



CDSS

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October 24, 2014

COUNTY FISCAL LETTER (CFL) NO. 14/15-30

TO: COUNTY FISCAL OFFICERS
COUNTY WELFARE DIRECTORS
CHIEF PROBATION OFFICERS
COUNTY AUDITOR CONTROLLERS

SUBJECT: COUNTY PROBATION DEPARTMENT SUPPORTING
DOCUMENTATION FOR CLAIMING TITLE IV-E REIMBURSEMENT
FOR PRE-PLACEMENT ACTIVITIES (CANDIDATES)

REFERENCE: [ALL COUNTY LETTER \(ACL\) 14-36](#), DATED MAY 20, 2014 ;
[COUNTY FISCAL INFORMATION NOTICE \(CFIN\) 08-2011](#), DATED
NOVEMBER 4, 2011; [ACL 07-48](#), DATED NOVEMBER 20, 2007;
[ACL 04-32](#), DATED SEPTEMBER 7, 2004

This CFL provides instructions to County Probation Departments (CPDs) on how to claim Title IV-E reimbursement for candidates at risk of imminent removal into a Foster Care placement and how to provide supporting documentation for those claims.

In September 2013, the federal Administration for Children and Families (ACF) Regional Office, along with California Department of Social Services (CDSS), performed site visits at two CPDs. The purpose of the review was to determine how California CPD's identify a candidate for foster care and determines and documents eligibility. The review also examined the accuracy of claims for Title IV-E reimbursement.

As a result of the review, the ACF identified significant systemic concerns regarding how children/youth were identified as candidates for Foster Care. In addition, ACF identified the processes and procedures used to document and submit the associated Title IV-E administrative claims for reimbursement. These concerns led ACF to request CPDs to cease claiming Title IV-E for all candidacy activities/costs beginning October 1, 2013.

The CDSS worked with CPDs to develop a process that could be used by all CPDs to document the costs. The ACF agreed to allow CPDs to submit certification forms and candidacy case count lists for consideration of Title IV-E reimbursement. The

certification forms and case counts must adequately document the youth was an eligible candidate at risk of imminent removal into a Foster Care placement.

Certification Forms Instructions and Submittal Process

The CPDs who wish to seek reimbursement for Program Code (PC) 128 - Probation Title IV-E Pre-Placement Prevention costs for the December 2013 through the June 2014 quarters must submit the following two forms to document the costs for reimbursement. The following forms will be used to request federal reimbursement for the period of October 1, 2013 through June 30, 2014:

- Probation Supporting Documentation for Submitting Claims for the Title IV-E Reimbursement Form (Attachment I); and
- Title IV-E Reasonable Candidacy Certification Form (Attachment II).

The information listed in Attachment I must match the county's adjustment claim for reimbursement. Any adjustments or revisions to the claims must be submitted via the County Welfare Department's (CWD) quarterly County Expense Claim (CEC) during the regular nine-month adjustment quarter (with the exception of the December 2013 quarter) in order to receive reimbursement. Counties must submit separate documentation for each quarter in which they are requesting reimbursement.

Because the due date for December 2013 quarter adjustment claim has passed, the CDSS will allow CPDs to submit the required forms 60 days from the date of this CFL. Adjusted claims for the March 2014 and June 2014 quarters will follow the normal CEC adjustment claim process.

The completed templates must contain all information requested and must be received by CDSS on the following due dates for each quarter. The following chart provides the dates the adjustment claims and completed templates are due to CDSS:

Adjusted PC 128 CEC claim for the Quarter	Completed Templates Due to CDSS	Adjustment Claim Due to CDSS
December 2013	December 24, 2014	Not Applicable
March 2014	December 24, 2014	December 30, 2014
June 2014	February 28, 2015	March 30, 2015

The due dates above allow CDSS the time necessary to review the completed templates and process any necessary corrections. **If counties do not wish to seek reimbursement for any quarter listed above, Attachment I must be submitted to**

show counties are not requesting reimbursement for that particular quarter. Please attach any necessary supporting documentation.

Methodology for Determining Candidacy Costs

Because the time study methodology does not track specific cases or the amount of hours spent on these cases, counties may not have the ability to exactly identify the total costs for activities claimed under PC 128. Therefore, counties can calculate a ratio based on the exact number of cases which are eligible Foster Care candidates. This ratio can be done by dividing the eligible candidate caseload by the original total candidate caseload and applying the resulting percentage to the total costs reported to PC 128- Probation Title IV-E Pre-Placement Prevention.

