





EDMUND G. BROWN JR. GOVERNOR

June 30, 2015

COUNTY FISCAL LETTER (CFL) NO. 14/15-76

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

SUBJECT: TITLE IV-E CANDIDACY CERTIFICATION REVIEW

REFERENCE: CFL NO. 14/15-29, DATED OCTOBER 29, 2014; CFL NO. 14/15-30, DATED OCTOBER 24, 2014; ALL COUNTY LETTER (ACL) 05-15, DATED JULY 14, 2014; CFL NO. 13/14-56, DATED JUNE 11, 2014; ACL NO. 14-36, DATED MAY 20, 2014; ACL NO. 04-32, DATED SEPTEMBER 7, 2004

The purpose of this CFL is to inform counties of the completion of the Title IV-E candidacy certification process for County Probation Departments (CPDs) and provide instructions about ongoing candidacy claiming and tracking.

Certification Process

The Foster Care Audits and Rates Branch (FCARB) provided technical assistance to counties to ensure proper documentation was used to determine if cases were eligible to claim candidacy costs. Upon FCARB's review and approval of the candidacy cases eligible for federal reimbursement, CDSS initiated the applicable reimbursements. With the exception of two Title IV-E Well-Being Project (waiver) counties, Los Angeles and Alameda, every county submitted certification forms that were used to determine the corrected federal reimbursement amounts for the December 2013 quarter through June 2014 quarters.

Reimbursement Schedule

The California Department of Social Services (CDSS) reviewed the documentation (submitted by the CPDs) for consideration of Title IV-E reimbursement for the December 2013, March 2014 and June 2014 quarters, as follows:

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The December 2013 adjustment quarter A2 for PC 127 and PC 128 were processed and counties should see this reimbursement on the June 2015 Statement of Cash Advances (AA 190).

The March 2014 adjustment quarter A1 including PC 127 and PC 128 was processed and counties should see this reimbursement on the March 2015 AA 190.

The June 2014 adjustment quarter A1 was processed and counties should see this reimbursement on the June 2015 AA 190.

Recoupment

The CDSS has been collecting the outstanding advances. When the new Title IV-E Well-Being Project began on October 1, 2014, the Cohort II Well-Being Project counties advances for October 2014 through February 2015 were not offset; however, collection resumed with the March 2015 advances. The CDSS, in collaboration with Chief Probation Officers of California, are finalizing a recoupment plan until the balances are paid in full.

Tracking and Reporting Candidacy Cases

Based on the direction from the Administration for Children and Families (ACF) Regional Office and for federal reporting purposes, CDSS will continue to report the total eligible candidate cases to ACF via the CB-496 Title IV-E Programs Quarterly Financial Report. Effective with the September 2015 quarter claim, CPDs are required to submit the completed attachment to this CFL (Probation Candidate Cases for Title IV-E Reimbursement) to claim eligible candidate cases for federal reimbursement and without this form costs will be denied. Title IV-E Well-Being Project counties (Cohort I and Cohort II) must also submit the attachment; however, candidate cases should only include Title IV-E eligible cases. The certified attachment must be submitted along with the (Prior to Audit) DFA 325.5 Expenditure Certification for the County Welfare Departments (CWDs) Expense Claim (certification page) of the County Expense Claim (CEC). The attachment should be signed by the Chief Probation Officer prior to submitting it to CWD and the CWD Director and Auditor signatures will be obtained and submitted along with the (Prior to Audit) DFA 325.5 Expenditure Certification for the CWD Expense Claim (certification page) of the CEC.

The CPDs should claim candidacy activities and costs in accordance with claiming instructions provided in <u>ACL No. 14-36</u> and <u>CFL No. 14/15-29</u>. Per ACF, it is critical for CPDs to continue to maintain an internal listing of eligible candidate cases, and maintain supporting case plans and time study documentation for auditing purposes as well.

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Reminders

The CWDs and CPDs are required to maintain their fiscal records for three years, per <u>ACL No. 05-15</u>. In the event of an audit, records must be maintained until otherwise notified. The CDSS also encourages counties to consult their County Counsel to confirm whether specific forms meet any exceptions to the normal three-year time limit.

Monthly advances for administrative claims are generally based on the prior year expenditures. Current county advances have been adjusted based on actual expenditures reported on the December 2014 quarter and the March 2015 quarter.

A current Memorandum of Understanding (MOU) between CWD and CPD is required as the basis for claiming both Title IV-E assistance (maintenance) and Title IV-E administrative funds. The CDSS recommends that the MOU include language regarding the new certification requirement to claim eligible candidate cases for federal reimbursement. The <u>ACL No. 04-32</u> provides further instructions regarding the MOU.

The FCARB will continue to review and monitor CPDs candidacy cases as part of the ongoing county visits to ensure continued federal Title IV-E compliance.

Questions regarding candidacy eligibility or the ongoing county visits should be directed to <u>FC-KGEligibility@dss.ca.gov</u>. Questions regarding this CFL should be directed to <u>fiscal.system@dss.ca.gov</u>.

Sincerely,

Original Document Signed By:

LILIA A. YOUNG, Chief Fiscal Forecasting and Policy Branch

Attachment

California Department of Social Services County Fiscal Letter (CFL) 14/15-76

Probation Candidate Cases 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 <u>2 Code of Federal Regulations 225</u>, "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." Based on direction from ACF and for federal reporting purposes, CPDs are required to submit this form to claim eligible candidacy cases for federal reimbursement, and without this form costs will be denied.

The CPD must provide the number of eligible candidates for each claiming quarter, and submit this certification form with the quarterly County Expense Claim (which includes candidacy costs for reimbursement) certification page.

County:

Quarter:

County Contact Name:_____

County Contact email:

County Contact phone number:

Number of eligible Candidate cases for the quarter:

CHIEF PROBATION OFFICER'S CERTIFICATION

I hereby certify, under penalty of perjury, that the above is true and correct.

Signature of Chief Probation Officer

Date

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Probation Candidate Cases for Title IV-E Reimbursement

CHILD WELFARE DIRECTOR'S CERTIFICATION

I hereby certify, under penalty of perjury, that the above is true and correct.

Signature of County Welfare Director

COUNTY AUDITOR'S CERTIFICATION

I hereby certify, under penalty of perjury, that the above is true and correct.

Signature of County Auditor

If you have any questions regarding this form, please direct them to <u>fiscal.systems@dss.ca.gov</u>, and reference this CFL.

Date

Date