

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 21-47

This All County Letter is intended to provide guidance to county child welfare and probation agencies, and tribes with a Title IV-E agreement with the State (IV-E agencies), on the prevention services program authorized by Part I of the Family First Prevention Services Act (FFPSA), and to provide guidance to IV-E agencies on Transition Grants and Funding Certainty Grants authorized by the Family First Transition Act (FFTA), including required and recommended uses and reporting requirements for both grant programs, and the allocation methodology for Transition Grant funds.



KIM JOHNSON
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



GAVIN NEWSOM
GOVERNOR

April 20, 2021

ALL COUNTY LETTER NO. 21-47

TO: COUNTY WELFARE DIRECTORS ASSOCIATION (CWDA)
CHIEF PROBATION OFFICERS OF CALIFORNIA (CPOC)
ALL COUNTY CHILD WELFARE DIRECTORS
ALL COUNTY BOARD OF SUPERVISORS
ALL TITLE IV-E AGREEMENT TRIBES
ALL COUNTY TREASURERS

SUBJECT: FAMILY FIRST TRANSITION ACT (FFTA) TRANSITION GRANT
AND FUNDING CERTAINTY GRANT FOR THE FAMILY FIRST
PREVENTION ACT (FFPSA)

REFERENCE: [FAMILY FIRST PREVENTION SERVICES ACT PL 115-123;](#)
[FAMILY FIRST TRANSITION ACT](#) ; [ADMINISTRATION ON](#)
[CHILDREN, YOUTH AND FAMILIES \(ACYF\) – CHILDREN'S](#)
[BUREAU \(CB\) - INFORMATION MEMORANDUM \(IM\)-20-](#)
[01](#); [ACYF-CB-PI-20-04](#); [ACYF-CB-PI-20-08](#);

The purpose of this All County Letter (ACL) is to provide guidance to county child welfare, probation agencies, and tribes with a Title IV-E agreement with the State (IV-E agencies) on the prevention services program authorized by Part I of the Family First Prevention Services Act (FFPSA).

Specifically, this ACL will discuss the following:

- The prevention services program authorized by Part I of FFPSA
- The Family First Transition Act (FFTA) background and allocation overview

- Data reporting requirements, allowable and recommended uses of Transition Grant and Funding Certainty Grant funds

Two separate County Fiscal Letters will be available soon to provide additional information on 1) the allocation methodology, award amounts, and claiming codes for the Transition Grant, and 2) the allocation methodology, award amounts, and claiming codes for the Funding Certainty Grant.

BACKGROUND

Family First Prevention Services Act (FFPSA), Part I

The prevention services program authorized in Part I of the FFPSA, reflects a shift in the focus of child welfare from response to prevention in a way that maximizes available funding, promotes trauma-informed, evidence-based practices, keeps families intact, and encourages cross-system collaboration to prevent children from being removed into foster care.

Part I of the FFPSA provides a new opportunity for participating Title IV-E agencies to draw down IV-E funds for prevention services for qualifying children, youth, and their parents or kin caregivers, to prevent entry or reentry into the foster care system. Eligible prevention services include qualifying substance abuse, mental health, and in-home parenting skills services included in a state's approved five-year prevention plan outlining a state's approach to prevention services and plans to comply with federal requirements. The California Department of Social Services (CDSS) is partnering with stakeholders to develop the California Five-Year Prevention Plan, which will include more details on the proposed State Prevention Services Program as well as guidance on how Title IV-E programs can provide prevention services under FFPSA.

For a more comprehensive description of the Family First Prevention Services Act and guidance, please visit the [Children's Bureau website](#). An All County Letter will be forthcoming and will address the county opt-in requirements for prevention services under FFPSA. The CDSS will engage and consult with Indian tribes to develop procedures for tribes with state IV-E agreements to opt-in to provide prevention services under FFPSA.

Family First Transition Act (FFTA)

In December of 2019, the federal government enacted P.L. 116-94 which included the FFTA. The FFTA enacted the following provisions:

- Modified the effective date for the legislative mandate that at least 50 percent of payments for prevention services be for evidence-based programs rated “well supported” by the Title IV-E Prevention Services Clearinghouse. This requirement will instead be phased in beginning in federal fiscal year (FFY) 2022 through FFY 2023, throughout which time expenditures for prevention services rated “supported” may count alongside “well-supported” services toward the 50 percent “well-supported” requirement which will become fully effective beginning FFY 2024.
- Authorized two funding sources:
 - Transition Grants: one-time, flexible grants to states and eligible tribes to support implementation of the FFPSA, child welfare waiver demonstration project transitional activities, and purposes allowable under Title IV-B of the Social Security Act, available for expenditure through Federal Fiscal Year (FFY) 2025.
 - Funding Certainty Grants: payments to Title IV-E agencies that operated a Title IV-E Child Welfare Waiver Demonstration Project, to offset any shortfall in Title IV-E funding for FFYs 2020 and 2021.