For example, for the December 2013 quarter, a county originally claimed 100 cases as eligible candidates and after re-evaluating every case, only 30 cases were determined eligible. By dividing 30 cases by 100, the result would be 30 percent. By applying the 30 percent to the total costs claimed to PC 128, 30 percent of the total costs would be eligible for Title IV-E reimbursement.

Form Instructions

Attachment I – Probation Supporting Documentation for Submitting Claims for Title IV-E Reimbursement:

Counties are to enter county name, quarter (the quarter [month, year] for the claiming period), and county contact name, phone number and email address.

Column A: Input the original candidate case count claimed for the quarter.

Column B: Input the total expenditures (identified as Federal/State/County) originally claimed for the quarter.

Column C: Input the total revised eligible candidate case count claimed for the quarter.

Column D: Input the total revised eligible expenditures (identified as Federal/State/County) to be claimed for the quarter. This amount should match the amount reported on the CEC to PC 128 - Probation Title IV-E Pre-Placement Prevention for each individual quarter (For the December 2013 quarter, the amount may not match the adjustment claim total as it has already been submitted).

Attachment I must be submitted by either CWDs or CPDs as secured and confidential files by the indicated due dates to:

California Department of Social Services
Fiscal Policy Bureau
Fiscal Forecasting and Policy Branch
744 P Street, MS 8-10-100
Sacramento, CA 95814

Attachment II - Title IV-E Reasonable Candidacy Certification Form:

Counties must also submit documentation (one per certified case) that supports a determination of candidacy.

Assessment of Title IV-E Candidacy status dates:

Counties will need to enter the month and year of the quarter being assessed on this line.

Supporting documentation information:

Supporting documentation (social investigation and disposition reports, case notes, etc.) can only be used in conjunction with a case plan. However, it is not required that supporting documentation be used with a case plan. A case plan without supporting documentation must have all of the required language to fully support a Title IV-E Candidacy eligibility determination.

Case plan date:

It is required that case plans are signed (by a probation officer, supervising probation officer, youth and parent/legal guardian). Counties need to enter the dates of the signed case plans related to the quarter being assessed.

Date of court order:

This is referring to the date of the detention or disposition order that could show the imminent risk of removal. A court order is not required and if there is no court order, counties can leave this section blank.

Determination date:

Counties need to enter the date the certification form is completed.

Counties are to reassess candidacy eligibility and complete the certification form for each individual candidacy case. Once the form is completed, the form must be signed by the probation officer and supervisor and sent to CDSS. A copy needs to be maintained in the pre-placement case file by the CPD.

Attachment II must be submitted by either CWDs or CPDs as secured and confidential files by the indicated due dates to:

California Department of Social Services
Foster Care Rates Bureau
Foster Care Audits and Rates Branch
744 P Street, MS 8-11-38
Sacramento, CA 95814

The address to use will also be noted on the forms themselves (Please refer to Attachments I and II).

All related documentation submitted to CDSS will be handled confidentially. Questions regarding this CFL may be submitted to fiscal.systems@dss.ca.gov, and reference this CFL in the subject line. Please do not include any confidential or personal information in the email or attachments to the email address above.

Sincerely,

Original Document Signed By:

LILIA A. YOUNG, Chief
Fiscal Forecasting and Policy Branch

Attachments

**Probation Supporting Documentation
 for Submitting Claims for Title IV-E Reimbursement**

The California Department of Social Services (CDSS) is the single state agency with the authority to administer the Title IV-E program. The CDSS shall receive claims from County Welfare Departments for Title IV-E eligible pre-placement (candidacy) related costs associated with activities on behalf of the County Probation Department (CPD). Per [2 Code of Federal Regulations 225](#), “costs must be necessary and reasonable for proper and efficient performance and administration of federal awards in order to be claimed for reimbursement, and must meet all eligibility requirements for federal Title IV-E reimbursement.” The CPD’s claim shall include the “Title IV-E Reasonable Candidacy Certification Form”, supporting each candidacy case has been properly determined. This form will be reviewed by CDSS prior to claim submittal to the federal government for reimbursement. In the CDSS review process, CDSS may request the CPD to provide additional records or information to support the claim. The CDSS may withhold submission of a claim for federal reimbursement pending its receipt and review of any additional records or information CDSS has requested. In addition, CDSS may withhold submission of a claim for federal reimbursement based upon a good faith belief that submission of the claim would lead to a disallowance or deferral of federal Title IV-E funding, otherwise CDSS shall submit these claims for federal reimbursement.

