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September 2, 2015

COUNTY FISCAL LETTER (CFL) NO. 15/16-10

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY FISCAL OFFICERS
ALL COUNTY CHIEF PROBATION OFFICERS

SUBJECT: QUESTIONS AND ANSWERS REGARDING THE TITLE IV-E CALIFORNIA WELL-BEING PROJECT

REFERENCE: CFL NO. 15/16-02, DATED AUGUST 28, 2015;
CFL NO. 14/15-29, DATED OCTOBER 29, 2014;
CFL NO.14/15-36, DATED MARCH 20, 2015;
CFL NO. 14/15-30, DATED OCTOBER 24, 2014;
PROJECT TERMS AND CONDITIONS, SECTION 4.2.2.3

The purpose of this CFL is to address questions received from counties participating in the Title IV-E California Well-Being Project (herein referred to as the “Project”). Questions were submitted by participating counties through a series of conference calls, emails and preliminary county monitoring visits. The enclosed attachment provides further instructions and clarification as requested by participating counties.

Questions regarding the Project or this CFL should be directed to the Children and Family Services Division within the Department of Social Services at IV-EWaiver@dss.ca.gov.

Sincerely,

Original Document Signed By:

LILIA A. YOUNG, Chief
Fiscal Forecasting and Policy Branch

Attachment

Title IV-E California Well-Being Project Questions and Answers

Question 1: What would be the ramifications if counties continue to overspend their capped allocation through fiscal years due to higher than expected non-federal placements?

Answer: The capped allocation is based on federal expenditures; therefore, any increase in non-federal placements would not affect the federal base. Should a county spend over their federal allocation, it will be the county's responsibility to cover the additional expenditures. The amount of the capped allocation will not increase unless renegotiated with the federal Administration for Children and Families. Please refer to the Project Terms and Conditions as amended for more information.

Question 2: For counties using a contracted Wraparound model, where should case management costs be included on the Quarterly Fiscal Supplemental Form (QFSF)?

Answer: The case management expenditures for any Wraparound model, including a contracted Wraparound model, should be included in the Wraparound section of the QFSF. Previously, the instructions included these case management expenditures in the top case management section of the QFSF, not tied to the Wraparound intervention. However, this has been changed based on feedback from counties and the ability to capture these case management costs separately. Please refer to CFL No. 15/16-02, and the workbook itself for updated claiming instructions.

Question 3: How do counties claim Wraparound services under the Project?

Answer: Existing Wraparound services should be claimed as assistance on the CA 800 Assistance Claim. Wraparound services for new populations served as a result of the Project should be claimed to Program Code (PC) 165 (Wraparound Services).

Question 4: Where should counties enter the total assistance expenditures for County Probation on the QFSF?

Answer: The total assistance amount should be included in the assistance columns of the "Total Assistance/Administration" line on the "Summary" tab of the QFSF for the corresponding three month period. If counties continue to use the existing Wraparound model those costs should also be on the "CA 800 Costs" line on the corresponding fiscal year tab.

Question 5: What is the difference between statutory sharing ratios and Project sharing ratios?

Answer: Statutory sharing ratios are those developed in accordance with state and federal statute. Project sharing ratios display and track the statutory sharing ratios differently as a result of the Project Terms and Conditions waiving certain federal statutes under the Project. In the County Expense Claim (CEC), the ratios will be displayed as statutory sharing ratios. Counties will receive separate Project ledger reports showing the Project sharing ratios of 50 percent federal funds and 50 percent non-federal funds. New mandated activities post 2011 Realignment will be General Fund up to the allocation amount for those mandated activities.

Question 6: How are expenditures tracked against each county's Title IV-E capped allocation?

Answer: All expenditures for Child Welfare and County Probation are tracked against one allocation amount for each county. This is consistent with how funds are normally paid. It is the responsibility of each county to reconcile between departments using the methodology as required under the Memorandum of Understanding between Child Welfare and County Probation.

Question 7: If counties generate savings, how can those savings be used? How are savings claimed?

Answer: Per the Project Terms and Conditions, and consistent with the intent of the Project, savings shall be reinvested into the counties' Child Welfare Services Program and expenditures paid with those savings shall be claimed using the existing claiming process.

Question 8: What is the Maintenance of Effort (MOE) under the Project?

Answer: The conventional MOE concept does not apply in this setting. However, counties participating in the Project are required to provide the federal match for expenditures. Additionally, per Project Terms and Conditions, Section 2.2(l), counties are to ensure that any "savings" resulting from the demonstration, whether they are savings to the federal government, to the state, or to a county or to another jurisdiction within the state, will be used for the further provision of child welfare services. For the purposes of this provision, "savings" means any amount that would have been expended for conventional title IV-E purposes in the absence of this demonstration, or that could have been expended under title IV-B of the Act.

Question 9: Do County Probation staff need to time study?

Answer: Counties are to maintain their current time study processes under the Project.

Question 10: Does the true-up of advances (which are lower than the Project amounts) happen via the audited AA190, four months following the quarter close?

Answer: The true-up process is monthly for the Foster Care Assistance and quarterly for the County Expense Claim. This true-up process is approximately two and four months after the claim period, respectively. This is the same advance and true-up process for non-waiver programs and reported on the AA190 Statement of Cash Advance form.

Question 11: Once County Probation Departments have resolved all retroactive issues related to candidacy claiming from last year, will counties begin receiving funds for the non-Waiver PCs in the same manner as in the past (i.e. via advances with an accompanying AA190 indicating what the payments are for)?

Answer: Yes, the AA190 reflects the advance amounts, the actual expenditures and the true-up for Waiver and non-Waiver payments. Please refer to [CFL No. 14/15-30] for County Probation reimbursement claiming instructions.

Question 12: On the Project PC list it states "the portion of PC 164 (CWS – Services/Nonfederal) that should be captured excludes federal Title IV-B, the match and any staff development costs." How is this calculated and how do counties avoid counting staff development and double counting other expenditures in PCs 596 (SUO- CWS IV-B Non-Fed), 198 (SUO- EA CWS Non-Fed) and 734 (SUO- CWS Case Management)?

Answer: Below are the steps to calculate the appropriate portions to include on the QFSF:

- Step One: Determine the Title IV-B match (25 percent) for PCs 164 and 596.
- Step Two: Add together the non-federal and county share of PCs 164 and 596 (for the county program only, excluding staff development after exhausting the allocation).
- Step Three: Take the amount from Step Two and subtract the amount from Step One.
- The Waiver Ledgers and Manual Ledgers, prepared by the Financial Services Bureau IV-E Waiver Section, reflect the methodology used for shifting the cost for PCs 596, 198 and 734 to the Project. These ledgers will be sent to the counties quarterly on the month that the CEC quarter expenditures true-up is completed.