

December 16, 2024

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

**ALL COUNTY LETTER NO. 24-90**

The purpose of this All County Letter (ACL) is to inform and provide guidance to child welfare and probation agencies and Tribes with California Title IV-E agreements about the Family First Prevention Services (FFPS) Program established under [Welfare and Institutions Code sections \(WIC \) Sections 16585 through 16589](#). This letter informs counties of the [State Block Grant \(SBG\) reappropriation](#). Additionally, this ACL addresses outcomes resulting from the FFPS Small County Workgroup, including the flexibility for small counties to expend SBG funds for prevention services outside of the limited federally eligible Title IV-E prevention services and the additional flexibility for small counties for local expenditures using [Family First Transition Act \(FFTA\)](#) funds. The small county exemption for FFPS SBG expenditures and FFTA expenditure flexibility only apply to the 20 small counties indicated in Attachment A. With the inclusion of these additional flexibilities in state law, this ACL provides the option and instructions for small counties that would like to reconsider opting into the FFPS Program.



JENNIFER TROIA  
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**DEPARTMENT OF SOCIAL SERVICES**  
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GAVIN NEWSOM  
GOVERNOR

December 16, 2024

ALL COUNTY LETTER NO. 24-90

TO: ALL COUNTY CHILD WELFARE DIRECTORS  
ALL CHIEF PROBATION OFFICERS  
ALL CHILD WELFARE SERVICES PROGRAM MANAGERS  
ALL COUNTY BOARDS OF SUPERVISORS  
ALL CALIFORNIA TITLE IV-E AGREEMENT TRIBES

SUBJECT: FLEXIBILITIES FOR SMALL COUNTIES OPTING INTO THE FAMILY FIRST PREVENTION SERVICES PROGRAM AND FOR EXPENDITURES BY SMALL COUNTIES USING FAMILY FIRST TRANSITION ACT FUNDS

REFERENCE: [FEDERAL BIPARTISAN BUDGET ACT OF 2018 \(PUBLIC LAW 115-123\)](#); [WELFARE & INSTITUTIONS CODE SECTIONS 16585-16589](#); [FAMILY FIRST TRANSITION ACT \(PUBLIC LAW 116-94\)](#); [ASSEMBLY BILL \(AB\) 128 \(BUDGET ACT OF 2021\)](#); [ASSEMBLY BILL NO. 107 \(BUDGET ACT OF 2024\)](#); [ALL COUNTY LETTERS \(ACL\) 21-47, ACL 21-155, ACL 22-23, ACL 23-23 AND ACL 23-41](#); [COUNTY FISCAL LETTERS \(CFL\) 20/21-92, CFL 21/22-109 AND CFL 21/22-110](#)

The purpose of this All County Letter (ACL) is to inform and provide guidance to child welfare and probation agencies and Tribes with California Title IV-E agreements about the Family First Prevention Services (FFPS) Program established under [Welfare and Institutions Code sections \(WIC\) Sections 16585 through 16589](#). This letter provides information regarding the reappropriation of the FFPS State Block Grant (SBG), the additional flexibility for small counties to use SBG funds without implementing a Title IV-E eligible prevention service, and the Family First Transition Act (FFTA) expenditure flexibility for small counties. With the addition of these flexibilities for small counties, this ACL also provides instructions for the small counties that would like to reconsider opting into the FFPS program.

## **BACKGROUND**

On February, 9, 2018, the federal government enacted the [Bipartisan Budget Act of 2018 \(Public Law 115-123\)](#), which included the Family First Prevention Services Act (FFPSA).

Part 1 of the FFPSA allows states the option to access federal Title IV-E funds for eligible Evidence Based Programs (EBPs) for mental health, substance use treatment, and in-home parent education services. The 10 EBPs eligible for Title IV-E funding in California are identified in [California's Five Year Prevention Plan](#).

