

March 10, 2022

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 22-23

The purpose of this All-County Letter (ACL) is to inform counties of the requirements to opt-into the Family First Prevention Services (FFPS) Program, which includes Title IV-E prevention services established by Part I of the federal Family First Prevention Services Act as part of the continuum of comprehensive prevention services described in Welfare and Institutions Code § 16588(c). The funding sources described in the letter include the State FFPS Program Block Grant, as referenced in Welfare and Institutions Code § 16588, and the federal financial participation under Title IV-E of the Social Security Act that will be available for allowable activities upon federal approval of the state Title IV-E Prevention Services Plan. This letter will describe the intended purpose of each funding source, provide a list of allowable activities, and explain the opt-in process, deadlines and associated requirements. Further, this ACL provides the FFPS Program templates for the Letter of Intent, descriptions of the Capacity and Readiness Assessment Domains, and corresponding due dates for counties electing to participate in the FFPS Program. The letter also includes the list of requirements and approval process for the Comprehensive Prevention Plan that opt-in counties must develop and submit to the California Department of Social Services by January 31, 2023.



KIM JOHNSON
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



GAVIN NEWSOM
GOVERNOR

March 10, 2022

ALL COUNTY LETTER NO. 22-23

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 OPT-IN
PROCESS, STATE FFPS PROGRAM BLOCK GRANT
ALLOCATION METHODOLOGY AND ALLOWABLE ACTIVITIES**

REFERENCE: [FEDERAL BIPARTISAN BUDGET ACT OF 2018 \(PUBLIC LAW 115-123\)](#); [42 UNITED STATES CODE SECTION 671\(e\)](#); [WELFARE AND INSTITUTIONS CODE \(WIC\) SECTIONS 16585 through 16589](#); [STATE BUDGET ACT 2021 \(ASSEMBLY BILL \[AB\] 128\)](#); [AB 2083](#); [ALL COUNTY INFORMATION NOTICE \(ACIN\) NO. I-73-21](#)

The purpose of this All County Letter (ACL) is to inform county child welfare agencies and probation departments (local Title IV-E Agencies) of the opt-in process for the Family First Prevention Services (FFPS) Program which encompasses Title IV-E prevention services established under Part I of the [Family First Prevention Services Act](#) (FFPSA) and the continuum of comprehensive prevention services described in [WIC §16588\(c\)](#). This letter provides guidance and information on the available state and federal funding to support the planning and implementation of Title IV-E and comprehensive prevention services provided under the FFPS Program established by [WIC §16585 through 16589](#).

The two funding sources described in this letter include the State FFPS Program Block Grant (State Block Grant) and federal Title IV-E funds for prevention services under Part I of the FFPSA ([Public Law 115-123](#)). This letter will specify the opt-in process and associated requirements, describe each funding source, provide a list of allowable activities, and explain additional information about the State FFPS Program.

The California Department of Social Services (CDSS) will continue to consult with Indian Tribes who have entered into an agreement with the state pursuant to WIC section 10553.1 on the opt-in procedures, allocations and reporting requirements to provide prevention services eligible for Title IV-E reimbursement. Following tribal consultation, the CDSS will release additional guidance regarding opt-in procedures, allocations and requirements for Indian Tribes that have a state Title IV-E agreement.

Background

The federal FFPSA was enacted under [Public Law 115-123](#) in 2018. Amongst its many provisions, it created a prevention services program that allows states the option to access Title IV-E federal financial participation for the provision of specified evidence-based mental health, substance use, and in-home parent skill-based services to children at imminent risk of entry into foster care, their parents or kin caregivers, and pregnant or parenting youth in foster care.¹ This includes kin caregivers of children who are not under the placement and care of a Title IV-E agency and are qualified for prevention services. The intent of this legislation is to increase the availability and early access to quality prevention services for children, parents, and kin caregivers to help children remain at home while simultaneously reducing the use of foster care placements.

