

February 23, 2023

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 23-23

The purpose of this All County Letter (ACL) is to inform and provide guidance to county Agencies about the Family First Prevention Services (FFPS) Program in accordance with [Public Law \(PL\) 115-123](#) and Welfare and Institutions Code Sections [\(WIC §\) 16585 through 16589](#). This letter extends the submission deadline for Comprehensive Prevention Plans (CPP) to **July 31, 2023**, and provides the FFPS program Assurances Template. Additionally, this letter informs of the CPP approval process and the process to opt out of the FFPS program.



KIM JOHNSON
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

February 23, 2023

ALL COUNTY LETTER NO. 23-23

TO: ALL COUNTY CHILD WELFARE DIRECTORS
ALL CHIEF PROBATION OFFICERS
ALL CHILD WELFARE SERVICES PROGRAM MANAGERS
ALL COUNTY BOARDS OF SUPERVISORS
ALL BEHAVIORAL HEALTH AGENCIES

SUBJECT: **FAMILY FIRST PREVENTION SERVICES PROGRAM,
COMPREHENSIVE PREVENTION PLAN SUBMISSION
DEADLINE EXTENSION, COMPREHENSIVE PREVENTION
PLAN APPROVAL PROCESS AND FAMILY FIRST
PREVENTION SERVICES OPT OUT PROCESS**

REFERENCE: [FEDERAL BIPARTISAN BUDGET ACT OF 2018 \(PUBLIC LAW 115-123\)](#); [42 UNITED STATES CODE SECTION 671\(e\)](#); [WELFARE AND INSTITUTIONS CODE SECTIONS 16585-16589](#); [WELFARE AND INSTITUTIONS CODE SECTION 10553.1](#); [ASSEMBLY BILL 128 \(STATE BUDGET ACT OF 2021\)](#); [ASSEMBLY BILL 153 \(CHAPTER 86, STATUTES OF 2021\)](#); [COUNTY FISCAL LETTER 21/22-84](#); [COUNTY FISCAL LETTER 21/22-110](#); [ALL COUNTY INFORMATION NOTICE I-73-21](#); [ALL COUNTY LETTER 22-23](#)

The purpose of this All County Letter (ACL) is to inform and provide guidance to county Title IV-E Agencies about the Family First Prevention Services (FFPS) Program in accordance with [Public Law \(PL\) 115-123](#) and Welfare and Institutions Code Sections [\(WIC §\) 16585 through 16589](#). This letter extends the submission deadline for Comprehensive Prevention Plans (CPP) to **July 31, 2023**, and provides the FFPS Program Assurances Template. Additionally, this letter informs of the CPP approval process and the process to opt out of the FFPS program.

The California Department of Social Services (CDSS) will continue to collaborate with tribes who have entered into a Title IV-E agreement with the state pursuant to [WIC §10553.1](#) on the opt-in procedures, CPP development, assurances and provision of prevention services under the FFPS program.

BACKGROUND

The Family First Prevention Services Act (FFPSA) was enacted under the Federal [Bipartisan Budget Act of 2018](#). The [FFPSA Part I](#) allows states who opt in the ability to claim federal Title IV-E funds for eligible, evidence-based mental health and substance use prevention and treatment services and in-home parent education skill-based programs. Individuals eligible for Title IV-E prevention services include children at imminent risk of entry into foster care (“candidates” for foster care), their parents or kin caregivers, and pregnant or parenting youth in foster care.

In July of 2021, the FFPS program was established through the enactment of Assembly Bill ([AB](#)) [153](#) which added [WIC § 16585-16589](#). State implementation guidance for the FFPS program was released in All County Information Notice ([ACIN](#)) [I-73-21](#) and [ACL 22-23](#).