FAMILY FIRST TRANSITION ACT (FFTA) TRANSITION GRANT ALLOCATION

The State of California has received a \$49,100,434 Transition Grant to support implementation of the Family First Prevention Services Act and other activities. A portion of the funds, \$5,287,000, will be retained by the CDSS to finance the development of statewide standards, processes, and tools that support a coordinated approach to prevention services.

The CDSS will use the retained funds for state activities, including the following:

- Implementation of an interim data collection and automation system to decrease ongoing annual manual reporting.
- Development of a statewide plan for continuous quality improvement (CQI) and model fidelity in order to outline a clear method that allows for statewide oversight. Counties must align the CDSS process and the county CQI processes that are currently in place in order to develop a prevention specific CQI and model fidelity process.
- Development of a training approach and training tools to train agencies and providers to participate in the State's prevention services program.

The remaining FFTA Transition Grant funds will be allocated to county child welfare agencies using the distribution method for Title IV-B Promoting Safe and Stable Families (PSSF) funds, adjusted to provide a minimum funding allocation, or “floor,” of \$100,000. Eligible state Title IV-E agreement Tribes will also receive the minimum floor. The CDSS will consult with state Title IV-E agreement Tribes on the process for

receiving FFTA Transition Grant Funds and any data collection necessary for federal reporting. Funds will be available for expenditure through Federal Fiscal Year 2025, per federal guidance. Counties must declare their intent to receive Transition Grant funds by submitting the attached Letter of Intent form by October 1, 2021.

The CDSS, in consultation with the County Welfare Directors Association, will monitor the county utilization of FFTA funds to determine if future county allocation adjustments are needed. If the CDSS and the County Child Welfare Directors Association determine county reallocation is necessary, then county allocations would be adjusted to ensure maximum expenditure of available funds.

A County Fiscal Letter providing additional information on the Transition Grant allocation methodology, award amounts, and claiming codes will be available soon. An additional County Fiscal Letter providing Title IV-E Child Welfare Waiver Demonstration Project (Title IV-E California Well-Being Project) counties with information on Funding Certainty Grants discussing allocation methodology, award amounts, and claiming codes will also be available soon.

PREVENTION SPENDING REQUIREMENTS AND RECOMMENDATIONS

Federal guidance ([ACYF-CB-IM-20-01, Administration for Children and Families \(ACF\) Program Instruction 20-04](#) and [ACF Program Instruction 20-08](#)) provides that Transition Act funds including Transition Grants and Funding Certainty Grants may be used for the following purposes:

- All purposes allowable under Title IV-B.
- Waiver demonstration project activities to reduce any adverse fiscal impacts as jurisdictions transition funding sources for the projects.
- Activities directly associated with the implementation of all parts of FFPSA.

Additionally, FFTA funds may not be used to match other federal funds from any program.

Allowable Expenditures

Although FFTA funding has broader allowable uses by counties, the CDSS, in consultation with CWDA, is requiring counties to use at least 50 percent of the Transition Grant funding to engage in prevention and/or early intervention planning, expand capacity for evidenced-based practices to support children, youth and families, and evaluation activities directly related to the implementation of FFPSA Part I and/or allowable purposes under Title IV-B. Examples of specific activities that counties can use the funding for include, but are not limited to following:

- Readiness assessments, gap analyses, development of service outcomes, and identification of workforce needs.
 - May include a prevention service inventory; defining target populations and mapping services to needs; determining funding sources and outcomes measured for existing services; and documenting any outcome measurement tools used to evaluate existing services.
- Build local capacity and infrastructure to support local prevention services or prevention activities such as expanding service contracts or addressing provider workforce.
- Establish, continue, or expand prevention and/or early intervention services to meet the needs of children and families identified through local planning processes.
- Evaluate evidence-based practices for inclusion in the Title IV-E Prevention Services Clearinghouse, or to improve a present rating in the Clearinghouse.
- Continuing and/or expanding prevention services with a “promising” clearinghouse rating
- Transition activities, for former waiver demonstration project counties, to transition to FFPSA prevention services.