In July of 2021, California's FFPS program was established in [WIC §16585 through 16589](#) as an opt-in program for county and tribal Title IV-E agencies to develop and implement Title IV-E prevention services as part of comprehensive prevention, early intervention services and to address child well-being. The CDSS acknowledges that counties are at various stages of development of their Children's System of Care (AB 2083) Memorandum of Understanding and encourages local Title IV-E agencies to align their State FFPS program with the System of Care (AB 2083) framework to include comprehensive prevention. Within California's framework for prevention, Title IV-E prevention services under Part I of FFPSA are a fundamental component of the broader comprehensive prevention planning for the State FFPS program. [ACIN I-73-21](#) provides an overview describing the requirements of the State FFPS program, including the populations to be served, allowable services, and prevention services case requirements.

FFPS PROGRAM

In accordance with [WIC §16588](#), a local Title IV-E agency opting into the FFPS Program is required to submit a Comprehensive Prevention Plan (CPP). The components in a CPP will include primary, secondary, and tertiary prevention and intervention strategies and services that support the ability of parents and families to provide safe, stable, and nurturing environments for their children. The Title IV-E agency must include Title IV-E prevention services as a required strategy within the

¹ Pregnant and parenting foster youth do not have to meet imminent risk or candidacy requirements to receive Title IV-E prevention services.

CPP when opting into the FFPS Program in order to receive State FFPS Program Block Grant (State Block Grant) funds.

Consistent with California's overall vision of prevention, the following table describes the three levels of prevention activities for the FFPS Program.

Prevention Level	Activities
Primary Prevention	These activities are directed at the general population to strengthen communities and improve child well-being by focusing on the social determinants of health, defined as the conditions into which people are born, grow, work, live, and age, and the wider set of forces and systems shaping the conditions of daily life.
Secondary Prevention	These activities are offered to populations that have one or more risk factors associated with compromised well-being or child maltreatment, such as poverty, parental substance abuse, young parental age, parental mental health concerns, exposure to violence, and parental or child disabilities. Programs seek to build protective factors and mitigate the risk factors.
Tertiary Prevention	These activities focus on families where child maltreatment has occurred, seeking to mitigate its trauma and reduce the negative consequences of the maltreatment and to prevent its recurrence.

The FFPSA allows for access to Title IV-E funding to pay for direct services, as described above, in the secondary and tertiary levels provided that all federal requirements for eligibility as a candidate for foster care or pregnant/parenting foster youth and services are met. The State Block Grant funds provide additional flexibility, and a county Title IV-E agency can choose to use these funds to incorporate primary prevention strategies as part of its continuum of comprehensive prevention services. State Block Grant funds may also be used to support culturally responsive programs and other secondary and tertiary Evidence Based Programs (EBPs) that fill service gaps but are not yet included in the State's Five-Year Title IV-E Prevention Plan.

Per the requirements set forth in [WIC §16588](#), county child welfare agencies and/or probation departments receiving the State Block Grant for the FFPS Program are required to develop and submit a three-year CPP that outlines the services that the Title IV-E agency will provide that address a continuum of primary, secondary, and tertiary prevention, intervention strategies and services. Interventions and strategies must include culturally appropriate and responsive services that are tailored to meet the needs of local families who are disproportionately represented in the child welfare system including Native American and Alaskan Native families, families of color, and lesbian, gay, bisexual, transgender, queer/plus, children or youth. Upon submission of the Letter of Intent, agencies may use the State Block Grant Funds for direct services retroactive to October 1, 2021 while the county continues to develop its local CPP.

FFPS OPT-IN PROCESS

Submission of the FFPS program Letter of Intent (LOI) and Opt-in Timelines

Submission of a completed LOI (Attachment A) is required for county Title IV-E agencies to inform the state of their early intent to opt into the FFPS program and to begin accessing their local State Block Grant allocation. State Block Grant allocations are eligible to be claimed retroactively beginning October 1, 2021.

Date	Activity
April 30, 2022	FFPS Program Letter of Intent to Opt-in due
January 31, 2023	Final due date for CPPs

Use of the State Block Grant funds are not tied to the federal approval of the state's Five-Year Title IV-E Prevention Plan.

CPP DEVELOPMENT AND REQUIREMENTS

Development of a CPP

County Title IV-E agencies opting into the FFPS program must submit a CPP outlining the agency's plan for primary, secondary and tertiary services and must include Title IV-E eligible service(s) pursuant to the FFPS Program outlined in [WIC §16585 through 16589](#).

