

August 4, 2025

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 25-57

The purpose of this All County Letter (ACL) is to inform child welfare and probation departments of the requirements for documenting and reporting information regarding the Qualified Individual (QI) referral, QI assessment date and recommendations, Court hearing date and recommendations, and resulting placements pursuant to [ACL 21-113](#) and [CFL 21/22-51](#).



JENNIFER TROIA
DIRECTOR

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

August 4, 2025

ALL COUNTY LETTER NO. 25-57

TO: ALL COUNTY WELFARE DIRECTORS
ALL CHIEF PROBATION OFFICERS
ALL TRIBES WITH A CALIFORNIA TITLE IV-E AGREEMENT
COUNTY WELFARE DIRECTORS' ASSOCIATION OF CALIFORNIA
CHIEF PROBATION OFFICERS OF CALIFORNIA

SUBJECT: COUNTY PLACING AGENCY DATA COLLECTION FOR
CALIFORNIA QUALIFIED INDIVIDUAL (QI) REQUIREMENTS

REFERENCE: [FEDERAL BIPARTISAN BUDGET ACT OF 2018 \(PUBLIC LAW 115-123\)](#); [SOCIAL SECURITY ACT 42 U.S.C. SECTION 675a](#); [ASSEMBLY BILL 153 \(CHAPTER 86, STATUTES OF 2021\)](#); [ALL COUNTY LETTER \(ACL\) 21-113/BEHAVIORAL HEALTH INFORMATION NOTICE 21-060](#); [ACL 21-114](#); [ACL 21-115](#); [ACL 21-116](#); [ACL 21-139](#); [ALL COUNTY INFORMATION NOTICE I-84-21](#); [COUNTY FISCAL LETTER \(CFL\) 21/22-34](#); [CFL 21/22-51](#)

PURPOSE

The purpose of this All County Letter (ACL) is to inform child welfare and probation departments of the requirements for documenting and reporting information regarding the Qualified Individual (QI) referral, QI assessment date and recommendations, Court hearing date and recommendations, and resulting placements pursuant to [ACL 21-113](#) and [County Fiscal Letter \(CFL\) 21/22-51](#).

BACKGROUND

The [Family First Prevention Services Act \(FFPSA\) Part IV](#) amends the Title IV-E Foster Care program to limit the circumstances under which federal financial participation (FFP) may be used to support the foster care placement of an otherwise federally eligible child in certain types of childcare institutions. To comply with FFPSA, California enacted [Assembly Bill 153](#) to implement any limitations not already imposed by state law. With regard to placements into Short-Term Residential Therapeutic Programs (STRTP) or Community Treatment Facilities (CTF), these limitations include requirements regarding program accreditation, case plans and documentation and judicial determinations pursuant to [ACL 21-114](#), nursing availability pursuant to [ACL 21-115](#), QI assessments pursuant to [ACL 21-113](#), and aftercare services pursuant to [ACL 21-116](#).

Requirements for documenting and reporting information regarding the QI referral, QI assessment date and recommendations, court hearing date and recommendations, and resulting placements have been in place since January 2022, pursuant to [CFL 21/22-51](#).

DATA COLLECTION PROCESS

The California Department of Social Services (CDSS) developed the [Placing Agency QI Data Reporting Portal](#) (Portal) to collect certain data elements¹ needed to measure timeliness of required QI activities and provide support and technical assistance, as needed, for continuous quality improvement. Once the functionality of this portal is available through the Child Welfare Services California Automated Response and Engagement System, county placing agencies will no longer need to complete this data reporting process using the Portal. County placing agencies will be granted access to the password-protected folder for their county, through which the placing agency must input the required data for each youth referred for a QI assessment. Within 60 days from the date of this ACL, county placing agencies must:

- Email FFPSA@dss.ca.gov, with “Data Collection” in the subject line, with the names and the email addresses of the county placing agency staff who will input the information to the Portal.

Once CDSS receives this information, the agency staff will be contacted with a confirmation email, webinar date and registration link. The webinar providing training on how to use the Portal is scheduled for September 18, 2025, from 2:00 PM to 3:00 PM. Webinar information will also be posted on the University of California Davis’s [Resource Center for Family-Focused Practice QI webpage](#).

Beginning October 1, 2025, county placing agencies must input the required data on a monthly basis into the Portal for each youth referred for a QI assessment during that month and ensure all data fields listed above are completed as each QI and court activity is conducted. County placing agencies must make a new entry for each QI referral. For example, if a youth moves from one STRTP placement to a different STRTP placement, the county placing agency must input an entry for each placement, as a QI referral is requirement for each STRTP placement. The CDSS will use this information to provide technical assistance, in partnership with the Department of Health Care Services, to county placing agencies and county mental health plans, as appropriate, to support counties in meeting the FFPSA Part IV QI timeline requirements and documentation for which FFP may be used to support foster children in STRTP or CTF placements, pursuant to [ACL 21-113/BHIN 21-060](#) and [ACIN I-84-21](#). Claiming instructions for QI assessment administrative

¹ Data to be collected will include the following elements: 1) **QI Referral data**; date sent, last CFT meeting prior to referral, placement date into STRTP; 2) **QI Assessment data**; date referral received by Behavioral Health Plan (BHP), date assessment completed, date assessment received from QI; 3) **QI determination for Family Based setting data**; 4) **QI determination for other settings data**; Assessment determination needs can’t be met in Family Based setting; 5) **STRTP Court Hearing Review data** (Hearing within 45 days of placement but no later than 60 days after placement); date of hearing, court determination either approve or disapprove, approve STRTP after Family Based setting determination by QI; 6) **If STRTP disapproved by Court or QI the date the child was removed from the STRTP**.

activities and reporting to CDSS and DHCS all the information requested regarding the QI referral, assessment, and resulting placement and services were discussed in [CFL 21/22-51](#). The claiming instructions for the impact on assistance claims were discussed in [CFL 21/22-34](#).

