Florida’s Path Forward: Separating Board Rates for Child Caring Agencies (CCA) and Child Placing Agencies (CPA)
Agenda

• Refresher on Title IV-E
• Federal Guidance from CWPM
  • CCA focus
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• Review of Template
• Questions?
Refresher on Title IV-E
# The Social Security Act

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Foster Care Fund Categories

• Maintenance Payments
• “Administration”
• SACWIS
• Training
• Demonstrations
Basic Requirements of IV-E

To be eligible under IV-E, expenditures must be:

• An **eligible service**
  o Administration
  o Maintenance

• On behalf of an **eligible child**:
  o Who meets certain removal and placement standards, and
  o Who’s family at the time of removal would have been eligible for AFDC on July 16, 1996.

• Who resides in an **eligible setting**:
  o A licensed family foster home, or
  o A licensed child care institution, AND
  o Meets all safety requirements.
Foster Care Administration

Penetration Rate X 50% with some exceptions

In-Placement Administration
- Case Planning and Management
- Eligibility Determinations*
- Provider Management and Agency Management

Candidate Administration Costs (referred to as Pre-Placement Activities)

Training Costs – Staff, Provider and Professional Partner
Allowable Administrative Costs

(1) Eligibility, fair hearings and appeals

(2) The following are examples of allowable administrative costs necessary for the administration of the foster care program:
   (i) Referral to services;
   (ii) Preparation for and participation in judicial determinations;
   (iii) Placement of the child;
   (iv) Development of the case plan;
   (v) Case reviews;
   (vi) Case management and supervision;
   (vii) Recruitment and licensing of foster homes and institutions;
   (viii) Rate setting; and
   (ix) A proportionate share of related agency overhead.
   (x) Costs related to data collection and reporting.
Non-Allowable Administrative Costs

(3) Allowable administrative costs do not include the costs of social services provided to the child, the child's family or foster family which provide counseling or treatment to ameliorate or remedy personal problems, behaviors or home conditions.
The term “foster care maintenance payments” means payments to cover the cost of (and the cost of providing) **food, clothing, shelter, daily supervision, school supplies, a child’s personal incidentals, liability insurance with respect to a child, reasonable travel to the child’s home for visitation, and reasonable travel for the child to remain in the school in which the child is enrolled at the time of placement**. In the case of **institutional care**, such term shall include the **reasonable costs of administration and operation** of such institution as are necessarily required to provide the items described in the preceding sentence.

*Separate FMAP for Maintenance paid under State-Tribal Agreements*
Child Welfare Policy Manual (CWPM) – CCA focus
Children’s Bureau
Child Welfare
Policy Manual
Section 8. Title IV-E

Web site link
Under title IV-E, how is the term "foster care maintenance payments" defined?

Answer
Under title IV-E, the term "foster care maintenance payments" is defined (in section 475(4) of the Social Security Act) as: "...payments to cover the cost of (and the cost of providing) food, clothing, shelter, daily supervision, school supplies, a child's personal incidentals, liability insurance with respect to a child and reasonable travel to the child's home for visitation and reasonable travel for the child to remain in the school in which the child is enrolled at the time of placement. In the case of institutional care, such term shall include the reasonable costs of administration and operation of such institution as are necessarily required to provide the items described in the preceding sentence."

The cost items listed in the first sentence apply equally to family foster care and institutional foster care. The costs of providing the items may include costs such as local transportation necessary for either a foster parent or institution to provide the items. However, allowable costs do not include reimbursement in the nature of salary for the exercise by the foster family of ordinary parental duties.
What are the elements of costs for foster care maintenance payments under section 475 (4) of the Social Security Act (the Act)?

Answer

There are three groups of costs:

(1) Items of Cost: Clearly, all items of cost specifically enumerated in the Act are allowable. In addition, questions may arise about the interpretation of items, listed in the Act, particularly, "daily supervision."

(a) "Daily supervision" in family foster care - "Daily supervision" in family foster care may include such an item as child care. A foster family parent who is working while a foster child is not in school will have to arrange for some form of alternate care, such as day care, for the daily supervision of the child. However, as was stated in the legislative history of P.L. 96-272, "payments for the costs of providing care to foster children are not intended to include reimbursement in the nature of a salary for the exercise by the foster family parent of ordinary parental duties." (p. 50, House of Representatives, Report No. 96-900, April 23, 1980.)
"Daily supervision" in institutional foster care - "Daily supervision" in institutions is a limited function. It includes routine day-to-day direction and supervision. It does not include social services.