Capacity and Readiness Assessments

Prior to the development of a CPP and implementation of the FFPS program, local Title IV-E agencies are encouraged to complete capacity and readiness assessments to determine the agencies' capacity, motivation for change, and level of readiness for successful implementation in several key domains. These assessments are beneficial in order to create a prevention system which is measurable, impactful and sustainable. Local Title IV-E agencies interested in receiving customized technical assistance from the state should complete one or both assessments.

Capacity Assessment

The [Prevention Planning Capacity Assessment](#) is available to assess the motivation, commitment and readiness of the local Title IV-E agency and community partners, to change, develop and implement comprehensive prevention strategies. The Capacity Assessment is comprised of domains that address the motivation for change, provider and system capacity and capability, and policy supports.

Local Title IV-E agencies along with their community partners are encouraged to complete this assessment prior to beginning the planning and implementation process of a CPP. Technical assistance support will be offered from CDSS and subject matter expert partners, in areas identified in the assessment that require further assistance, guidance and/or development.

Readiness Assessment

Local Title IV-E agencies and community partners are encouraged to complete the Readiness Assessment which is comprised of nine domains. These domains will assist the Local Title IV-E agencies and their community partners to determine which domain(s) may benefit from further technical assistance. The Readiness Assessment includes the following domains:

- Funding and Fiscal Models
- Program and Implementation Governance
- Cross-Sector Stakeholder Collaboration
- Prevention Services Program Design
- Policy Regulations and Rules
- Workforce
- Service Quality Outcomes
- Information Systems and Automation
- Reporting Requirements.

The CDSS will use information from the capacity and readiness assessments to provide customized technical assistance. Technical assistance will include but not be limited to learning collaboratives, connection to subject matter experts, webinars, tools and/or other resources.

The Readiness Assessment template will be subsequently released via an All County Information Notice and will be included as part of a Comprehensive Planning Toolkit. It will also be published on the [CDSS FFPSA Website](#).

Asset Mapping and Needs Assessments for Selection of Prevention Strategies and EBPs

Local Title IV-E agencies opting into the FFPS program and their partners must conduct asset mapping and a needs assessment to assist with the selection of prevention strategies and EBPs. The mapping should include a review of relevant demographics and other data or information that will help agencies to understand the service needs of the county or region. The CPP must include a description of the completed analysis and how the information was used to help agencies identify the candidate groups and/or other priority populations and prevention strategies that will be included in the CPP.

The plan will also include the selected EBPs and the rationale for their inclusion based on this analysis. The rationale for selection must be included for each EBP. Local Title IV-E agencies must consult their local behavioral health agencies in the selection of the EBPs for the CPP.

Title IV-E agencies are strongly encouraged to utilize and leverage existing needs or self-assessment processes, and the information contained therein, such as the California – Child and Family Services Review County Self-Assessment as well as assessment information from partners, if desired and if such processes meet the requirements of the FFPS program. The plan must specify which primary, secondary, and tertiary prevention services will be included and how the populations disproportionately represented in the system will be prioritized for such services.

Cross Sector Collaboration

In accordance with [WIC §16585\(b\)\(4\)](#) and [WIC §16587](#), counties opting into the FFPS program are required to collaborate with cross sector partners or entities to meet the needs of children, youth, parents, families, and communities. The process for cross sector collaboration in the development of the CPP, as specified in [WIC §16588](#), must be documented, as well as how such partners will be consulted for ongoing monitoring and continuous improvement of the program. Local Title IV-E agencies are encouraged to engage their [AB 2083](#) System of Care partners. Counties can also leverage existing committees provided they meet the requirements of the FFPS program. Cross sector partners may vary by community, but at a minimum, must include representation from the child welfare agency, probation department, behavioral health agency, local Office of Education, community-based service providers, family resource centers, local Child Abuse Prevention Council, and those with lived experience (parents and youth).