Please provide responses to the following questions, for the December 2013, March 2014 and June 2014 claiming quarters, and submit the necessary supporting documentation (Title IV-E Reasonable Candidacy Certification Form) to the CDSS’ Funding and Eligibility Bureau (Foster Care Audits and Rates Branch) by the dates listed in CFL 14/15-30).

County: _____ Quarter: _____

County Contact Name and Phone Number: _____

County Contact email: _____

A	B	C	D
Number of Candidates Originally Claimed during the quarter	Total Federal reimbursement originally claimed for Program Code (PC) 128 (Federal/State/County)	Number of eligible Candidates once cases were re-evaluated for the quarter	Total eligible Federal reimbursement revised amount for PC 128 (Federal/State/County)

CHIEF PROBATION OFFICER'S CERTIFICATION

I hereby certify, under penalty of perjury, that I am the official responsible for the administration of the Title IV-E Juvenile Justice program in said county; that I have not violated any of the provisions of Sections 1090 to 1096, inclusive, of the Government Code; that the activities reported herein comply with the Title IV-E fiscal requirements set forth in 45 Code of Federal Regulations (CFR) 1356.60.

Signature of Chief Probation Officer	Date
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<i>I hereby certify, under penalty of perjury, that I am the official responsible for the examination and settlement of accounts; that I have not violated any of the provisions of CFR, 7 CFR Part 3018 and 45 CFR Part 93, regarding lobbying restrictions, and sections 1090 and 1906, inclusive of the Government Code; that the amount(s) reported herein has been paid and is properly chargeable as an expenditure or credit to administration of welfare programs in accordance with all provisions of the Welfare and Institutions Code and rules and regulations of the CDSS.</i>	<i>I hereby certify, under penalty of perjury, that I am the official responsible for the examination and settlement of accounts; that I have not violated any of the provisions of CFR, 7 CFR Part 3018 and 45 CFR Part 93, regarding lobbying restrictions, and Sections 1090 and 1906. Inclusive of the Government Code; that the amount(s) reported herein has been authorized by the welfare director; and that warrants therefore have been issued or expenditures/credits otherwise incurred according to law.</i>
_____ Signature of County Welfare Director/Date	_____ Signature of County Auditor-Controller/Date

Please complete a separate form for each impacted quarter and submit to:

California Department of Social Services
Fiscal Policy Bureau
Fiscal Forecasting and Policy Branch
744 P Street, MS 8-10-100
Sacramento, CA 95814

If you have any questions regarding this form, please direct them to fiscal.systems@dss.ca.gov, and reference this CFL and Attachment I in the subject line. Please do not include any confidential information in this email.

TITLE IV-E REASONABLE CANDIDACY CERTIFICATION FORM

IDENTIFYING INFORMATION FOR A POTENTIAL CANDIDACY CASE

Child's Name: _____ **County:** _____

Child's Date of Birth: _____ **Probation Officer:** _____

Local Probation Case Number: _____

Assessment of the TITLE IV-E CANDIDACY status: The following information in the case file documentation between the dates of _____ and _____ support that an assessment of Title IV-E candidacy for foster care was conducted.

Social investigation/history report dated: _____

Psychological report dated: _____

Disposition/Court report dated: _____

Chronological info/narrative dated: _____

Other: _____

Based on the information above, this juvenile was determined to be at imminent risk of removal from the home and placement into foster care, absent preventative pre-placement intervention services.

If the services described in the child's case plan (particularly in the medical, safety/security, emotional/mental health, and family services domains) were not effective, the plan would have been removal of the juvenile from his/her home with placement into foster care.

DOCUMENTATION OF TITLE IV-E CANDIDACY

Date of the Case Plan, signed by all parties (parent or guardian, agency representative), which includes the required language indicating the child will be placed into an allowable foster care setting absent the effectiveness of preventive services: _____

Date of the Court Order indicating the child continues to be at imminent risk of removal from the home and placed in foster care without continued preventive services: _____