FAMILY FIRST PREVENTION SERVICES ACT TIMELINE REQUIREMENTS FOR THE QUALIFIED INDIVIDUAL REFERRAL, ASSESSMENT DATE, AND RECOMMENDATION AND STRTP COURT HEARING REVIEW DATE AND RECOMMENDATION

The information below is taken directly from previously issued guidance from the CDSS. See [CFL 21/22-34](#), [ACIN I-84-21](#) and [ACL 21-139](#).

**When a Qualified Individual Assessment Is Not Conducted Timely
(No Title IV-E Funding is Available for the Placement)**

As outlined in Federal and State law and pursuant to the CDSS guidance [CFL 21/22-34](#), [ACIN I-84-21](#) and [ACL 21-139](#), if the QI assessment is not completed within 30 days after a placement is made, the county placing agency cannot claim any FFP for the foster care maintenance payment made on behalf of an otherwise federally-eligible youth for the entirety of the placement, including the first 14 days for a non-accredited-STRTP, even when the facility meets all other Qualified Residential Treatment Program (QRTP) requirements.

If the QI Determines That a Placement is Not Appropriate Up to 60 Days of Title IV-E Funding is Available. Depending on When the QI Assessment was Complete and When the Determination was Made

As outlined in Federal and State law and pursuant to the CDSS guidance [CFL 21/22-34](#), [ACIN I-84-21](#) and [ACL 21-139](#), if the QI determines that a placement in an STRTP is not appropriate, or if the youth is going to return home or be placed with a relative, legal guardian, an adoptive parent, in a resource family home, or an Indian Custodian or Tribal Approved Home in the case of an Indian Child, a county placing agency may utilize FFP for foster care maintenance payments on behalf of an otherwise federally-eligible youth while the youth remains in the STRTP, but only through the period necessary for transition of the youth. However, FFP is not available after the end of the 30-day period from the date the QI determines the placement is no longer recommended or approved.

In limited circumstances, up to 60 days of Title IV-E funding may be available. For example, if on the 30th day, from the start of placement, the QI made the decision that the placement is not appropriate, up to another 30 days is provided for the time needed to transition the youth into an alternative family-based placement. 30 days after the date of the QI's determination, Title IV-E funding is no longer available for STRTP or CTF placement.

If the Court Does Not Make a Timely Decision (60 Days of Title IV-E Funding is Available)

As outlined in Federal and State law and pursuant to the CDSS guidance [CFL 21/22-34](#), [ACIN I-84-21](#) and [ACL 21-139](#), if the court does not approve the placement timely, i.e., within 60 days from the date of placement and assuming the QI assessment is completed

timely, the Title IV-E agency may only claim Title IV-E foster care maintenance payments for the first 60 days of the placement of the otherwise federally-eligible youth in the STRTP.

If the Court Disapproves of a Placement (Up to 90 Days of Title IV-E Funding is Available, Depending on the Date of the Disapproval)

As outlined in Federal and State law and pursuant to the CDSS guidance [CFL 21/22-34](#), [ACIN I-84-21](#) and [ACL 21-139](#), if the court disapproves of a placement, or if the youth is going to return home or be placed with a relative, legal guardian, an adoptive parent, in a resource family home, or an Indian Custodian or Tribal Approved Home in the case of an Indian Child, a county placing agency may utilize FFP for foster care maintenance payments on behalf of an otherwise federally-eligible youth while the youth remains in the STRTP only through the period necessary to transition the youth. At no time is FFP available after the end of the 30-day period from the date it is determined that a placement is no longer recommended or approved.

Title IV-E funding may be available for up to 90 days, depending on the timing of the court's orders disapproving of the placement and the time it takes to transition the youth. For example, if on the 60th day from the start of placement, the court disapproves the placement, up to an additional 30 days are provided for the time needed to transition the youth (provided QI requirements are met). After 30 days have passed from the date of the court's disapproval, Title IV-E funding is no longer available for the placement.

If you have any questions or need additional guidance regarding the information in this letter, contact the CDSS Family First Prevention Services Act inbox at FFPSA@dss.ca.gov.

Sincerely,

Original Document Signed By

ANGIE SCHWARTZ
Deputy Director
Children and Family Services Division

cc: All County Mental Health Directors
All Foster Care Managers
All Federally Recognized Tribes
County Behavioral Health Directors Association of California
California Council of Community Behavioral Health Agencies
California Alliance of Child And Family Services