Social services under family foster care or institutional foster care - As with all items of care and for costs of administration and operation, the critical factor is the activity being performed and not the title or position of the performer. "Social services" are not allowable cost items as title IV-E maintenance payments under any circumstances, regardless of what type of person provides them.

Examples of unallowable "social services" are: counseling and therapy to help with a child's adjustment at the institution; counseling and therapy to help a child resolve the problem(s) for which he or she was placed; counseling and therapy with the child and his or her biological family to resolve the difficulties that led to the need for placement; counseling and therapy to plan for the return of the child to the community; and psychological or educational testing, evaluation, and assessment. These costs may be claimed under other programs, e.g., title IV-B or title XX (Social Services Block Grant Program) of the Act or a State-funded program.
(d) Other items in family or institutional foster care - Questions have been raised regarding some other specific items. "Recreation" is not enumerated in the Act and cannot be regarded as an element of these costs except where it clearly substitutes for otherwise necessary daily supervision, e.g., day care, as discussed in (a) above. In such a case, only the minimal costs for the eligible child and caretaker may be included.

(2) Costs of providing: In both family and institutional foster care, the costs of providing the items listed in section 475 (4) may be included in payments. This is a limited added cost. However, recreation generally is not a "cost of providing". When it is a form of daily supervision, as stated in paragraph (1)(d) above, it is allowable.

In an institution, the cost of providing the items might include the costs of activities performed by cottage parents or other persons filling such a role in their daily supervision of eligible children. The key is the activity being performed rather than the occupation or profession of the individual. And, to reiterate, only the proportion of costs related to providing allowable items to title IV-E children is eligible for payment.
Inquiry has also been made regarding two other functions and performers. The costs of providing daily supervision of eligible children in an institution by a social worker is allowable; however, the costs of a social worker providing counseling and guidance related to a child's development, as contrasted with routine supervision, would not be an allowable cost. Further, only the proportion of costs attributable to title IV-E children would be allowable.

Another question relates to the costs of (1) dispensing over the counter medicines, (2) supervising the administration of prescribed medicines, (3) administering first aid and (4) diagnosing illnesses. The activities performed under numbers (1) and (2) and routine activities under (3) would be allowable. The activity described under (4) is more specialized and is not a cost of providing daily supervision. It is unlike an activity which a family foster parent would be expected to be able to perform in the course of providing "daily supervision." Again, only the proportion of costs of providing allowable items to title IV-E children are eligible for Federal financial participation (FFP).
(3) Reasonable costs of administration and operation in an eligible institution: Section 475 (4) also permits payment on behalf of eligible children in institutions to include "the reasonable costs of administration and operation of such institution as are necessarily required to provide the items [described in the same paragraph]." Factors related to the allowability of costs therefore include:

(a) The institution must meet the definition of a "child-care institution" in section 472 (c)(2) of the Act. Costs borne by child placing agencies are not eligible for FFP.

(b) The costs of administration and operation must be "necessarily required to provide the items described in [paragraph 475 (4)]." Thus, the proportional cost of a bookkeeper, food workers, and supervisor of cottage parents for the institution would be allowable. The costs of providing counseling or diagnosis of illness by a social worker or nurse or costs of the staff of a parent agency not employed by the institution would not be allowable.
The costs must be "reasonable", that is, no more than the customary costs for performing similar functions in similar institutions, e.g., in size, and type of children, such as handicapped children.

The costs must be allocated for title IV-E children on whose behalf payments are made.

The costs must be allowable under 45 CFR Part 75. (Note: This answer previously referenced 45 CFR Part 92. 45 CFR Part 75 supersedes 45 CFR Part 92 effective December 26, 2014 (79 FR 75871, Dec. 19, 2014).)

Given these factors, the issue of cost allocation is important. Various cost allocation methods, e.g., random moment studies or actual counts, may be used by institutions in developing their cost allocation plans. The State agency must approve the plan as a part of its approval of rates.
In child care institutions, are costs that are normally associated with family activities such as going to a baseball game, picnics, etc., allowable for Federal financial participation (FFP) in the title IV-E Foster Care Maintenance Payment Program? What about staff time for supervision, transportation, tickets, etc.?