In July 2021, the FFPS program was established in state law by [Assembly Bill \(AB\) 153](#), which added [WIC Sections 16585 through 16589](#). The FFPS program encompasses federal Title IV-E prevention services established under the FFPSA, and the continuum of comprehensive prevention services described in [WIC Section 16588\(c\)](#). The FFPS program in California is an opt-in program for county child welfare and probation agencies and Tribes with a California Title IV-E agreement to develop and implement a continuum of prevention services. Counties and Tribes that opted into the FFPS Program submitted a three-year Comprehensive Prevention Plan (CPP) in accordance with [ACL 22-23](#) and [ACL 23-23](#).

Counties and Tribes that opted into the FFPS program received an allocation of SBG funds, which provide additional flexibility to incorporate primary and secondary prevention strategies as part of the local continuum of comprehensive prevention services. The SBG funds may also support culturally responsive programs and other secondary and tertiary prevention services that fill service gaps but are not yet eligible for federal Title IV-E funding or not yet included in [California's Five-Year Prevention Plan](#). The funds were a one-time appropriation to be spent over three years and were set to expire June 30, 2024. However, the [State Budget Act of 2024](#) includes reappropriation authority that extends the availability of the FFPS SBG funds through June 30, 2028, given that counties and Tribes with California Title IV-E agreements are in the initial stages of their CPP implementation.

The FFTA Transition Grant was enacted by [PL 116-94](#) to assist Title IV-E agencies with FFPSA implementation. As stated in [ACL 21-47](#), [ACL 21-155](#) and [ACL 23-41](#), California received FFTA Transition Grant funding in the amount of approximately \$49.1 million from the federal government. Approximately \$5.3 million was set aside to develop statewide standards, processes, and tools that support a coordinated approach to prevention services. The remaining balance of approximately \$43.8 million was allocated to county child welfare agencies and Tribes with California Title IV-E agreements per [CFL 20/21-92](#) and [CFL 21/22-109](#).

In response to the challenges and concerns shared with the California Department of Social Services (CDSS) regarding various requirements for the FFPS program, CDSS, in partnership with the County Welfare Directors Association facilitated a workgroup comprised of small counties, prevention teams, contractors, prevention partners, and CDSS representatives. The workgroup participants identified challenges small counties face in planning and implementing new programs and proposed solutions to support participation in the FFPS Program. The solutions include the flexibility for a small county to use SBG funds without implementing a Title IV-E eligible EBP and the FFTA Transition Grant funding flexibility.

### **STATE BLOCK GRANT REAPPROPRIATION**

CDSS allocated funding from the SBG to support counties and Tribes in their efforts to establish new community-based programs, enhance existing services, and develop

innovative approaches to prevention. This strategic allocation of resources strengthens CDSS' commitment to preventing child abuse and neglect by empowering families and providing them with the necessary tools and support to thrive. The SBG funds were initially set to expire on June 30, 2024.

[The Budget Act of 2024](#) approved the reappropriation of the SBG, making these funds available through June 30, 2028. Counties and Tribes must use their allocated SBG funds in accordance with their approved CPP and the requirements and allowable activities set forth in [ACL 22-23](#), counties can reference in [CFL No. 21/22-110](#). CDSS will provide Tribes with California Title IV-E agreements separate claiming instructions in the agreement and allocation letter to each Tribe.

### **TITLE IV-E EVIDENCE BASED PROGRAM REQUIREMENT EXEMPTION FOR SMALL COUNTIES**

In accordance with [WIC Section 16588\(c\)\(3\)\(B\)](#), counties are required to use FFPS SBG funds for the nonfederal share of cost of prevention services under Title IV-E of the federal Social Security Act, allowable administrative activities performed for the program, and program implementation costs in accordance with written guidance issued by the department. In addition to using FFPS SBG funds to support Title IV-E prevention services, counties may also use these state funds to support prevention services included in their local comprehensive prevention plan, consistent with guidance issued by the department.