Additionally, counties must engage and invite Indian Tribes to participate or develop a process to engage Indian Tribes in the development of the CPP in accordance with [WIC §16587](#). Counties must also ensure that individuals and families with lived experience, particularly those disproportionately impacted by the child welfare system, are consulted in the development of the plan. Barriers to engagement with any of these required entities or individuals must be documented in detail in the plan.

As an outgrowth of this multi-agency planning, with the implementation of [AB 2083](#) and the development of Memorandum of Understandings (MOUs), local Title IV-E agencies are strongly encouraged to incorporate comprehensive prevention implementation in their [AB 2083](#) MOUs and Interagency Leadership Teams. The work to coordinate the inclusion of comprehensive prevention planning and services into the System of Care is a thoughtful and forward-thinking approach that CDSS supports. To the extent that this group already includes membership that is necessary for cross sector collaboration, few entities would need to be added to meet the requirements of the FFPS program and would more seamlessly ensure quality community planning.

Mental Health Plan Coordination

When engaging in cross-sector planning and collaboration for the purposes of the CPP, agencies must pay special attention to the role of the Mental Health Plan (MHP) specifically as it relates to care coordination for Medi-Cal eligible beneficiaries when a behavioral health service is indicated. Child welfare agencies and probation departments must engage the county MHPs in the FFPS Program opt-in decision process. The FFPS LOI and the local CPP may not be submitted without prior consultation with the MHP. The MHP's input regarding the Title IV-E agency's selection of EBPs for the FFPS Program is necessary when the EBPs include services that are administered by the local behavioral health agency.

Title IV-E agencies that elect to provide FFPS Program prevention services must establish a joint written protocol based on the CDSS and DHCS model joint written protocol pursuant to [WIC §16588\(f\)\(2\)](#), for use among the child welfare agency, probation department, behavioral health agency, and other appropriate entities for determining which program is responsible for payment, in part or whole, for a prevention service provided on behalf of an eligible child. Guidance regarding model joint written protocols will be released in a subsequent ACL.

Child Welfare Agency and Probation Department Collaboration and Designation of Lead Agency

Local Title IV-E agencies are strongly encouraged to make the decision to opt into the FFPS Program together. Joint efforts to collaborate on prevention services will ensure the most comprehensive approach to serving families at the earliest point possible to prevent entry to foster care in both the child welfare and juvenile justice systems. Child welfare and probation agencies will each receive a State Block Grant allocation and together should use the funds to best determine how to accomplish the goals of their county CPP. Additionally, counties in which a probation agency opts into the FFPS program must review and assess whether their existing local Memorandum of Understanding (MOU) for the pass-through of federal Title IV-E funds from the child welfare agency to the probation department requires any amendments or updates to include Title IV-E prevention services under FFPSA.

If the child welfare agency has determined that they will not participate as the lead agency, the probation department can act as the county's lead agency for comprehensive prevention planning. Probation departments that act as the lead agency for purposes of submitting the CPP must ensure that they remain in consultation with other relevant county agencies that serve families and children, Indian Tribes, local community representatives, caseworkers, and individuals and families with lived experience with the child welfare system as well as comply with the requirements and deadlines of the FFPS Program. The CDSS will provide additional technical assistance to probation departments who are designated as lead for the CPP to ensure that requirements are met.

Regional Collaborative Option

The CDSS will accept CPPs that are submitted by a regional collaborative to streamline the delivery and infrastructure of prevention services across counties where such services are not readily available or will be more efficiently administered. If a regional collaborative is considered, agencies must describe how coordination of the required cross sector entities within each county will be consulted and the process for how all reporting requirements will be met. The CDSS will provide additional technical assistance to agencies participating in a regional collaborative to ensure that all requirements can be met.

Technical Assistance Coordination

The Roadmap for Comprehensive Planning and Implementation (Attachment C) is included as a visual guide to help local Title IV-E agencies and their partners understand the overall process to develop a CPP and the voluntary technical assistance that will be provided by CDSS along the way. The CDSS will coordinate with various organizations to provide technical assistance to local Title IV-E Agencies in the implementation of their CPPs. This technical assistance will be voluntary and tailored to the agency's specific needs and is based upon their capacity and readiness assessment results and/or the availability of other resources selected by the agency to assist.