Answer
Reimbursement of recreation costs per se is not permitted under title IV-E (see the definition of "foster care maintenance payments" under section 475(4) of the Social Security Act). Since section 475(4) includes "a child's personal incidentals," however, the reasonable and occasional cost of such items as tickets or other admission fees for sporting, entertainment or cultural events or dues for clubs are reimbursable under title IV-E Foster Care as a part of the maintenance payment.

The costs of staff necessary to provide supervision to insure the well being and safety of children on or off campus are allowable even if the event has recreational components. The costs of staff merely accompanying the children but not necessary for their supervision are not allowable.

Transportation as a separate item of expense is not allowable except for reasonable travel to the child's home for visitation and reasonable travel for the child to remain in the school in which the child is enrolled at the time of placement.
CWPM 8.3B.1Q9

The definition of "foster care maintenance payments" at 475(4)(A) of the Social Security Act includes payments to cover the cost of (and the cost of providing) a child's "personal incidentals." For title IV-E purposes, what does the term "personal incidentals" include?

Answer
The Social Security Act requires that the title IV-E foster care maintenance payment is to cover the cost of (and the cost of providing), among other things, the personal incidentals of the child in foster care. These items are typically purchased for the child on an occasional, as-needed basis and may include a variety of items.

Specifically, we consider the following categories of expenditures examples of "personal incidentals": items related to personal hygiene; cosmetics; over-the-counter medications and special dietary foods; infant and toddler supplies, including high chairs and diapers; fees related to activities, such as Boy/Girl Scouts; special lessons, including horseback riding; graduation fees; funeral expenses; and miscellaneous items such as stamps, envelopes, writing paper, film and the cost of film development for a personal camera.

Further, as stated in section 8.3B.1 of the Child Welfare Policy Manual (CWPM), the "reasonable and occasional" costs of such items as tickets or other admission fees for sporting, entertainment or cultural events or dues for clubs are reimbursable under the foster care maintenance payment as personal incidentals.

The State may provide for these costs in the basic foster care maintenance payment or a separate payment to the foster parent.
Identification of Costs - CCA

*Is it an allowable maintenance cost?*

- Daily supervision
- Food
- Clothing
- Shelter (i.e. facilities)
- School supplies
- Personal Incidentals
- Transportation
- “Cost of providing” any of the above
Identification of Costs - CCA

*If not, is it an allowable administrative cost?*

- Case management and supervision; referral to services; preparation for and participation in judicial determinations; development of the case plan; Case reviews;

*If not, assume it is unallowable for Title IV-E*

- Recreation except as specifically authorized
- Social services (i.e. counseling, Behavioral Health Overlay Services (BHOS), mental health assessments)
- Medical services
- Educational services
Child Welfare Policy Manual (CWPM) – CPA focus
Under title IV-E, how is the term "foster care maintenance payments" defined?

Answer
Under title IV-E, the term "foster care maintenance payments" is defined (in section 475(4) of the Social Security Act) as: "...payments to cover the cost of (and the cost of providing) food, clothing, shelter, daily supervision, school supplies, a child's personal incidentals, liability insurance with respect to a child and reasonable travel to the child's home for visitation and reasonable travel for the child to remain in the school in which the child is enrolled at the time of placement. In the case of institutional care, such term shall include the reasonable costs of administration and operation of such institution as are necessarily required to provide the items described in the preceding sentence."

The cost items listed in the first sentence apply equally to family foster care and institutional foster care. The costs of providing the items may include costs such as local transportation necessary for either a foster parent or institution to provide the items. However, allowable costs do not include reimbursement in the nature of salary for the exercise by the foster family of ordinary parental duties.
What are the elements of costs for foster care maintenance payments under section 475 (4) of the Social Security Act (the Act)?

Answer
There are three groups of costs:

(1) Items of Cost: Clearly, all items of cost specifically enumerated in the Act are allowable. In addition, questions may arise about the interpretation of items, listed in the Act, particularly, "daily supervision."

