



FAMILY FIRST PREVENTION SERVICES ACT
(FFPSA) - PART IV

Chief Probation Officers of California (CPOC) Conference
June 2019

FFPSA Overview

- Part of Bipartisan Budget Act of 2018 (P.L. 115-123), signed February 9, 2018, comprised of eight Parts. Most significant include:
 - *Part I - New preventive service options*
 - *Part IV - Requirements for non-foster family home placement settings*
- Other parts amend existing provisions within Title IV-B and IV-E of the Social Security Act and reauthorizes existing programs through 2021
- Effective dates – Range beginning retroactive to February 9, 2018 and extending to October 1, 2027
 - *Part I – 10/1/2019 yet depends on Part IV implementation date*
 - *Part IV – 10/1/2019 through 10/1/2021*

FFPSA Provisions:

Part I:

- *Optional Prevention Services*
- *50%FFP for Kinship Navigator Programs (EBP& trauma-informed)*
- *Licensed Family-Based Substance Use Treatment Facilities*

Part II:

- *Extension of family reunification services from 12 to 15 months*
- *Regional Partnership Grants*
- *National Electronic Interstate Compact Enterprise (NEICE)*

Part III:

- *Model licensing standards for relative foster family homes*
- *Additional reporting requirements to prevent Child Abuse and Neglect Fatalities*

Part IV:

- *Limitations & New Requirements on Congregate Care*
- *Criminal Background and Child Abuse Registry Check*
- *Protocols to Address Inappropriate Diagnoses*

Part V

- *John H. Chafee Foster Care Program for Successful Transition to Adulthood*

Part VI:

- *IV-B & IV-E Reauthorizations through 2021*

Part VII:

- *Documentation of steps taken to address developmental needs of children under 5 years of age*
- *Data Exchange Standards*

Part VIII:

- *Delay of Adoption Assistance De-Link*

Part IV/Section 50741 & 50742: Placement Settings & Additional Requirements

- Limitations on IV-E Foster Care Maintenance Payments:
 - *Payments are limited to two weeks, unless specified setting as follows:*
 - Specialized setting providing prenatal, post-partum, or parenting supports for youth
 - Supervised Independent Living Programs for youth 18+
 - High-quality residential care and supportive services to youth who are or who are at-risk of becoming, sex trafficking victims (CSEC)
 - Licensed Residential Family based treatment Facility for Substance Abuse (optional within Part I)
 - Qualified Residential Treatment Program (QRTP)

Part IV. QRTP Requirements

Facility Requirements:

- Serve children w/ serious emotional or behavioral disorders or disturbances
- Operate trauma-informed treatment model & organizational structure
- Registered or licensed nursing staff and other licensed clinical staff that:
 - *Provide care within the scope of their practice as determined by State law;*
 - *Are on-site, according to the treatment model*
 - *Are available 24/7*

Part IV. QRTP Requirements

- Facilitates outreach and participation of family members in child's treatment plan
- Provides discharge planning and family-based aftercare supports for at least 6 months post-discharge
- Accredited by CARF, JCAHO, CoA, other approved accrediting organization

Part IV. QRTP Requirements

- Assessment & Documentation
 - 30 day assessment by a Qualified Individual to determine the appropriate level of care
 - Qualified individual is a trained professional or licensed clinician not an employee of the state and who is not connected to/affiliated with the placement setting
 - Family and Permanency Team
 - Within 60 days of the start of each placement, the court shall determine appropriateness of placement

Part IV Sub-Workgroup Discussions

- Waiting on wavier process from Feds concerning requirements for Qualified Individual
- Who might meet requirements for Qualified Individual (IPC or individual person)
- How does IPC process work in counties?
- Definition of “behavioral disorders or disturbances” for admission criteria
- Language for possible statute change concerning 60-day hearing process

Future Sub-Workgroup Discussions

- Nursing requirements
- 6 month aftercare
- Federal CFT standards

General Resources

- Family First Prevention Services Act (P.L. 115-123):

<https://www.congress.gov/bill/115th-congress/house-bill/1892/text>

- ACF Guidance & Comment Requests:

- *ACYF-CB-IM-18-02 (FFPSA Summary)*
- *ACYF-CB-IM-18-03 (CAPTA)*
- *ACYF-CB-IM-18-04 (PSSF & ICPC/NEICE)*
- *ACYF-CB-PI-18-05 (Chafee & Kinship Navigator Program)*
- *ACYF-CB-PI-18-06 (IV-B- Child Welfare Services & PSSF; Chafee; CAPTA State Grant)*
- *ACYF-CB-PI-18-07 (Effective dates & Delays)*
- *ACF-ACYF Letter to the CW Community (10/1/2018, Compilation of Guidance)*

General Resources

- ACF Comment Requests:

- *Proposed Model Family Foster Home Licensing Standards (8/1/2018)*

<https://www.federalregister.gov/documents/2018/08/01/2018-16380/notice-for-proposed-model-family-foster-home-licensing-standards>

- *Comment Request on EBP Clearinghouse (6/22/2018)*

<https://www.federalregister.gov/documents/2018/08/01/2018-16380/notice-for-proposed-model-family-foster-home-licensing-standards>



QUESTIONS?