After dedicating at least 50 percent of Transition Grant funding for these Part I prevention and/or early intervention activities, counties can use FFTA funding for any activities to support all parts of FFPSA, including implementation of Part IV, and any other activities allowable under FFTA.

DATA COLLECTION AND REPORTING FOR FFTA FUNDS

Counties must indicate planned uses of the funds on the attached Letter of Intent form (Attachment I) by October 1, 2021 and must agree to submit prevention and/or early intervention activities planning data to the CDSS for statewide data analysis. The Letter of Intent will provide the CDSS with a county’s intention to receive funds and indicate the general categories for which funding will be used. However, submitting the Letter of Intent does not require a county to opt-into FFPSA Part I. Please send the completed Letter of Intent via email to ffpsapreventionservices@dss.ca.gov .

Additionally, each county will be required to provide data to the CDSS documenting the prevention planning activities undertaken with the FFTA funds. This data will inform FFPSA strategic planning statewide. The CDSS will require each county to provide information regarding prevention and/or early intervention activities including, but not limited to the following:

- Characteristics of the prevention and/or early intervention program including:
 - Program Name

- Population the Program Serves; highlighting BIPOC and/or LGBTQ,
- Program Service Category
- Target population
- EBP outcomes such as:
 - Adult or Child Wellbeing
 - Child Safety
 - Child Permanency
 - Referral to Services
- Language(s) Program offers
- Program's Trauma Informed Approach
- Assessment tools used for model fidelity and/or CQI
- Indicate if the listed program is designed to serve expectant and/or parenting youth
- Cultural competencies
- Percentage for federal state county and other funding sources
- Total funding dollars used for the program
- If the program was previously waiver funded

The CDSS will provide a data reporting tool to be released in a future ACL.

Finally, county child welfare agencies are responsible for providing data to the CDSS for federal reporting in the Annual Progress and Services Report. Counties must report the following data to the CDSS to comply with federal reporting requirements:

- How funds are used to implement each part of the FFPSA.
- Detail all programs, services, and operational costs for which the grant is used.
- The characteristics of the families and children served.
 - For example, characteristics such as race, gender, risk and safety assessment scores, each evidence-based service's rate of engagement, case length, child placement and/or frequency of foster care reoccurrence.
- Previous Title IV-E child welfare waiver demonstration project counties will report the following:
 - Amount of funding used for each fiscal year to continue activities that were previously funded by the waiver.
 - Detail their plan for transition activities so that needed activities will be provided under the prevention services program.
 - If expenditures for the activities would not be eligible for payment under Title IV-E, agencies must list the reasons for ineligibility for Title IV-E payment and which funding sources will be used to cover the costs.
- Any additional information the U.S. Department of Health and Human Services requires.

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If you have questions or need additional guidance regarding the information in this letter, contact the Child Welfare Program and Policy Development Bureau at (916) 651-9129 or at ffpsapreventionservices@dss.ca.gov

Sincerely,

Original Document Signed By

ANGIE SCHWARTZ
Deputy Director
Children and Family Services Division

LETTER OF INTENT

_____, 2021
Date

California Department of Social Services
Attention: Child Welfare Policy and Program Development Bureau744
P Street, MS 8-11-87
Sacramento, CA 95814

Director Kim Johnson:

The purpose of this letter is to inform the California Department of Social Services (CDSS) that _____ County intends to receive to the Transition Grant (FFTA) funding for 2021 through 2025.

By choosing to participate in the Transition Grant funding _____ County understands they will receive funding through FFTA federal grant to start or continue performing activities related to FFPSA as outlined in All County Letter . As a condition of receiving the Transition Grant funding, the county commits to submitting data obtained through related prevention planning activities to the CDSS in order to enhance statewide planning efforts.

The _____ County intends to use Transition Grant funding for the following activities(select one or more boxes below and explain the activities per category including intended fund uses in a few sentences):

Prevention Planning Activities:

Building and Sustaining Local Capacity for Prevention and Early Intervention Services (consistent with Title IV-B allowable activities):

Evaluating Evidence-Based and Promising Practices:

Continuing or Expanding Evidence-Based and/or Promising Practices:

Transition Activities (Waiver Counties Only):

Part IV Requirements

Other Title IV-B activities

This Letter of Intent is only for Transition Grant funds available through federal fiscal year 2025.

The County Letter of Intent must be received by the Child Welfare Policy and Program Development Bureau on or before **October 1, 2021**.

Signature of Authorized County Representative

Date