

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



May 21, 2007

COUNTY FISCAL LETTER (CFL) No. 06/07-36

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

SUBJECT: CALIFORNIA COUNTY WELFARE DEPARTMENT (CWD) COST ALLOCATION PLAN (CAP) CHANGES FOR THE 2005/2006 FISCAL YEAR (FY)

This CFL is in response to Administration of Children's and Family (ACF), Department of Health and Human Services (DHHS) examination of the California Department of Social Services' (CDSS) County Cost Allocation Plan (CCAP) for the State Fiscal Year (SFY) 2005/2006.

As a result of the DHHS' review, CDSS implemented changes to program code descriptions (PCD), EDP methodologies and the CCAP. Specifically, program and time study code descriptions were revised to provide clarity and update allowable activities. See below for summary of changes.

I. SOCIAL SERVICES FUNCTION, Program Code Descriptions

A. Social Services

We have revised the Time Study Staff Section of the PCD's to clarify "Nonallocable Activities". See changes below.

"Caseworkers" are CWD staff who performs activities that benefit public assistance recipients. Caseworker activities may include any of the following: 1) case management; 2) the determination of eligibility for grants and services; 3) grant maintenance; 4) needs assessment; 5) arranging for and providing employment training services or social services; and 6) welfare fraud investigations. See Manual of Policies and Procedures (MPP) Section 25-810.4 entitled "Nonallocable Activities" that states: "This is a provision shown on each time study to record time for the activities that are not considered either Social Services or Eligibility functions. An example would be the time a social worker or eligibility worker spends on administrative duties."

B. CODE 0053 STAP - CASE MANAGEMENT

The last sentence has been deleted in the activity description for Code 0053. See changes below.

Includes activities directed to a child in adoptive placement, or activities immediately preceding an adoptive placement, such as a child adoptability assessment, adoptive applicant screening, and

home study.

C. CODE 1456 CWS – TRAINING

The last sentence has been modified for Code 1456 CWS-Training. See changes below.

This Program Code (PC) for CWS Training, at the enhanced rate of 75 percent, is for people employed or preparing for employment in all classes of positions by the State or local agency administering the program. Training is limited to topics necessary for performing the following specific foster care program administrative functions.

- Referral to services
- Case plan development
- Case Management and Supervision
- Preparation for and participation in judicial determinations
- Placement of the child
- Case reviews
- Recruitment and licensing of foster homes and institutions and,
- Eligibility determination

D. Code 1465 CWS-Services

The term “Non-Federal” has been deleted from the above title for Program Code 1465 CWS - Services. Below is the program activity description:

The individual child's case plan shall be the basic guideline for the provision of child welfare services. Services include, but are not limited to, the following:

- Providing counseling or other therapeutic services to a child or to the child's family in order to ameliorate or remedy personal problems, behaviors, or home conditions, as referenced;
- Providing homemaking instruction, through discussion and example when parent/guardian functioning can be improved by teaching more effective child care skills and home maintenance. MPP 31-002(t)(1);
- Parenting training.

E. Code 0591 CWSOIP/NONFED SGF/COHORT I

The first sentence of the activity descriptions for Code 0591 has been deleted. See changes below.

These activities are required to implement the County Improvement Plans and include services provided to a child and/or the child's family. The range of service activities shall include, but not be limited to, the following: Emergency/Temporary in-home caretakers; therapeutic day services; teaching and demonstrating to homemakers; parenting training services and respite care.

F. CODE 1481 CWS - PRE-PLACEMENT PROGRAM
CODE 1482 CWS - FAMILY MAINTENANCE PROGRAM
CODE 1483 CWS - FAMILY REUNIFICATION PROGRAM
CODE 1484 CWS - PERMANENT PLACEMENT PROGRAM

The last sentence of the description for Codes 1481-1484 has been modified. Also, the eighth bullet was deleted under allowable activities. See changes below.

