



Family First Prevention Services Act 2018

**Informational Webinars
October 5 & 9, 2018**



AGENDA



Overview

- ☐ Welcome
- ☐ Review of Key Provisions & Federal Timelines
- ☐ Q & A
- ☐ Next Steps



Purpose



“...To enable states to use Federal Funds available under Parts B and E of Title IV of the Social Security Act to provide enhanced support to children and families and prevent foster care placements through the provision of mental health, substance abuse prevention and treatment services, in-home parent skill building, and kinship navigator services.”

FFPSA



Key Sections



Part I: Foster Care Prevention and Services

Programs *Allows states to use Title IVE funds to prevent placement to include in-home parent skills, substance abuse, and mental health services; establishes EBP framework for funding prevention services & continues kinship navigator programs*

Part II: Enhanced Support Under Title IVB *Improves interstate placement & continues support for Regional Partnership Grants**

Part III: Miscellaneous *Provides Model Licensing Standards for foster family homes*

* Regional Partnership Grants fund partnerships between child welfare and substance abuse treatment programs



Key Sections



Part IV: Ensuring the Necessity of a Placement That is Not a Foster Family *Establishes Qualified Residential Treatment Programs, and use of Title IV-E dollars for residential programs providing parents supports, independent living, services to youth who are trafficked or at risk of trafficking.*

Part V: Continuing Support for Child and Family Services *\$8m for one time competitive grants for foster parent recruitment and retention, extending the Promoting Safe and Stable Families Program, allows states to extend coverage provided under the Chafee Foster Care Independence Program*



Key Sections



Part VI: Continuing Incentive to States to Promote Adoption and Legal Guardianship

Reauthorizes Incentive Programs

Part VII: Technical Corrections

Part VIII: Ensuring States Re-Invest Savings Resulting From Increased Adoption Assistance

Delays effective date for elimination of final phase of the delink from AFDC/defining who is an “applicable child”



Provisions Effective 1/1/18 & 2/9/18



Adoption Assistance

Delay of phase-in of Adoption Assistance applicable child requirements from January 1, 2018 to June 30, 2024.

- This requires states to continue to “look-back” to 1996 AFDC eligibility requirements for Title IV E for children 0-2 y/o to determine their eligibility for Adoption Assistance.

Provision implemented.



Provisions Effective 1/1/18 & 2/9/18



Proof of Foster Care

Prior to aging out, those youth in care more than 6 months must receive official documentation necessary to prove their prior status as a foster child to secure benefits such as Mass Health.

Provision implemented.



Provisions Effective October 1, 2018



Residential Family Based Substance Abuse Treatment

- ❑ Agencies may claim Title IVE maintenance (care) payments & related admin costs for children placed w/a parent in a licensed residential family based substance abuse treatment program for up to 12 months
- ❑ This may not be a child care institution (CCI) and is not required to meet CCI licensing standards
- ❑ Children must meet Title IVE eligibility requirements (be in placement & under the care of the Department)
- ❑ This does not include the cost associated with the parent's treatment or care.

Discussions initiated with Department of Public Health



Provisions Effective October 1, 2018*



Criminal Record and Child Abuse Registry Checks

- ❑ Extends requirements for CORI, SORI, Fingerprint bases national criminal information requests to all* adults working in a CCI
- ❑ Requires documentation in the CCI's licensing file that checks have been conducted

*DCF has applied for delayed implementation of this provision to April 2020.**

*EEC currently requires these checks for staff who work directly with children/youth.

*CB has informed states that they may implement delays at any time on or before the approved date.



Provisions Effective April 1, 2019

Model Licensing Standards for Family Foster Homes

- ❑ Requires states to affirm compliance with new model licensing standards.
- ❑ Requires states to document waivers for non-safety licensing standards for relatives foster homes.
- ❑ Requires states to address training for workers re: standard waivers.

DCF has submitted comments on draft Model Licensing Standards. Existing EEC/DCF standards and policies are well within the new requirements.



Provisions Effective October 1, 2019

Certification Preventing Increases to the JJ Populations

- ❑ States must certify that they will not enact policies that significantly increase the JJ population as a result of FFPSA

Given ongoing DYS partnership initiatives , DCF anticipates that it will be in compliance with this requirement.