There are several phases outlined within the Roadmap for Comprehensive Planning. The first phase is the Foundational Guidance and Information phase. Within this phase, the CDSS and external partners will provide guidance, training, webinar series, and resources that focus on the basic foundational principles required for prevention work, the FFPS requirements, and elements of the CPP and racial equity.

For the Capacity Building phase, local Title IV-E agencies and their community partners may complete a Capacity Assessment to determine their current system and provider capacity readiness to implement change and ability to move towards a comprehensive prevention approach. Local Title IV-E agencies and community partners will assess the current prevention services array, analyze cross-sector data, and the populations being served. During this phase, local Title IV-E agencies and their community partners will use this information to determine if they will be opting into FFPS.

For the Readiness Building phase, the local Title IV-E agencies, and their community partners may complete a Readiness Assessment, select evidence-based practices and other interventions that best meet the needs of the candidacy and other priority populations.

COMPONENTS AND REQUIREMENTS OF THE CPP

The following elements, consistent with state and federal law and the State's Five-Year Title IV-E Prevention Plan, will be required for inclusion in the CPP. A CPP template will be released that will include the following elements and any additional elements based on the state's approved Five-Year Title IV-E Prevention Plan.

1. A description of the outcome of Asset Mapping and Needs Assessment and any Capacity and Readiness assessments completed by the county that inform the plan's content.
2. A description and rationale for the selection of the candidacy population(s) to be prioritized and the services to be included in the plan.
3. The theory of change or logic model which describes the activities and intended outcomes for children, youth, parents, caregivers, and families. The logic model helps to connect the goals of the cross-sector partnership to align with the intent of both the state and federal legislation.
4. 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.
5. A description of efforts to invite and engage Indian Tribes in cross sector collaboration and input into the CPP.
6. Assurance and plans for meeting the workforce and training requirements established under the state plan. 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.
7. 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.
8. A description of how counties will ensure that all EBPs, whether delivered via contracted entity or by local Title IV-E agency staff, will adhere to model fidelity protocols and an assurance that the local Title IV-E Agency will participate in state level fidelity oversight and coordination.
9. Assurance that the agency will monitor child safety, including conducting periodic risk assessments. Local Title IV-E agencies that contract with community-based organization 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.

10. Strategies for use of the [Integrated Core Practice Model](#) (e.g., candidacy assessment, family engagement, service delivery and transitioning).
11. Inclusion of the local 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.
12. 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.
13. Counties will describe plans to ensure the sustainability of services in the CPP and/or the barriers and needs to ensure that sustainability.
14. Assurances of all other requirements under the state Title IV-E Prevention Program Plan approved by the federal Administration for Children and Families (ACF).

Changes to the CPP

A county shall promptly notify the department of any changes to the written plan, including, but not limited to, an elimination or reduction of services. The county shall consult with other relevant county agencies that serve families and children that include, Indian Tribes, local community representatives, caseworkers, and individuals and families with lived experience with the child welfare system regarding any changes to the plan.

Approval Process

Technical Assistance will be available to local Title IV-E agencies to ensure that their plans meet the aforementioned requirements and include all the required assurances to ensure compliance with federal and state statute and the state's Five-Year Title IV-E Prevention plan. Local Title IV-E Agencies who opt-in and/or submit a CPP may later determine they are unable to fulfill the requirements of the CPP or may subsequently choose to opt out of the FFPS program. Local Title IV-E agencies must promptly notify the CDSS of any changes and may only claim FFPS State Block Grant funds for allowable expenditures prior to opting out.

FFPS Program State Block Grant

In furtherance of the state's vision to create a prevention-focused child and family well-being continuum, the California [Budget Act of 2021](#) appropriated \$222.4 million state General Funds (GF), currently referred to as the FFPS Program State Block Grant (State Block Grant). This funding is a one-time appropriation which must be spent over three state fiscal years (FYs) ending in FY 2024, and is subject to the requirements set forth in [WIC §16588](#). The State Block Grant will be used to support the FFPS Program and/or expand the continuum of prevention services. The FFPS Program must include Title IV-E prevention services and may also include other services to fill gaps in the prevention services continuum as described in [WIC §16588\(c\)\(2\)](#). In accordance with [WIC §16588\(c\)\(3\)\(B\)](#), counties electing to receive State Block Grant funds for the FFPS Program are required to utilize funds toward the nonfederal share of cost of Title IV-E eligible prevention services and allowable administrative activities.