In furtherance of the state’s vision to create a prevention-focused child and family wellbeing continuum, [AB 128](#) within the [California Budget Act of 2021](#) appropriated \$222.4 million in state General Fund to support the FFPS program, currently referred to as the FFPS Program State Block Grant (SBG). The SBG provides funding for comprehensive prevention activities including, administrative activities, services, training and to assist in the development of a CPP. The SBG allocations can be found in County Fiscal Letter ([CFL](#)) [21/22-84](#).

The FFPS program is an opt in program for county and tribal Title IV-E agencies to develop and implement prevention services which encompasses Title IV-E prevention services established under FFPSA Part I and the continuum of comprehensive prevention services described in [WIC §16588\(c\)](#). Title IV-E agencies that chose to participate early in the FFPS program were required to submit a completed Letter of Intent (LOI) by April 30, 2022. The LOI informed CDSS of the county’s intent to submit a CPP and allowed the county to begin accessing their SBG allocation. Title IV-E Agencies that did not opt in early and have decided to participate in the FFPS program may still submit an approvable CPP to CDSS and access their SBG allocation upon approval.

DEADLINE EXTENSION FOR COMPREHENSIVE PREVENTION PLAN DEVELOPMENT

The CDSS has extended the CPP submission date from January 31, 2023, to **July 31, 2023**. The CDSS acknowledges that counties are in various stages of developing and implementing their CPP and may need additional time to develop their plans. This extension allows counties additional time to engage their cross-sector partners and ensure the inclusion of voices of those with lived experience in the development of the CPP. Counties who wish to submit their CPP earlier may still do so.

Counties must submit an approvable CPP to CDSS on or before **July 31, 2023**, to ffpsapreventionservices@dss.ca.gov.

The approved submission of a CPP from CDSS allows counties to begin or continue accessing their SBG allocation and Title IV-E prevention funds that will be available contingent upon the federal approval of the [State Five Year Prevention Plan](#).

Allocations for counties who do not choose to participate or opt out of the program will be reallocated to the remaining participating agencies. Additional information about the FFPS program including the CPP components, can be found in [ACL 22-23](#). The FFPS program claiming information including allowable activities can be found in [CFL 21/22-110](#) and [CFL 21/22-84](#).

FAMILY FIRST PREVENTION SERVICES ASSURANCES

The CDSS has released the [Assurances Template](#) (Attachment B) which counties must submit as part of the CPP. This template includes the following assurances:

- Title IV-E Prevention Program Reporting
- Child Safety Monitoring (including periodic risk assessments¹).
- Workforce Development and Training
- Trauma-Informed Service Delivery
- Model Fidelity for Evidence-Based Programs
- Continuous Quality Improvement
- Equitable and Culturally Responsive Services and Supports
- Coordination with Local Mental Health

The Assurances Template is a required component of the CPP that must be signed by official(s) with signatory authority and submitted with the CPP to the CDSS. The assurances demonstrate the agencies' agreement to comply with the requirements of the FFPS program

The [Assurances Template](#) (Attachment B) must be re-submitted with any changes to the CPP. The assurances will remain in effect until changed by submission of an updated Assurances Template.

COMPREHENSIVE PREVENTION PLAN APPROVAL PROCESS

An approvable CPP must include a clear description of the required components as described in [ACL 22-23](#), as well as, a signed [Assurances Template](#) (Attachment B) as described above. The CDSS aims to provide CPP approvals as expediently as possible

¹ The [Comprehensive Prevention Plan Learning Series](#), which includes additional details regarding the state's ongoing efforts for fulfilling these requirements, is available via The [California Training Institute](#) website.

given the length and complexity of the CPP. Upon approval that the CPP meets all requirements, the reviewing CDSS analyst will send an approval letter via email to the county's prevention contact (submitted in the CPP) informing them of the approval. If the CPP is missing information, the reviewing analyst will send an email to the county's prevention contact informing them of what is missing and provide the next steps for CPP Support.

The CPP Support is available to all county Title IV-E agencies to support CPP development. Counties can request support via the [CPP Support Request Form](#).

