to PC 004, Probation PQCR.

119 Public Agency IV-E Pass Through

In addition to normal case management activities for children already in the child welfare services system, the federal government allows Title IV-E reimbursement for administrative activities associated with pre-placement prevention for cases that would go into out-of-home care absent the referral to services. The CDSS allows counties with an authorized MOU to pass on Title IV-E funds to other county public agencies, such as Probation and Mental Health that perform eligible administrative activities for children at risk of or currently placed in Foster Care. This pass through provision does not apply to similar activities performed by private non-profit organizations.

Counties that establish a multi-agency team must prepare a MOU between the CWD and the other public agency. Counties must submit a certification form to CDSS that certifies that the county will adhere to the applicable provisions associated with claiming Title IV-E reimbursement for pre-placement prevention and will assume responsibility for any future disallowances. Counties may not begin claiming until a letter of acknowledgement has been received from CDSS that indicates the earliest date in which claiming can begin. The PC/Program Identifier Number (PIN) 119069 shall be used to claim reimbursement for eligible

Title IV-E administrative activities. The county share may be provided by the other public agency performing the eligible administrative activities provided that the funds used as the county share meet all matching requirements for Title IV-E, and are not used as match for any other federal or state fund source.

127 Probation IV-E Case Management

Includes activities directed to a specific child when the child remains in the home or 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:

Assessing child's/family's needs and developing a case plan as indicated in regulations; referral to services when necessary; arranging for pre-placement visits; 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; court document preparation or petition filing; visits for non-group home Foster Care placements (i.e.: relatives and foster family homes); and travel time associated with any of the above activities.

128 Probation IV-E Pre-Placement Prevention

The following are allowable activities:

Assessing child's/family's needs and developing a case plan as indicated in regulations; 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; and travel time associated with any of the above activities.

129 Probation IV-E Eligibility

Includes activities related to preparing for determination of a child's eligibility for the Foster Care or Adoption Assistance Program. Not actual eligibility determination. For example:

Gathering and verifying information used by the Eligibility Worker regarding income, parental deprivation, resources, social security numbers, birth certificates, and child support; filling out and processing necessary forms; querying systems, records, and other staff for current Aid to Families with Dependent Children status; preparing and conducting Title IV-E eligibility reviews; and travel time associated with any of the above activities.

130 Probation IV-E Training

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 continuing 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

131 Probation IV-E Licensing

Allowable activities include recruitment, study, certification, and licensing of foster family homes and Foster Care institutions; 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.

132 Probation IV-E Adoptions

Allowable activities include directed to a child in adoptive placement or activities immediately preceding an adoptive placement, such as a child adoptability assessment, adoptive applicant screening, home study, and Adoptions Assistance Program assessment, and other adoption case planning activities. Use for activities generally supportive of the county's adoption program.

576 Probation IV-E Training – Administration

Used for claiming, the costs of training any CPD staff other than those described in code 130. Only eligible for federal funding at the 50 percent rate provided the staff are contracted 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).

579 Probation Monthly Group Home Visits

Includes those activities performed by Probation Officers when providing monthly visits to all children placed in group homes (in and out-of-state).

702 Probation IV-E Waiver – **(To be used only by Title IV-E Waiver CAP counties)**

Used for claiming of services under the CAP by participating counties. Includes any activities related to providing social services to the child, the child's family, or foster family or any other costs not normally eligible for Title IV-E funding. These activities include but are not limited to::

Providing counseling, treatment, or other direct services to children, their families, and significant others to improve or remedy personal problems, behaviors, or home conditions and to implement the services plan including negotiating, mediating, and participating in problem solving services.

Administrative activities associated with training, licensing, and the Statewide Automated Child Welfare Information System are excluded from the Waiver and should be claimed using existing PCs.

703 Child Welfare Services Outcome Improvement Plan (CWSOIP) Probation

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.

704 CWSOIP Probation Nonfederal

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.

CLAIMING PCs AND PINs

As described in CFL No. 11/12-18, dated September 16, 2011, and in conjunction with the County Welfare Directors Association (CWDA), it was agreed to continue the normal claiming process for administrative costs for programs affected by Assembly Bill 118. For the County Expense Claim (CEC) process, counties will still be required to claim the costs expended for each of the realigned programs to the appropriate PCs, which will allow CDSS to monitor the expenditures for reporting purposes and to continue calculating the Realignment 1991 Growth calculation.