(a) "Daily supervision" in family foster care - "Daily supervision" in family foster care may include such an item as child care. A foster family parent who is working while a foster child is not in school will have to arrange for some form of alternate care, such as day care, for the daily supervision of the child. However, as was stated in the legislative history of P.L. 96-272, "payments for the costs of providing care to foster children are not intended to include reimbursement in the nature of a salary for the exercise by the foster family parent of ordinary parental duties." (p. 50, House of Representatives, Report No. 96-900, April 23, 1980.)
The definition of "foster care maintenance payments" at 475(4)(A) of the Social Security Act includes payments to cover the cost of (and the cost of providing) a child's "personal incidentals." For title IV-E purposes, what does the term "personal incidentals" include?

Answer
The Social Security Act requires that the title IV-E foster care maintenance payment is to cover the cost of (and the cost of providing), among other things, the personal incidentals of the child in foster care. These items are typically purchased for the child on an occasional, as-needed basis and may include a variety of items. Specifically, we consider the following categories of expenditures examples of "personal incidentals": items related to personal hygiene; cosmetics; over-the-counter medications and special dietary foods; infant and toddler supplies, including high chairs and diapers; fees related to activities, such as Boy/Girl Scouts; special lessons, including horseback riding; graduation fees; funeral expenses; and miscellaneous items such as stamps, envelopes, writing paper, film and the cost of film development for a personal camera.

Further, as stated in section 8.3B.1 of the Child Welfare Policy Manual (CWPM), the "reasonable and occasional" costs of such items as tickets or other admission fees for sporting, entertainment or cultural events or dues for clubs are reimbursable under the foster care maintenance payment as personal incidentals.

The State may provide for these costs in the basic foster care maintenance payment or a separate payment to the foster parent.
Please clarify how funds may be disbursed for allowable child care.

**Answer**

States may include the cost of allowable child care in the basic foster care maintenance payment or may make a separate maintenance payment directly to the licensed provider. For example, if, in a particular foster family, both parents work, the State may include the cost of child care in the maintenance payment made to that family or may pay the licensed provider directly. Regardless of the payment method chosen, the State must be able to provide documentation to verify allowable expenditures.
Are all costs for day care/baby-sitting services provided to title IV-E eligible children reimbursable as a title IV-E foster care maintenance cost? If not, for which of the following purpose(s) may daycare/babysitting services be claimed for reimbursement:

(1) illness of the foster parent;
(2) respite care;
(3) foster parent attendance at: administrative case review/judicial reviews, case conferences/team meetings, school conferences/ET (Pupil Evaluation Team), or foster parent training;
(4) foster parent visits with a child who is temporarily out of the home, e.g. child hospitalized or at camp;
(5) enhancement of a foster child's social skills/peer relationships/socialization; or,
(6) special needs of foster child best met in a day care setting.
The legislative history of Public Law 96-272 (p. 5, House of Representatives, Report No. 96-900, April 23, 1980) states that "payments for the costs of providing care to foster children are not intended to include reimbursement in the nature of a salary for the exercise by the foster family parent of ordinary parental duties." Since foster care maintenance payments are not salaries, foster parents must often work outside the home. Therefore, child care that provides daily supervision during a foster parent's working hours when the child is not in school is an allowable expenditure under title IV-E. Child care costs which facilitate the foster parent's attendance at activities which are beyond the scope of "ordinary parental duties" are allowable expenditures as well.
Child care provided to a foster child to facilitate a foster parent's participation in activities that are within the realm of "ordinary parental duties" or child care activities which are deemed a social service are not reimbursable under title IV-E. The items enumerated in the question were assessed based on these criteria.

(1) Illness of a foster parent: ensuring supervision for one's children during one's illness is an ordinary parental duty. Therefore, child care provided to a child in foster care due to the illness of the foster parent is not an allowable expenditure under title IV-E foster care maintenance.