Small counties voiced challenges and needs for additional infrastructure and resources to implement Title IV-E eligible prevention services. To facilitate equitable participation in the FFPS program by small counties and increase opportunities for prevention services to be provided in rural communities, [WIC Section 16588\(c\)\(3\)\(C\)](#) was added to allow CDSS to exempt a small county from the requirement to use state funds allocated for the nonfederal share of cost of Title IV-E prevention services, as defined in [Subdivision \(e\) of WIC Section 16586](#). This statutory change now allows small counties that opt into the FFPS program to receive and use SBG funds without implementing a federally eligible Title IV-E prevention service.

Attachment A lists the 20 small counties that are eligible for this exemption. Small counties must document their decision not to implement a Title IV-E prevention service in their CPP. Small counties that previously selected a Title IV-E eligible EBP in their CPP but would like to use this exemption can submit an addendum updating their local CPP prior to the implementation of services. This update must be submitted to the prevention inbox at [ffpsapreventionservices@dss.ca.gov](mailto:ffpsapreventionservices@dss.ca.gov). In the addendum, the county must include the following:

1. An explanation of the challenges they are facing with implementing their selected Title IV-E eligible EBP.
2. A detailed summary of how the county attempted to mitigate those challenges.
3. If the county intends to implement a Title IV-E eligible EBP in a later phase.
4. What well-supported EBPs from the Title IV-E Prevention Services Clearinghouse that the county could possibly implement in the future.

5. Any impacts this change would have on their theory of change, logic model and/or spending plan.
6. Confirmation that the governance structure described in the CPP was utilized for the decision to remove a Title IV-E eligible EBP from the CPP.

CDSS recognizes challenges posed to small counties due to the requirement to select a Title IV-E eligible EBP for their local FFPS program, which may have impacted decisions by small counties to opt in. Small counties that have not yet opted into the FFPS program are being provided the opportunity to reconsider opting in. If a small county is interested in opting in at this time, the county must submit the Letter of Intent (LOI) by March 31, 2025, to inform the state of their intent to opt into the FFPS program. Submission of a completed LOI (Attachment B) is required for a county to inform the state of their intent to opt into the FFPS program and to begin accessing their local SBG allocation.

Small counties opting in at this time must submit their CPP by December 1, 2025, and meet all of the CPP requirements outlined in [ACL 22-23](#). If the small county is utilizing the small county exemption from the requirement to implement a Title IV-E eligible EPB, they must address the following items in their local CPP:

1. A detailed summary explaining the small county's challenges to incorporate a Title IV-E eligible EBP.
2. Whether the small county intends to implement a Title IV-E EBP in a later phase.
3. What well-supported EBPs from the Title IV-E Prevention Services Clearinghouse that the small county could possibly implement in the future.

In addition to completing the CPP, small counties are highly encouraged to meet with CDSS' FFPS Program team to discuss the opt-in process as well as the necessary steps to develop their CPP. It is also highly recommended that small counties participate in the Title IV-E subcommittee for the FFPS Advisory Committee. This standing subcommittee provides input and information to the FFPS Advisory Committee regarding implementing the FFPS program. Participation in this subcommittee will help increase understanding of the state's current progress with FFPS implementation and provide an opportunity to offer valuable input.

### **FAMILY FIRST TRANSITION ACT PREVENTION SPENDING FLEXIBILITY FOR SMALL COUNTIES**

Per [ACL 21-47](#), [CFL 20/21-92](#), and [CFL 21/22-109](#), \$43.8 million in federal FFTA Transition Grant funding, available for expenditure through September 30, 2025, was allocated to counties to support transition and implementation activities under the FFPSA. Each county received an allocation from FFTA Transition Grant funds with a minimum allocation of \$100,000. In accordance with [ACL 21-47](#), 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. These activities include all purposes allowable under Title IV-B of the Social Security Act, and any waiver demonstration project activities.