Effective with the September 2011 quarter claim, all costs will be covered by the county with realignment funding using the State-Use-Only (SUO) overmatch codes. This will be accomplished by setting the affected allocation's ledger to zero for the realigned program ledgers.

PC 004 Probation/PQCR
PIN 004059 Probation Expenses
PC 004 costs will be funded at 50/35/00/15 (Federal/State/Health/County).
The federally funded components will be subject to the non-federal discount rate, via PC 718, that is calculated on the CEC.

PC 119 Public Agency IV-E Pass Through
PIN 119069 Federal Pass-Through
PC 119 costs will be funded at 50/00/00/50 (Federal/State/Health/County).

PC 127 Probation IV-E Case Mgmt
PIN 127059 Probation Expenses
PIN 127088-91 Support Operating
PIN 127092 Casework OT/CTO Costs
PIN 127093 Support Staff OT/CTO Costs
PIN 127094 Start Up/Nonrecurring Costs
PC 127 costs will be funded at 50/00/00/50 (Federal/State/Health/County).

PC 128 Probation IV-E Pre-placement
PIN 128059 Probation Expenses
PIN 128088-91 Support Operating
PIN 128092 Casework OT/CTO Costs
PIN 128093 Support Staff OT/CTO Costs
PIN 128094 Start Up/Nonrecurring Costs
PC 128 costs will be funded at 50/00/00/50 (Federal/State/Health/County).

PC 129 Probation IV-E/Eligibility
PIN 129059 Probation Expenses
PIN 129088-91 Support Operating
PIN 129092 Casework OT/CTO Costs
PIN 129093 Support Staff OT/CTO Costs
PIN 129094 Start Up/Nonrecurring Costs
PC 129 costs will be funded at 50/00/00/50 (Federal/State/Health/County).

PC 130 Probation IV-E Training
PIN 130059 Probation Expenses
PIN 130088-91 Support Operating
PIN 130092 Casework OT/CTO Costs
PIN 130093 Support Staff OT/CTO Costs
PIN 130094 Start Up/Nonrecurring Costs
PC 130 costs will be funded at 75/00/00/25 (Federal/State/Health/County).

PC 131 Probation IV-E/Licensing
PIN 131059 Probation Expenses
PIN 131088-91 Support Operating
PIN 131092 Casework OT/CTO Costs
PIN 131093 Support Staff OT/CTO Costs
PIN 131094 Start Up/Nonrecurring Costs
PC 131 costs will be funded at 50/00/00/50 (Federal/State/Health/County).

PC 132 Probation IV-E/Adoptions
PIN 132059 Probation Expenses
PIN 132088-91 Support Operating
PIN 132092 Casework OT/CTO Costs
PIN 132093 Support Staff OT/CTO Costs
PIN 132094 Start Up/Nonrecurring Costs
PC 132 costs will be funded at 50/00/00/50 (Federal/State/Health/County).

PC 576 Probation IV-E Training Admin
PIN 576059 Probation Expenses
PC 576 costs will be funded at 50/00/00/50 (Federal/State/Health/County).

PC 579 Probation Mo Visits/Group Home
PIN 579059 Probation Expenses
PC 579 costs will be funded at 50/50/00/00 (Federal/State/Health/County).
All General Fund (GF) expenditures will be transferred to county-only share via SUO code 329.

PC 702 IV-E Waiver Probation
PIN 702059 Probation Expenses
PC 702 costs will be funded at 50/00/00/50 (Federal/State/Health/County).

PC 703 CWSOIP - Probation
PIN 703059 Probation Expenses
PC 703 costs will be funded at 50/50/00/00 (Federal/State/Health/County).
All GF expenditures will be transferred to county-only share via SUO code 705.

PC 704 CWSOIP - Probation Nonfederal
PIN 704059 Probation Expenses
PC 704 costs will be funded at 00/100/00/00 (Federal/State/Health/County).
All GF expenditures will be transferred to county-only share via SUO code 705.

If you have any questions regarding this CFIN, please direct them to the Fiscal Systems Bureau at fiscal.systems@dss.ca.gov. If you have any questions regarding Realignment please direct them to: CDSSAB118@dss.ca.gov.

Sincerely,

Original Document Signed By:

JANE CHRISTOPHERSON
Branch Chief
Estimates Branch

c: CWDA