Includes activities directed to a specific child when the child remains in the home or in out-of-home placement, including relative placements and emergency shelter care. Included is the development of the case plan, which indicates specific services necessary to meet the protective needs of the child. The following are allowable activities:

- Assessing child's/family's needs and developing a case plan as indicated in regulations;
- Referrals to services when necessary;
- Arranging for pre-placement visits;
- Working with foster parents to prepare them to receive a child;
- Monitoring progress in meeting case plan objectives and updating the case plan;
- Management and supervision of the case, participation in case conferences, permanency planning meetings, and administrative reviews;
- Recruitment activities, developing and distributing resource material, consulting and coordinating with service providers and community based organizations;
- Do not include court document preparation or petition filing - these are Code 147 (CWS-Court Related Activities).
- Visits for non-group home foster care placements (i.e., relatives and foster family homes). See TSC 5771 for visits related to children in group home placements; and
- Travel time associated with any of the above activities.

The deleted activity description is captured in PC 5151 PSSF – Family Preservation Services.

G. Code 1551 – Foster Family Licensing

The first sentence of the activity description for Code 1551 has been changed. The “approval” of family foster homes has been removed and is referenced in Code 0071 Relative/Nonrelative Home Approval Process. See changes below.

Includes recruitment, study, certification, and licensing of foster family homes for children; re-certification, renewal, suspension, revocation, and complaint investigation actions affecting licensing; public information on out-of-home care programs and supporting participation of the public in such care; licensing information/data system activities; and travel related to any of these activities.

Includes the following training activities for the Foster Family Licensing Program:

- Preparing and providing training to prospective foster parents on foster family home licensing requirements;
- Participating in continuing training received after induction training;

Participating in short term training provided by outside agencies; and
Participating in training conferences.

H. CODE 1771 - FAMILY PRESERVATION PROGRAM (FPP) - PRE-PLACEMENT PREVENTION CASE MANAGEMENT

The description of activities has been modified for Code 1771. See changes below.

Includes activities directed to a specific child when the child remains in the home to prevent out-of-home placement. This code does not include time associated with the delivery of or documentation of family preservation preventative services. Included with this code is the development of the case plan which indicates specific services necessary to meet the protective needs of the child. Following are allowable case management activities:

- Assessing needs and developing a case plan as required
- Referrals for services
- Monitoring the case plan
- Management and supervision of the case

FPP Training is for people employed or preparing for employment in all classes of positions by the State or local agency administering the program. Training includes the administration of the foster care program such as referral to services, case plan development, case management and supervision.

I. CODE 5821- KINSHIP SERVICES

The activity description for Code 5821 was previously omitted from the PCDs. See changes below.

Activities include the implementation and expansion of existing Kinship Support Services Program, through AB 1193 (Chapter 794, Statutes of 1997). The programs provide community based family support services to relative caregivers and children placed in their homes by juvenile court and those at risk of dependency or delinquency. Also provides post permanency services to relative caregivers who become legal guardians or adoptive parents of formerly dependent children.

Claiming Instructions

Please note that these CCAP changes are retroactive to the SFY 2006/07. This may require adjustment claims for the September 2006, December 2006, and March 2007 quarters. If time studies include unallowable activities, then counties should revise their time studies on the DFA55.

II. OTHER PUBLIC WELFARE FUNCTION, Program Code Descriptions

A. CODE 3451 - AFDC FOSTER CARE (FC) ELIGIBILITY

The activity descriptions have been modified for Code 3451. See changes below.

Includes the following activities performed on behalf of FC cases: conducting eligibility determinations and benefit payment functions; various intake activities, such as screening, approvals, denials, and other dispositions of requests for aid, including restorations; budget

computations and authorizing actions; referrals to other public assistance programs and services for potential eligibility.

Claiming Instructions

Please note that these CCAP changes are retroactive to the SFY 2006/07. This may require adjustment claims for the September 2006, December 2006, and March 2007 quarters. If time studies include unallowable activities, then counties should revise their time studies on the DFA55.

III. EDP Methodology Changes

A. CWS/CMS (SACWIS) and Non-CWS/CMS (Non SACWIS)

The federally approved cost allocation methodology for CWS/CMS as described in the CCAP has been modified. Counties must begin using this new allocation methodology beginning with claims submitted in FY 2007/08. For all county claims submitted for FY 2006/07, the state will use the new CWS/CMS cost allocation methodology for program code 536 and implement a state level adjustment.