(2) Respite care: respite care is defined in federal regulation as an allowable title IV-B child welfare service and is not an allowable expenditure under title IV-E foster care maintenance. States may use title XX to fund respite care services.
(3) Foster parent attendance at:

a. administrative case/judicial reviews: this activity is not an ordinary parental duty. Therefore, child care is an **allowable** expenditure under title IV-E foster care maintenance when the foster parent(s) is required to attend administrative case/judicial reviews without the foster child;

b. case conferences/team meetings: when the foster parent is mandated by the court or the agency to attend case conferences or team meetings without the foster child, child care is an **allowable** expenditure under title IV-E foster care maintenance because this activity is beyond the scope of ordinary parental duties;

c. school conferences/ET (Pupil Evaluation Team): this activity is an ordinary parental duty and the cost of child care to provide for the foster parent's attendance at such is **not an allowable** expenditure under title IV-E foster care maintenance; or,

d. foster parent training: foster parent training required by the State agency is an activity beyond the scope of ordinary parental duties. Therefore, the cost of child care to provide for the foster parent's attendance at mandatory foster parent training is an **allowable** expenditure under title IV-E foster care maintenance.
(4) Foster parent visits with a child who is temporarily out of the home, e.g. child hospitalized or at camp: this is an ordinary parental duty. Child care provided to facilitate such is **not an allowable** expenditure under title IV-E foster care maintenance.

(5) Enhancement of a foster child's social skills/ peer relationships/socialization: child care that serves to enhance a child's social skills is typically a social service and/or recreational activity and, as such, is not reimbursable under title IV-E foster care maintenance. However, when recreational activities clearly substitute for otherwise necessary daily supervision, e.g., child care during the foster parent's working hours, they are allowable expenditures under title IV-E foster care maintenance.

(6) Special needs of a foster child best met in a day care setting: therapeutic child care is a social service and is **not an allowable** expenditure under title IV-E foster care maintenance.
Child care services for children in foster care must be rendered by a provider that is licensed, certified, or has some other formal status under State or local regulations in order for the State to claim reimbursement under title IV-E. This interpretation is consistent with the statute at section 472(c) which requires States to make placements in licensed or approved foster family homes and/or child care institutions. Since foster parents must be licensed or approved, child care providers that provide a foster child daily supervision in the foster parent’s stead must also be licensed or approved in order for the State to claim reimbursement under title IV-E foster care maintenance. Informal, episodic child care need not have such status and is presumably included in the basic title IV-E foster care maintenance payment.
For which of the following purpose(s) may transportation services be claimed for reimbursement as a foster care maintenance payment:

(1) the foster parent's involvement in/attendance at administrative case/judicial reviews, case conferences/team meetings, school conferences, and foster parent training;

(2) the travel of a child in foster care to/from the following activities:
   (a) allowable day care,
   (b) school attendance and extracurricular activities,
   (c) pre-placement visits,
   (d) foster family trips,
   (e) sports and cultural events,
   (f) administrative case/judicial reviews,
   (g) visitation at other locations, e.g., in the child welfare office, or, (h) visitation with siblings, other relatives, or other caretakers?
Local travel associated with providing the items listed in the first sentence of section 475 (4)(A) of the Social Security Act (the Act): food; clothing; shelter; daily supervision; school supplies; and a child's personal incidentals is an allowable expenditure for title IV-E foster care reimbursement.

The cost of local transportation associated with the items listed at section 475(4)(A) is presumably included in the basic title IV-E foster care maintenance payment. Transportation as a separate item of expense is not allowable except for reasonable travel to the child's home for visitation and for the child to remain in the school in which the child is enrolled at the time of placement. The items enumerated in the question were assessed based on these criteria.
(1) a. The foster parent's involvement in/attendance at administrative case/judicial reviews, case conferences/team meetings, and foster parent training: these items do not coincide with the definition at section 475 (4)(A). Therefore, transportation associated with them is not an allowable title IV-E foster care maintenance expenditure. However, section 474 (a) of the Act states that each State shall be entitled to a payment "... for the proper and efficient administration of the State plan...." **Transportation to provide for a foster parent's attendance at administrative case/judicial reviews and mandatory case conferences/team meetings is an allowable title IV-E administrative expenditure** because these activities provide for the proper and efficient administration of the title IV-E State plan. Additionally, section 474(3)(B) of the Act states that each State shall be entitled to Federal financial participation for "... expenditures (including travel and per diem expenses) as are for the short-term training of current or prospective foster or adoptive parents..." **Transportation and per diem to provide for foster parent's attendance at mandatory foster parent training is an allowable title IV-E training expenditure.**
b. The cost of a foster parent traveling to attend school conferences in the school in which the child was enrolled at the time of placement would be an allowable foster care maintenance expenditure because section (475(4) of the Act includes the cost of reasonable travel for the child to remain in that school.
CWPM 8.3B.1Q4, cont’d