The State Block Grant is also intended to support counties in matching federal funds to create and build the infrastructure of services, and to train and build a professional workforce to deliver prevention services to families whose children are at imminent risk of foster care and to pregnant and parenting foster youth. In addition, child welfare agencies and probation departments can use the funds for services that support a comprehensive approach to prevention including services not yet eligible for IV-E funding and/or automation is available and all federal requirements can be met. Funding can also support primary and secondary prevention strategies and services, as well as evaluation of services not yet rated in the [Title IV-E Clearinghouse](#).

Allocation of the FFPS State Block Grant

In consultation with the County Welfare Directors Association and the Chief Probation Officers of California, the CFL No. 21/22-84 provides specific details regarding the allocation methodology. From the budgeted amount of approximately \$199.0 million, \$1.0 million is set aside for state Title IV-E Agreement Tribes.

Allowable Activities

The State Block Grant supports the FFPS Program development and implementation and can be used for administrative activities and service costs for the delivery of comprehensive prevention services. As stated above, the purpose of such funds includes the creation of a comprehensive prevention continuum that is efficient in maximizing funds for such services to build capacity, program evidence, and a service array that supports families, reduces disproportionality and prevents the entry of children into foster care. Further, the use of the State Block Grant aims at building a sustainable prevention infrastructure and continuum that extends beyond the three-year State Block Grant timeframe.

Allowable activities for the State FFPS Program Block Grant include the following:

- Delivery of evidence-based practices rated “promising”, “supported”, or “well-supported” by the Title IV-E Prevention Services Clearinghouse or for other

services not currently included in the [Title IV-E Clearinghouse](#), with the goal of building future evidence.

- Delivery of prevention services that are sustainable beyond the one-time funding under the State FFPS Program Block Grant.
- Administrative costs to support prevention service delivery such as, but not limited to, case management activities, client-specific service coordination, and case documentation.
- Piloting evidence-based services to support the establishment of an infrastructure, build capacity, and develop programming to prepare for the assurance of fidelity to program models.
- Administrative activities to expand prevention services capacity, including measuring implementation readiness for comprehensive prevention services. This includes gap analyses, readiness assessments, strengths and needs assessments, coordination of an advisory committee, or other administrative functions for comprehensive prevention planning.
- Delivery of direct services beyond those included in the state's Five-Year Prevention Plan or the Title IV-E Prevention Services Clearinghouse that fill service gaps, including gaps in culturally responsive services.
- Supporting evaluations, continuous quality improvement, and monitoring fidelity as required under the Title IV-E prevention program.
- Comprehensive prevention planning and delivery of primary, secondary, and tertiary prevention strategies which may include, but are not limited to, development of service array, contracting with community-based organizations, and program monitoring.
- Prevention services-related training and workforce development activities, including those beyond what is funded by the state.
- Conducting evaluations of culturally responsive services or other services with the purpose of building evidence to support inclusion in the Title IV-E Prevention Services Clearinghouse.

DATA COLLECTION AND REPORTING

The CDSS expects that the CWS-California Automated Response and Engagement System will be utilized as the statewide automation system to collect required data for federal reporting under the Title IV-E prevention program. All local and Tribal Title IV-E agencies will be required to utilize the statewide automation system that will collect necessary data for the FFPS program. The statewide automation system will allow for various agencies to enter the required data for federal reporting and monitoring of model fidelity for each EBP in the state's five-year prevention plan. The data needed from the county Title IV-E agencies will be used for tracking outcomes, for federal reporting requirements, meeting programmatic evaluations, and engaging in continuous quality improvement.

Child specific data must be collected and reported, including basic demographic information of the child, the specific services provided to the child and/or family, total

expenditures for each service provided, duration of services and placement status following the receipt of services. Additionally, data will be required about the extent to which the provision of services reduces the likelihood of foster care placement, increases the use of kinship care arrangements, and improves child well-being.