Limitations on Title IVE Maintenance Payments for Non-Family Foster Care

- ❑ Establishes that states may claim 14 days of care for such placements prior to documentation of compliance with related FFSPA requirements except for high quality programs serving youth who are, or at risk of sex trafficking, & youth living in supervised independent living.



Provisions Effective October 1, 2019

Definition of Foster Family Home

- ❑ Provides for licensure and approval of homes
- ❑ Reinforces prudent parent standard
- ❑ Sets a max of 6 children in foster care in each home and provides for exceptions (i.e. parenting teens, meaningful relationships, specialized skills.)

No anticipated difficulty with these requirements



Provisions Effective October 1, 2019

Qualified Residential Treatment Programs

- ❑ Requires 30-day assessment by a qualified individual using an evidence-based, age appropriate, validated, functional assessment tool. (one not employed by or affiliated with the CCI)*
- ❑ 60 day court review to review and approve the placement based on the assessment and documentation of the qualified individual.
- ❑ Allows 30 days from determination to remove the child to another setting.

*** States may request a waiver of this requirement with a guarantee of objectivity.**



Provisions Effective October 1, 2019

Qualified Residential Treatment Programs

- ❑ Requires documentation of continued need for placements longer than 12 consecutive (18 nonconsecutive) months.
- ❑ Requires accreditation (i.e. COA, Joint Commission, CARF)



Provisions Effective October 1, 2027

Electronic Interstate Case Processing System

- ❑ All states must have a centralized interstate case processing system

Implementation of the provision is underway.



Foster Care Prevention Provisions



Time Limited Foster Care Prevention Services

- ❑ Optional funding for time limited (one year) prevention services for candidates for foster care* for mental health, substance abuse, and in-home parent skills based programs
- ❑ Requires that services are trauma informed and
 - Manualized
 - Show no empirical risk of harm
 - Where weight of evidence supports a benefit
 - Has valid and reliable outcomes
 - For which there is not case data for severe or frequent risk of harm.

* Candidates do not need to meet eligibility requirements for Title IV-E



Foster Care Prevention Provisions

Time Limited Foster Care Prevention Services

- Promising Practices
- Supported Practices
- Well Supported Practices
- Requires that states collect and report individual child outcomes
- Requires an evaluation strategy
- Requires maintenance of effort (maintaining the same level of state funding for foster care prevention services.
- HHS to issue guidance on practice criteria by October 1, 2018, provide technical assistance, establish and evidence based clearinghouse, and conduct data collection and evaluation.



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Additional Provisions

Chaffee Independent Living

- ❑ Allows states to extend support through age 23
- ❑ Allows states to extend ETV support through age 26 (w/ max of 5 years and \$5,000).

Evidence Based Kinship Navigator Programs

Continues Adoption & Guardianship Incentive Program

Provides a One Time Grant Program for Foster Family Recruitment and Retention



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Regional Partnership Grants

- ☐ Calls for partnerships between public health and child welfare
- ☐ Requires planning and implementation phases
- ☐ Reduces available funds.

Health Care Oversight

- ☐ Coordination with Mass Health
- ☐ Ensuring that children in foster care are not inappropriately diagnosed w/ mental illness, emotional or behavioral disorders.



Implementation Considerations

- ❑ Q RTPs and related requirements must be implemented before states can draw down Foster Care Prevention dollars.
- ❑ Implementation may be delayed up to 2 years for provisions that are effective October 1, 2019 but there is flexibility to adjust projected dates.
- ❑ States w/existing Title IVE waivers may seek a 1 year waiver.
- ❑ Evidence based practices repository, TA processes, and related protocols have not yet been established,
- ❑ Major provisions will likely require new procurements to bring contracts into alignment in preparation for implementation.



Next Steps

- ❑ An inclusive process with all of our stakeholders to include briefings, listening sessions, etc.
- ❑ Activities underway include:
 - Submission of materials to meet technical, waiver and related Title IV-E state plan requirements
 - Initial analysis of fiscal impact underway
 - Working w/ DPH to assess opportunities for internal assessment and planning re: Family Based Residential Substance Abuse Treatment
 - Congregate care readiness assessment
 - Work plan development related to procurement planning



Your Questions