(2) The travel of a child in foster care to/from the following activities:

a. allowable day care: transportation as a separate item of expense is not allowable except for reasonable travel to the child’s home for visitation. However, the costs of transporting a child in foster care to and from child care that substitutes for daily supervision are allowable and presumed to be included in the basic foster care maintenance payment;

b. school attendance and extracurricular activities: Section 475(4) of the Act includes the cost of reasonable travel for the child to remain in the school in which the child is enrolled at the time of placement in foster care as allowable as a title IV-E foster care maintenance expenditure. Additionally, other transportation associated with the child’s attendance at his/her school of origin is an allowable administrative cost under title IV-E because such transportation is related to case management and therefore necessary for the proper and efficient administration of the title IV-E State plan (see Child Welfare Policy Manual section 8.1B and 45 CFR 1356.60(c)(2)). The cost of transportation to and from extracurricular activities that substitute for daily supervision is also allowable and presumed to be included in the basic title IV-E foster care maintenance payment;
c. pre-placement visits: this activity does not fall under the definition at section 475(4)(A). Therefore, transportation to and from pre-placement visits is not an allowable foster care maintenance expenditure. However, regulations at 45 CFR 1356.60(c)(2) list "placement of the child" as an example of an allowable administrative cost;

d. foster family trips: transportation for foster family trips is not an allowable expenditure under title IV-E because these trips do not coincide with the items described at section 475(4)(A) of the Act. Transportation as a separate item of expense is not allowable except for reasonable travel to the child's home for visitation;
e. sports and cultural events: the reimbursement of recreation costs per se is not permitted under title IV-E. Since section 475(4) includes "a child's personal incidentals" the reasonable and occasional cost of such items as tickets or other admission fees for sporting, entertainment or cultural events are reimbursable under title IV-E Foster Care as a part of the maintenance payment. Transportation to and from these events is presumed to be included in the basic foster care maintenance payment;

f. administrative case/judicial reviews: transportation costs associated with the child's attendance at administrative case/judicial reviews are not allowable expenditures under title IV-E foster care maintenance because these activities do not coincide with the items described at section 475(4)(A). However, transportation costs associated with the child's attendance at administrative case/judicial reviews are allowable administrative costs under title IV-E because they provide for the proper and efficient administration of the title IV-E State plan;
g. visitation at other locations, e.g., in the child welfare office: the statute provides for "reasonable travel to a child's home for visitation," however, in many circumstances, it is not possible or appropriate for visitation to occur at the child's home. Therefore, reasonable transportation costs for visits at locations other than the child's home, e.g., at the child welfare office or other location deemed appropriate by the agency, are allowable as separate expenditures under title IV-E foster care maintenance. Transportation costs for visitation are only reimbursable for the child and not for the costs of a biological parent or other relative visiting with the child. States may use title XX or title IV-B funds for that purpose; or

h. visitation with siblings, other relatives, or other caretakers: since section 475(4)(A) does not specify with whom visits must occur, reasonable travel for visits with siblings, relatives, or other caretakers is an allowable separate title IV-E foster care maintenance expenditure. Again, transportation costs for visitation are only reimbursable for the child and not for the costs of a relative visiting with the child. States may use title XX or title IV-B funds for that purpose.
In some States, foster parents provide "respite" for a short period of time for a child in foster care who is placed with another foster parent. May the State claim title IV-E foster care maintenance payments for the child who goes temporarily to stay with another foster parent for respite purposes?

Answer
Yes. A State may claim allowable title IV-E foster care maintenance payments on behalf of a child who is title IV-E eligible and is placed with a licensed foster care provider only temporarily, as a respite placement. The foster parent is not being paid to provide respite care, rather the allowable costs of an eligible child are continuing to be paid. Title IV-E foster care maintenance payments may be claimed because the child is eligible and with a licensed provider. However, foster care maintenance payments may not be made to both providers for the same period in this situation.
In our State, we pay four different rates for foster care maintenance. A basic rate to all foster parents covers food, clothing, shelter, and personal incidentals. In addition, there are three levels of supplements which are paid to foster parents who care for children with varying degrees of physical or emotional handicaps. The higher rates in these cases relate to the increased supervision required for children with special needs and are considered a part of the foster care maintenance payment. Are these supplemental payments to foster parents allowable for reimbursement under title IV-E foster care as a maintenance cost?