FAMILY FIRST PREVENTION SERVICES PROGRAM OPT OUT

Support is available to Title IV-E agencies who participate in the FFPS program however, a county may later determine they are unable to fulfill the requirements of the CPP and may subsequently choose to opt out.

Counties must promptly notify the CDSS of the intention to opt out of the FFPS program. Opt out elections must be submitted to the CDSS with the submission of the Opt Out Letter as described below.

1. Opt Out Letter
 - **Attachment A** – Template attached to this ACL (with signatures from Child Welfare, Probation and Behavioral Health)
 - Summary of the prevention activities that occurred within the opt in period
2. Submit to the CDSS Prevention Inbox at ffpsapreventionservices@dss.ca.gov.

Once the opt out letter has been accepted by CDSS, the county will no longer be eligible for claiming of Title IV-E prevention services or the county's SBG allocation. Counties may only claim FFPS related funds for activities that occurred prior to the submission date of the Opt Out Letter.

The CDSS is committed to supporting the successful planning and implementation of comprehensive prevention services. If you have any questions or need additional guidance regarding the information in this letter or contact us at ffpsapreventionservices@dss.ca.gov.

Sincerely,

Original Document Signed By

ANGIE SCHWARTZ
Deputy Director
Children and Family Services Division

Attachments

ATTACHMENT A- FAMILY FIRST PREVENTION SERVICES Program OPT OUT LETTER

California Department of Social Services
Attention: Family Centered Safety and Support Bureau
744 P Street, MS 8-11-87
Sacramento, CA 95814

Director Kim Johnson:

RE: COUNTY OPT OUT OF THE FAMILY FIRST PREVENTION SERVICES PROGRAM

The purpose of this letter is to inform the California Department of Social Services (CDSS) that as of _____(date), _____ County elects to opt out of the FFPS Program established by Welfare and Institutions Code [\(WIC\) Sections 16585 through 16589.](#)

With the submission of this Opt-Out Letter, _____County represented by the undersigned, acknowledges that:

- The County will not be submitting the Comprehensive Prevention Plan (CPP) or continuing participation in the FFPS program.
- The County will no longer be eligible to claim Title IV-E prevention funds or to the SBG allocation for activities and expenditures occurring after the opt-out date.
- The county's SBG allocation will be reallocated to other participating counties.
- All activities conducted while the county opted into the FFPS program complied with requirements of the FFPS program, including but not limited to, the requirements set forth in WIC § 16585 through 16589, Section 471(e) of Title IV-E of the Social Security Act, all assurances submitted by the county, and the allowable uses of available prevention funding streams.
- The county has collaborated with local tribes, as required.

Signature of Authorized CWS Representative

Date

Signature of Authorized Probation Representative

Date

Signature of Authorized Behavioral Health Representative

Date

ATTACHMENT A- Continued

Please provide the following information:

Why is the county electing to opt out of the FFPS program?

(Provide Answer Below. Ex: Staffing, allocation, and population concerns)

ATTACHMENT B- ASSURANCES TEMPLATE

FAMILY FIRST PREVENTION SERVICES PROGRAM ASSURANCES

County of _____

Instructions: These assurances must be submitted by local child welfare services (CWS) and probation agencies that opt into the FFPS Program and are a required component of the local comprehensive prevention plan (CPP). These assurances will remain in effect unless changed by the submission of updated assurances and an updated CPP. Any changes to the local CPP must include resubmission of these assurances.

Title IV-E Prevention Program Reporting

In accordance with section 471(e)(5)(B)(x) of the federal Social Security Act and California WIC Section 16587(d)(9), _____, (Name(s) of participating child welfare services and/or probation agency) is providing this assurance, consistent with the local CPP and the California Title IV-E Prevention Services State Plan, to collect and report to the CDSS information and data required for the FFPS Program, including all information and data necessary for federal financial participation, federal reporting, to determine program outcomes, and to evaluate the services provided. This includes, but is not limited to, child-specific information and expenditure data.

