

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



December 8, 2005

COUNTY FISCAL LETTER (CFL) No. 05/06-33

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

SUBJECT: TITLE IV-E STAFF DEVELOPMENT AND TRAINING COSTS

REFERENCE: CFL No. 98/99-19, dated September 25, 1998

This CFL is in response to a Department of Health and Human Services (DHHS) examination of California Department of Social Services (CDSS) practices and previously issued claiming instructions for Title IV-E for Staff Development and Training costs. This CFL clarifies State policy and provides federal regulatory sections and language for claiming costs associated with Staff Development and Training at the enhanced rate of 75 percent and the non-enhanced rate of 50 percent.

FEDERAL REGULATIONS

The DHHS review was based on the federal definition of staff development and training costs that can be claimed at the enhanced 75 percent rate.

45 CFR 1356.60(b) specifies:

(1) Federal financial participation is available at the rate of seventy-five percent (75%) for the costs of:

- (i) Training personnel employed or preparing for employment by the State or local agency administering the plan, and;*
- (ii) Providing short-term training (including travel and per diem expenses) to current or prospective foster or adoptive parents and the members of the state licensed or approved child care institutions providing care to foster and adopted children receiving Title IV-E assistance.*

(2) All training activities and costs funded under Title IV-E shall be included in the State agency's training plan for Title IV-B.

(3) Short and long term training at educational institutions and in-service training may be provided in accordance with the provisions of Sections 235.63 through 235.66(a) of this title.

For purposes of 45 CFR 1356.60(b)(1)(ii), the State or local agency administering the plan is limited to State and County Welfare Departments (CWD) and another public agency that has responsibility for placement and care and has entered into a Title IV-E Section 472(a)(2) agreement with the CWD to operate Title IV-E. The only agency who currently has this agreement is County Probation.

COSTS REIMBURSABLE AT 75 PERCENT FEDERAL FINANCIAL PARTICIPATION (FFP)

The federal regulations at 45 CFR 235.64 established the guidelines for training expenditures that are eligible for reimbursement at the enhanced rate of 75 percent. These costs include:

Salaries, fringe benefits, travel, and per diem for:

- Staff development personnel (including support staff) assigned full time to training functions; and
- Staff development personnel assigned part time to training functions to the extent the time is spent performing such functions.

For agency training sessions, FFP is available for:

- Salaries, fringe benefits, travel and per diem for employees in initial in-services training of at least one week;
- Travel and per diem for employees in agency training sessions away from the employee's work site, or in institutes, seminars, or workshops related to the job and sponsored by professional organizations;
- Salaries, fringe benefits, travel and per diem for experts outside the agency engaged to develop or conduct special training programs; and
- Costs of space, postage, teaching supplies, purchase or development of teaching material and equipment, and costs of maintaining and operating the agency library as an essential resource to the agency's training program.

For training and education outside of the agency, FFP is available for:

- Salaries, fringe benefits, dependency allowance, travel, tuition, books and educational supplies for employees in full-time, long-term training programs (with no assigned agency duties);
- Salaries fringe benefits, travel, tuition, books, and educational supplies for employees in full-time, short-term training programs of four or more consecutive work weeks;
- Travel, per diem, tuition, books, and educational supplies for employees in short-term training programs of less than four consecutive work weeks, or part-time training programs; and
- Employees in full-time, long-term training who make a commitment to work in the local agency for a period of time equal to the period of which financial assistance is granted.

For training and education for persons preparing for employment with the local agency, FFP is available for:

- Stipends, travel, tuition, books and educational supplies for persons preparing for employment with the State or local agency, as long as the following conditions are met:
 - The individual is selected by the local agency and accepted by the school;
 - The program is approved by the State;
 - The individual has a legally binding commitment to work for the local agency for a period of time at least equal to the period for which financial assistance is granted;
 - The local agency offers the individual a job within two months after completion of training;
 - The State evaluates the program;
 - The local agency keeps a record of the employment of persons trained which also specifies the reason for non-employment; and
 - Any recoupment of funds from trainees failing to fulfill their commitment shall be deducted from total training costs.

In addition, FFP is available for:

- Payments to educational institutions to develop, expand, or improve training for agency personnel for salaries, fringe benefits, and travel for instructors, clerical assistance, teaching materials, and equipment; and
- Providing short-term training (including travel and per diem) to current and prospective foster or adoptive parents, and the members of the State-licensed or approved child care institution providing care to foster and adoptive children receiving Title IV-E assistance.

COSTS REIMBURSABLE AT 50 PERCENT FFP

The costs of training any other county staff are eligible only for the 50 percent Title IV-E administrative match rate provided that the staff is contracted by the CWD to perform a Title IV-E administrative function and the training is necessary for such staff to perform the Title IV-E administrative function, e.g. multi-disciplinary teams.

COST NOT ELIGIBLE UNDER STAFF DEVELOPMENT AND TRAINING

The federal regulations do not allow the following costs to be claimed as staff development and training, but may be claimed under Title IV-E administrative costs:

- Salaries of supervisors (day-to-day supervision of staff is not a training activity); and
- Employment of students on a temporary basis, such as in the summertime.

COSTS NOT ELIGIBLE FOR TITLE IV-E

FFP is for administrative costs necessary for the proper and efficient administration of the Title IV-E State Plan. Therefore, county staff, which are not necessary for the administration of the Title IV-E foster care program, are not eligible for claim Title IV-E for training.

Training costs must be relevant to the operation of the Title IV-E foster care and adoption assistance programs. For example, training mandated reporters is not eligible for Title IV-E at any rate. Similarly, training for hotline workers, and emergency response workers such as investigating allegations of child abuse and neglect is not considered necessary for administering Title IV-E.

DISCOUNT RATE

It should be noted that all Title IV-E training costs will have a non-federal discount rate applied pursuant to California's countywide cost allocation plan. The discount rate is applied automatically on the county expense claim using each county's individual non-federal discount rate.

Please ensure local procedures for claiming Title IV-E training costs are in compliance with federal regulations.

If you have any questions regarding this CFL, please to submit your questions to fiscal.systems@dss.ca.gov.

Sincerely,



GLORIA MERK
Deputy Director
Administration Division

c: CWDA