The CDSS will be providing further guidance with regards to the family prevention service plan, outcome data selection, child safety/risk monitoring, Maintenance of Effort (MOE) requirements as well as the implementation of a statewide automation system.

TITLE IV-E FUNDING REQUIREMENTS

In order to access Title IV-E funding for prevention services, a local Title IV-E agency must meet all federally established programmatic requirements for the Title IV-E prevention services program, and implement the program as outlined in state law contained in [WIC §16585 through 16589](#), in accordance with CDSS guidance. A County Fiscal Letter (CFL) with more detailed claiming instructions on how to access the funding and other fiscal requirements will follow.

All FFPSA Clearinghouse approved EBPs must be delivered in a trauma informed manner, and implementation of these services must be continuously monitored to ensure fidelity to the practice model. A well-designed and rigorous evaluation is required for each EBP; however, this requirement may be waived for services rated well-supported by the [Title IV-E Clearinghouse](#) based on approval by the ACF.

California has included ten “well-supported” EBPs in the initial Five-Year Title IV-E Prevention Plan submitted on August 5, 2021 and has requested federal waivers for this requirement for each EBP included in the plan. The plan must be approved by ACF before Title IV-E funding can be accessed for approved EBP prevention services. California has the ability to amend its state plan to add new EBPs in the future. Per [WIC §16588\(a\)](#), during the first three years of implementation, in consultation with counties and stakeholders, the CDSS will annually review the state’s Five-Year Prevention Plan and determine whether any amendments should be pursued to the evidence-based programs or services included in the plan.

Title IV-E prevention funds must supplement, and cannot supplant, funding used for the state MOE, which is calculated based upon 2014 funding levels for EBPs meeting model fidelity and delivered in a trauma informed manner which were rated in the Title IV-E clearinghouse at the time the state plan was submitted. Counties that opt into the FFPS SBG may be responsible for a portion of the MOE. Additional information regarding the MOE requirements will be provided in forthcoming guidance. Additionally, Title IV-E prevention funding must be the payer of last resort. A county or tribal Title IV-E agency shall not be considered a legally liable third party for purposes of satisfying a financial commitment for the cost of providing those services or programs to an individual for whom that cost would have been paid from another public or private source but for the enactment of FFPSA. Lastly, by FY 2024, at least 50 percent of claimed expenditures must be for the delivery of well-supported services.

The CDSS and Department of Health Care Services (DHCS) are currently developing joint guidance identifying what EBP prevention services may be eligible for reimbursement, in part or whole, under the Medi-Cal program to determine payor of last resort pathways. If DHCS determines that federal approvals are necessary in order to claim Federal Financial Participation (FFP) under the Medi-Cal Program for a prevention service or activity, counties shall not claim the service or activity as a Medi-Cal service until the effective date specified in the federal approval is obtained by DHCS.

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, contact the Family Centered Services and Support Bureau (formerly the Child Welfare Policy and Program Development Bureau) at (916) 651-6160 or at ffpsapreventionservices@dss.ca.gov.

Sincerely,

Original Document Signed By

ANGIE SCHWARTZ, Deputy Director
Child and Family Services Division

CC:
County Welfare Directors Association of California
Chief Probation Officers of California
County Behavioral Health Directors Association of California

LETTER OF INTENT (Attachment A)

_____, 2022

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

Director Kim Johnson:

RE: COUNTY OPT-IN TO THE FAMILY FIRST PREVENTION SERVICES (FFPS)
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 FFPS Program 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 collaboration-opting in together
- 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 §16585\(b\)\(4\)](#)) and [WIC §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.
4. Complete required asset mapping and needs assessments via cross sector collaboration..
 5. Contribute a portion of the state's MOE as negotiated with the CDSS.
 6. Create and begin to implement a CPP due to the CDSS no later than January 31, 2023.