Child Safety Monitoring

In accordance with section 471(e)(5)(B)(ii) of the federal Social Security Act and California WIC sections 16587(d)(7)-(8), the _____ (Name(s) of participating CWS and/or probation agency) assures it will provide oversight and monitoring of the safety of children who receive services under the FFPS Program, including oversight and monitoring of periodic risk assessments throughout the period of service delivery. The agency further assures it will monitor and oversee the safety of children and periodic risk assessments for children who receive FFPS program services through its contracted community-based organizations. If the local child welfare and/or probation agency determines the child's risk of entering foster care remains high despite the provision of the services, the agency assures that it will reexamine the child's prevention plan during the 12-month period. In the case of an Indian child, the agency assures the assessments, and any reexamination of the prevention plan will be conducted in partnership with the Indian child's tribe.

Workforce Development and Training

In accordance with section 471(e)(5)(B)(viii) of the federal Social Security Act, the _____ (Name(s) of participating CWS and/or probation agency) assures it will adhere to the FFPS training plan as outlined in the California Title IV-E Prevention Services State Plan, and ensure caseworkers within both the

community and Title IV-E agency pathways under the FFPS program are supported and trained in assessing what children and their families need, connecting to the families they serve, accessing and delivering the needed trauma-informed and evidence-based services, overseeing and evaluating the continuing appropriateness of the services, and all other foundational requirements, including but not limited to, understanding how the requirements of the federal Indian Child Welfare Act (ICWA) and implementing state laws intersect with prevention services provided through the community based and Title IV-E agency pathways.

Trauma-Informed Service Delivery

The _____ (Name of participating CWS and/or probation agency) assures that in accordance with section 471(e)(4)(B) of the federal Social Security Act and California WIC Section 16587(d)(6), each service in the CPP provided to or on behalf of a child will be provided under an organizational structure and treatment framework that involves understanding, recognizing, and responding to the effects of all types of trauma, including historical and multigenerational trauma, and in accordance with recognized principles of a trauma-informed approach and trauma-specific interventions to address trauma's consequences and facilitate healing.

Model Fidelity for Evidence-Based Programs and Continuous Quality Improvement

In accordance with section 471(e)(5)(B)(iii)(II) of the federal Social Security Act and California WIC Sections 16587(d)(10) and 16587(d)(11)(A), the _____ (Name of participating CWS and/or probation agency) assures that services provided in the CPP will be continuously monitored to ensure fidelity to the practice model, to determine the outcomes achieved, and to refine and improve practices based upon information learned, using a continuous quality improvement framework, developed in accordance with instructions issued by the CDSS. The agency agrees to participate in state level fidelity oversight, data collection, evaluation, and coordination to determine the effectiveness of a service provided under the FFPS program.

Equitable and Culturally Responsive Services and Supports

In accordance with the Governor's Executive Order N-16-22, and consistent with California Five Year Prevention Services State Plan, the _____ (Name of participating child welfare services and/or probation agency) assures that the implementation of interventions, services and supports should be equitable, culturally responsive and targeted to address disproportionality and disparities experienced by black, indigenous, and people of color, as well as lesbian, gay, bisexual, transgender, queer and plus children and youth.

Coordination with Local Mental Health

In accordance with section 471(e)(10)(C) of the federal Social Security Act and California WIC Section 16588(f)(3), the _____ (Name of participating CWS and/or probation agency) assures the agency will establish a joint written protocol, based on the model developed by the CDSS and Department of Health Care Services for use among the child welfare agency, probation department, behavioral health agency, and other appropriate entities to determine which program is responsible for payment, in part or whole, for a prevention service provided on behalf of an eligible child.

Signatures

Signature: These assurances must be signed by the official with authority to sign the CPP and submitted to the CDSS for approval.

Signature of Authorized CWS Representative

Date

Signature of Authorized Probation Representative

Date