CDSS previously provided state guidance in [ACL 21-47](#) that required all counties to expend at least 50 percent of its FFTA Transition Grant funding to engage in prevention and/or early

intervention planning, to expand capacity for EBPs to support children, youth, and families, for evaluation activities directly related to the implementation of Title IV-E prevention services, or for allowable purposes under Title IV-B. Due to the challenges voiced by small counties in meeting this requirement, CDSS will allow small counties additional flexibility for expenditures by small counties for prevention and/or early intervention planning or other activities. The small counties listed in Attachment A may utilize FFTA Transition Grant funding for any of the permissible purposes described in [ACL 21-47](#), without a requirement to expend at least 50 percent of these funds on the activities listed above. CDSS encourages counties to use other state funds (i.e., Family Finding) in combination with the FFTA to address prevention and family engagement. Funds are available for expenditure through September 30, 2025. Child welfare agencies and Tribes with California Title IV-E agreements are encouraged to prioritize utilizing and spending all the FFTA funds before they expire.

### **ADDITIONAL SUPPORT**

CDSS is committed to supporting the successful planning and implementation of comprehensive prevention services. CDSS is exploring where specific flexibility is possible including the extent to which collective supports can be employed to assist with training, model fidelity and continuous quality improvement requirements.

CDSS supports agencies with technical assistance (TA), either regionally or to a single county, provided by CDSS and/or external TA partners to help with:

- Cross sector collaboration
- Community engagement
- Tribal engagement
- Problem solving
- CPP Planning and Implementation
- Funding sources for prevention

If you have any questions or need support, please reach out to the prevention inbox at [ffpsapreventionservices@dss.ca.gov](mailto:ffpsapreventionservices@dss.ca.gov).

Sincerely,

***Original Document Signed By***

ANGIE SCHWARTZ  
Deputy Director  
Children and Family Services Division

Attachment(s)

## **ATTACHMENT A**

The list below includes the 20 small counties that are eligible for the Evidence Based Program exemption and the Family First Transition Act flexibility.

1. Alpine
2. Amador
3. Calaveras
4. Colusa
5. Del Norte
6. Glenn
7. Inyo
8. Lake
9. Lassen
10. Mariposa
11. Modoc
12. Mono
13. Nevada
14. Plumas
15. San Benito
16. Sierra
17. Siskiyou
18. Tehama
19. Trinity
20. Tuolumne

**LETTER OF INTENT (ATTACHMENT B)**

\_\_\_\_\_, 2025

California Department of Social Services  
Attention: Family Centered Safety and Support Bureau  
[ffpsapreventionservices@dss.ca.gov](mailto:ffpsapreventionservices@dss.ca.gov)  
744 P Street, MS 8-11-87  
Sacramento, CA 95814

**RE: COUNTY OPT-IN TO THE FAMILY FIRST PREVENTION SERVICES PROGRAM**

The purpose of this letter is to inform the California Department of Social Services (CDSS) that \_\_\_\_\_ County intends to opt-in to and receive State Family First Prevention Services Program (FFPSP) Block Grant funds for prevention services under Part I of the Family First Prevention Services Act and [Welfare and Institutions Code Sections 16585 – 16589](#).

The county is opting-in as:

- ☐ Child Welfare Agency and Probation Department opting in together, Co-lead
- ☐ Child Welfare Agency is the lead
- ☐ Probation Department is the lead

The county Mental Health Plan (MHP) was consulted and has been informed of the agency's decision to opt-in to the FFPS Program:

- ☐ Yes
- ☐ No

The county has hired/is considering hiring a FFPS Consultant

- ☐ Yes, Name of Consultant \_\_\_\_\_
- ☐ No
- ☐ Unsure

The county's contact person on the FFPS Program:

Child Welfare \_\_\_\_\_  
Name, email and phone number

Probation \_\_\_\_\_  
Name, email and phone number



## **AGREEMENTS**

By choosing to opt into the FFPS program and as a condition of receiving FFPS program State Block Grant funds, \_\_\_\_\_ County agrees to the perform the following activities:

1. Ensure cross-sector collaboration that is inclusive of all entities described in Welfare and Institutions Code [\(WIC\) Section 16585\(b\)\(4\)](#) and [WIC Section 16587\(a\)](#).
2. Meet all applicable state and federal FFPS program and fiscal requirements for Title IV-E prevention services, including but not limited to, the requirements set forth in WIC Sections 16585 through 16589 and Section 471(e) of Title IV-E of the federal Social Security Act.
3. Develop and implement the local Comprehensive Prevention Plan (CPP), which shall include the following elements:
  - A description of the outcome of any Capacity and Readiness assessments completed by the county that inform the plan's content.
  - A description and rationale for the selection of the candidacy population(s) to be prioritized and the services to be included in the plan.
  - The theory of change or logic model which describes the activities and intended outcomes for children, youth, parents, caregivers, and families. The logic model may help connect the goals of the cross-sector collaborative to align with the intent of both the state and federal legislation.
  - A description of the county's governance structure or engagement strategies to ensure that required cross sector collaboration was utilized in decision making for the CPP.
  - A description of efforts to invite and engage Indian Tribes in cross sector collaboration and input into the CPP.
  - Assurance and plans for meeting the workforce and training requirements established under the state's five-year Title IV-E Prevention Plan. County Title IV-E agencies will follow the statewide curriculum to ensure that caseworkers within both the community and child welfare pathway are trained on all foundational requirements including the understanding of how the Tribal pathway intersects with community based and child welfare pathway services.
  - A description of how agencies will ensure that required cross sector collaboration is engaged in ongoing monitoring of the FFPS Program and how their input for will be incorporated into strategies for continuous improvement of the local FFPS Program.
  - A description of how the county will ensure that all Evidence Based Programs (EBPs), whether delivered by a contracted service provider or by county Title IV-E agency staff, will adhere to model fidelity protocols, and an assurance that the county Title IV-E Agency will participate in state level fidelity coordination and conduct a rigorous evaluation of the EBP if required.
  - Assurance that the agency will monitor child safety, including conducting periodic risk assessments. County Title IV-E agencies that contract with community-based organizations for services will also describe the process for how safety monitoring and periodic risk assessments will be overseen. Agencies must include language within service contracts that describes this process to ensure that roles and responsibilities are clear.

- Strategies for use of the [Integrated Core Practice Model](#) (e.g., candidacy assessment, family engagement, service delivery and transitioning).
  - Inclusion of the county Title IV-E agency's spending plan which describes how the State FFPS Program Block Grant will be used for prevention activities and services and the extent to which additional funds are leveraged for comprehensive planning.
  - A description of the coordination with the local Mental Health Plan to ensure adherence to federal requirements that Title IV-E remains the payer of last resort.
  - A description of the county's plans to ensure the sustainability of services in the CPP and/or the barriers and needs to ensure that sustainability.
  - Assurances of all other requirements under the state Title IV-E Prevention Program Plan approved by the federal Administration for Children and Families.
  - For small counties requesting an EBP waiver, the CPP must also include the following:
    - A detailed summary explaining the small county's challenges to incorporate an EBP.
    - If the small county intends to implement a Title IV-E EBP in a later phase.
    - What are some well-supported EBPs from the clearinghouse that the small county could possibly implement in the future?
4. Complete required asset mapping and needs assessments via cross sector collaboration.
  5. Contribute a portion of the state's Maintenance of Effort as negotiated with CDSS.
  6. Create and begin to implement a CPP due to CDSS no later than December 1, 2025.

\_\_\_\_\_ County further agrees that the funds will be used consistent with guidelines set forth in All County Letter XX- XX, including, but not limited to all written guidance by CDSS.

\_\_\_\_\_  
Signature of Authorized CWS Representative

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Authorized Probation Representative

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Authorized Behavior Health Representative

\_\_\_\_\_  
Date