**Answer**

Yes. These costs are allowable for Federal financial participation under the title IV-E foster care program. Certain categories of children, including those with physical or emotional disabilities, may require more day-to-day supervision and attention than those without such conditions. Although Congress did not intend that salaries be paid under title IV-E to foster parents for ordinary parental duties, "daily supervision" is one of the items included in the definition of "foster care maintenance payments" in section 475(4) of the Social Security Act. A supplement to the basic maintenance payment for a particular child is justified when the child has greater than usual needs for the items included in the definition, as determined by the State agency.
Identification of Costs - CPA

Is it an allowable maintenance cost?

• Basic board payment directly made to foster parents
• Enhanced board payment for increased supervision made directly to foster parents
• Clothing or personal incidentals paid separately
• Child care so that foster parent can work (as part of board rate or directly to licensed child care provider) or for duties that are outside of a normal parent
• Transportation as a separate payment if for reasonable travel to the child's home for visitation and for the child to remain in the school in which the child is enrolled at the time of placement (including school conferences at such schools)
Identification of Costs - CPA

*If not, is it an allowable administrative cost?*

• Foster home recruitment, licensing, training, support (if not a social service)

• Referral to services; Preparation for and participation in judicial determinations; Placement of the child; Development of the case plan; Case reviews; Case management and supervision;

• Some transportation described in CWPM 8.3b.1Q4

  *If not, assume it is unallowable for Title IV-E*

• Recreation except as specifically authorized

• Social services (i.e. counseling, BHOS, mental health assessments)

• Medical services

• Educational services
Child Welfare Policy Manual (CWPM) – Training
What costs can the title IV-E agency claim for Federal financial participation (FFP) to train title IV-E agency employees, foster parents, adoptive parents, relative guardians, employees of private child placing and child care agencies, and the other individuals listed in section 474(a)(3)(B) of the Social Security Act (the Act)?

..the short-term training of current or prospective foster or adoptive parents or relative guardians, the members of the staff of State or Tribal-licensed or approved child care institutions providing care to foster and adopted children receiving assistance under this part... in ways that increase the ability to provide support and assistance to foster and adopted children*

Beginning October 1, 2008, section 474(a)(3)(B) of the Act was expanded to authorize FFP for the short-term training of additional trainees. The additional trainees are: ... licensed or approved child welfare agencies providing services to children receiving assistance under title IV-E in ways that increase their ability to provide support and assistance to title IV-E eligible children.
Costs matchable as training expenditures at 75% FFP under this provision may include:

(1) salaries, fringe benefits, travel, per diem, tuition, books and registration fees for title IV-E agency trainees in allowable short-term or long-term training (regardless of the duration of the training) for the time period the employee is actually participating in training;

(2) salaries, fringe benefits, travel and per diem for staff development personnel assigned to training functions to the extent time is spent performing such functions;

(3) salaries, fringe benefits, travel and per diem for experts outside the agency engaged to develop or conduct training programs;

(4) travel, per diem, tuition, books and registration fees for foster parents and other persons identified under section 474(a)(3)(B) of the Act in short-term training; and

(5) costs of space, postage, training supplies, and purchase or development of training material.
Template - CCA
What is purpose of template?

To identify costs in a way that makes it clear what portion of rates paid to providers is chargeable to which fund sources, specifically Title IV-E Maintenance, so that when CBC’s enter costs in FSFN, they are appropriately recorded.
What if a provider does not provide clinical services at all?

Template should still be completed for documentation if audited.

CBC may also consider contract language indicating costs that are being funded
What if a CBC pays for clinical services for some but not all children?

Template should facilitate this by duplicating for each rate.
What if a provider charges different rates to different CBC’s?

Template will need to be completed for each rate using same budget figures – please contact Barney Ray for specific guidance on this.
What if a provider charges enhanced rate for increased supervision or single room?

Charges for single rooms should be included in the CBC rate agreement or contract, but an additional template is not required if they are some portion of the template rate (e.g. double rate for single room)

Charges for increased supervision do not need new template, but need documentation of the types and amount of costs above those on the template that are being incurred (e.g. increased supervision)
Template - CPA
Why do CPA’s need to complete template?