_____ County further agrees that the funds will be used consistent with guidelines set forth in All County Letter XXXXX, 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 Behavioral Health Representative

Date

DESCRIPTION OF READINESS ASSESSMENT DOMAIN ACTIVITIES

(Attachment B)

FUNDING AND FISCAL MODELS

- A landscape scan of all Evidence Based Programs (EBPs) across service sectors has been completed.
- Identification of current funding supporting the delivery of EBPs, and which EBPs had positive outcomes.
- Funding sources and amounts identified to sustain the delivery of the EBPs with positive outcomes.
- Identification of funding opportunities beyond the Federal Family First Prevention Services Act to support comprehensive planning.
- Estimate of the candidacy population and other priority populations to be served including the number of children and families, and their geographic locations, to determine gaps in candidacy and services to priority populations.
- EBPs and other services matched to the candidates and other populations to be served.
- Cost models developed for expansion plans associated with implementation.
- Joint written protocols drafted by local Title IV-E agencies and community partner leadership to determine who will be the payer of each prevention service identified.

PROGRAM AND IMPLEMENTATION GOVERNANCE

- Selected members and confirmed commitment of a collaborative governance structure that will set direction, strategy, allocate resources, oversee progress, ensure stakeholder and community engagement, and makes decisions.
- Governance structure and decision-making protocols established which include guiding the implementation process, identifying and addressing barriers to cross-sector collaboration, and offering input on key strategies.
- The Governance body has defined within its CPP strategies that are trauma informed.
- The Governance body has described how the stakeholder engagement process will incorporate lived expertise into the implementation process.
- The Governance body has identified a stakeholder group that represents those individuals that are disproportionately at-risk for entry into child welfare and juvenile justice systems.

CROSS-SECTOR STAKEHOLDER COLLABORATION

- Identified additional collaborative structures across stakeholder groups that can advise, review, and recommend that validate the CPP.

PREVENTION SERVICES PROGRAM DESIGN

- An entity has been identified as the intermediary with CDSS for technical assistance and implementation support.

POLICY, REGULATIONS AND RULES

- A communication strategy to the public, involved public and private agencies, and to staff has been developed which describes the process by which information regarding prevention policies and new practices and services will be shared.
- A Continuous Quality Improvement (CQI) policy strategy has been developed that includes a scan of current services, and/or creation of policies to improve those services.

WORKFORCE

- Identified training partners to assist in building a workforce to deliver primary, secondary, and prevention strategies, services, and programs.
- A process has been developed by which cases will be assigned for FFPS services and if Community Based Organizations (CBOs) will be contracted to deliver services.
- Local Title IV-E agencies have articulated the role and responsibility of caseworkers assigned the task of reviewing and determining candidacy.
- If a community pathway is implemented, the local Title IV-E agency has determined which staff are responsible for the oversight and monitoring of candidates, and process for candidate referrals from the CBP to the local Title IV-E agency.
- Process is in place for CBPs and practitioners to report to the local Title IV-E agency staff responsible for oversight of Family First Prevention Services (FFPS) Program services.
- Written guidance has been developed on the process of supervision of local Title IV-E agency staff including assignment of FFPS caseload, process of candidacy determination and supervisor review, process by which information will be shared with CBPs, the system of oversight for the above by supervisors and managers.

SERVICE QUALITY OUTCOMES

- Identified tools to assess outcomes measures of EBPs that align with the outcome measures of the local Title IV-E agency and CDSS.
- Through written guidance, the local Title IV-E agency has shared the required outcome measures with the EBP providers.

- Process is in place which ensures data is shared with CDSS to meet federal requirements and for purposes of a statewide evaluation.

INFORMATION SYSTEMS AND AUTOMATION

- Determination has been made as to who is responsible for data entry.
- Determination has been made as to which reports will be generated and disseminated to staff, contractors, CBOs/Family Resource Centers to ensure program integrity.
- An outline of the CQI process has been drafted and responsible parties have been identified to review aggregate data, analyze data, develop action plans to address challenges, and report progress to the CDSS.

REPORTING

- Guidance has been drafted regarding the specific outcome measures to be tracked.
- A team has been established that will review and analyze the aggregate data.
- A process is written for how information will be shared with CDSS.

Roadmap – Attachment C

ROADMAP FOR COMPREHENSIVE PLANNING & IMPLEMENTATION