The federal government is requiring CWS/CMS costs be allocated to all benefiting programs, not just Title IV-E. CDSS developed a new cost allocation methodology, which the federal government approved for FYs 2005/06 and 2006/07. The allocation methodology for Non-CWS/CMS costs remains unchanged. Counties have the option of entering EDP costs into the CEC using the previous 4 quarters time studies, current quarter, by function, or direct to program. Counties must choose the methodology that most accurately identifies the benefiting programs

Previously, CWS/CMS costs benefiting program(s) outside of Title IV-E were allocated to the appropriate benefiting program(s) by using case worker time study hours and Title IV-E SACWIS costs were direct charged to PC 536. The federal government now requires an allocation to all benefiting programs using statewide allocation percentages, which will be updated annually. This new methodology applies to staff that time study to CWS/CMS and procurement costs. Please, see step 4 below for relevant benefiting programs.

The newly approved CCAP requires the following steps counties should take in allocating and claiming CWS/CMS (SACWIS) costs:

1. Determine whether a procurement is CWS/CMS eligible by using the SACWIS/Non-SACWIS matrix (CFL No. 03/04-27) as a guide.
2. Determine the portion of the procurement that is CWS/CMS eligible. A county can decide how to determine what portion of the purchased good/service is CWS/CMS eligible based on the most effective and efficient methodology for the county. Suggested options would be computer generated statistics, the use of observations of staff activity, or surveys completed by staff in which they report time spent on CWS/CMS versus other Non-CWS/CMS activities such as county applications, email or the internet.

Examples: (In all of the following examples, the county is purchasing only workstations for their child welfare staff.)

For a one week period from XX/XX/XX to XX/XX/XX, staff in a normal Child Welfare worker unit of the agency were observed and it was determined that XX% of the time they were using their computer, it was for input or viewing of information in CWS/CMS.

For a one week period from XX/XX/XX to XX/XX/XX, child welfare workers in our agency were requested to track the amount of time that they spent each day on their computer. During that period of time, they tracked how much time was spent accessing CWS/CMS versus other county applications, email or the internet. Based on this survey, the county has determined that XX% of the cost of the purchase is CWS/CMS eligible.

The county has a dedicated help desk which works with child welfare workers. Through tracking of help desk tickets and observation of the workers the help desk staff assist from XX/XX/XX to XX/XX/XX, the county has determined that XX% of the time that social workers spend using their computers is in using the CWS/CMS application.

3. Calculate the CWS/CMS costs for the purchase. To obtain the CWS/CMS costs, multiply the percentage of the purchase that is determined to be CWS/CMS to the total costs of the purchase.

In choosing a methodology to determine the percentage allocable to CWS/CMS and Non-CWS/CMS, the county must determine that the methodology and time period is representative of on-going county workload and operations.

4. Allocate CWS/CMS costs to benefiting programs based on the federally approved methodology, using the allocation percentages, as shown below:

Program Code	Program Name	Percent -	Federal Program
536	SACWIS	0.7849	Title IV-E
513	EA – ER	0.1382	TANF
544	CWS MPI (AB 908)	0.0005	TANF
556	CWS MPS (AB 908)	0.0009	TANF
144	CWS - Health Related	0.0651	Title XIX
150	EPSDT	0.0001	Title XIX
168	FPP - Health Related	0.0003	Title XIX
182	ILP - Case Management	0.0031	Chafee ILP
184	ILP - Services	0.0054	Chafee ILP
135	SSI-SSP / OHC	0.0003	State Program
175	FPP - Services / Non-Federal	0.0003	State Program
588	STOP - Assessment / Case Plan	0.0009	State Program

In instances where the county does not have an allocation for all the program components listed above, the county must roll the share of costs of a program code into another program code that has the same program funding source. For example, if code 144 is not valid in a county, the share of costs would be included in code 150 or 168, both of which are Title XIX funded.

Additional examples are provided in the County APD guidelines on the Project tab of the CWS/CMS website, see link provided:

http://www.hwcws.cahwnet.gov/Projects/CFP/APD/2007/022807_County_APD_Guidelines.doc

Please note, in the current environment these costs are entered on the DFA 325.1A, EDP Direct-to-Program input screen of the County Expense Claim.

Counties having any questions regarding this CFL should use the fiscal.systems@dss.ca.gov e-mail address to make any related inquiries.

Sincerely,

(original signed by)
DOUGLAS D. PARK, Chief
Fiscal Systems and Accounting Branch

Enclosure

c: CWDA