Primarily to document separation of rate between maintenance and ”administration” (recruitment, licensing, retention of homes)

Also, for those CPA’s that provide clinical services not funded by Medicaid (and funded by CBC), to separate out clinical costs as well
**Title IV-E Maintenance Budget Template**

**Child Caring Institutions**

Please complete 1 template per facility

| Facility name | # of licensed beds: | 10 |

<table>
<thead>
<tr>
<th>Personnel costs</th>
<th>TOTAL</th>
<th>IV-E Maintenance</th>
<th>IV-E Administration</th>
<th>Non-IV-E Social Services</th>
<th>Non-IV-E Medical</th>
<th>Non-IV-E Education</th>
</tr>
</thead>
<tbody>
<tr>
<td>Daily supervision</td>
<td>$200,000</td>
<td>$200,000</td>
<td></td>
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<td></td>
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<tr>
<td>Food prep</td>
<td>$25,000</td>
<td>$25,000</td>
<td></td>
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<tr>
<td>Transportation</td>
<td>$10,000</td>
<td>$10,000</td>
<td></td>
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<tr>
<td>Facility management</td>
<td>$15,000</td>
<td>$15,000</td>
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<tr>
<td>Behavior management or clinical not providing direct supervision</td>
<td>$35,000</td>
<td>$35,000</td>
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</tr>
<tr>
<td>Medical</td>
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<td></td>
<td></td>
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<tr>
<td>Educational</td>
<td>$5,000</td>
<td></td>
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</tr>
<tr>
<td>Other</td>
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<td>$40,000</td>
<td>$5,000</td>
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</table>

| Direct costs | |
| Food | $50,000 | $50,000 |
| Clothing | $10,000 | $10,000 |
| Child specific supplies including school, personal incidentals | $7,500 | $7,500 |
| Other - describe | |

| Facility | |
| Rent, depreciation, insurance, utilities, maintenance, repair, equipment, etc. | $75,000 | $75,000 |
| Vehicle maintenance including lease, maintenance, repairs, insurance, fuel, etc. | $3,000 | $3,000 |
| Other - describe | |

| Operational | |
| Office space and communication (including cell phones) | $6,000 | $5,000 | $1,000 |
| Office supplies & equipment | $3,000 | $2,500 | $500 |
| Staff travel | $1,250 | $1,000 | $250 |
| Other staff-related (background screens, recruitment) | $2,400 | $2,200 | $200 |
| Other - describe | |

| Indirect / General & Administrative Costs | |
| Total costs | $513,150 | $446,200 | $41,950 | $20,000 | $5,000 |
| Funded by other sources | $41,950 | | | | |
| Net cost to CBC | $471,200 | $446,200 | | | |
| Expected occupancy | 85% | | | | |
| Calculated daily rate to CBC | $151.88 | $143.82 | $6.45 | $1.61 |

| To be completed by CBC | |
| Negotiated rate | $150.00 | $143.82 | $6.18 | |
| % charged by fund source | 95.9% | 0.0% | 4.1% | 0.0% |

Personnel costs always include either employees or contracted staff, wages, overtime, taxes, benefits and all supervision.
<table>
<thead>
<tr>
<th></th>
<th>Total</th>
<th>IV-E Maintenance</th>
<th>IV-E Administration</th>
<th>Non-IV-E Social Services</th>
<th>Non-IV-E Medical</th>
<th>Non-IV-E Education</th>
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<td>Personnel costs</td>
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<td>$ 150,000</td>
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<td>Operational costs</td>
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<td>Board costs</td>
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<tr>
<td>Total costs</td>
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<td>$ 441,500</td>
<td>$ 200,000</td>
<td>$ 66,000</td>
<td>$</td>
<td>$</td>
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</tbody>
</table>

Funded by other sources $ 25,000

Net cost to CBC $ 682,500

Calculated daily rate to CBC 73.33

To be completed by CBC

Negotiated rate $ 70.00

% charged by fund source 67.8% 30.7% 1.5% 0.0% 0.0%

Personnel costs always include either employees or contracted staff, wages, overtime, taxes, benefits and all supervision.
Wrap UP

Please send additional questions to

hqw.cfo.cbc.me.accountability@myflfamilies.com