

Are you ready to implement the Family First Prevention Services Act?



On **February 9, 2018**, Congress included in the final spending bill the Family First Prevention Services Act (Family First) to restructure how the federal government funds child welfare programs.

How will this bill affect my child welfare agency?

Family First includes significant changes to the existing Title IV-E federal reimbursement program, including:

- ✓ Increased funding for prevention services including mental health treatment, substance abuse treatment, and in-home skill-based programming for parents.
- ✓ Implementation of new requirements for congregate care placements that will limit federal funding.
- ✓ Increased federal funding for Kinship Navigator Programs.
- ✓ Expanded Title IV-E funding for children whose parents are in a family-based treatment facility.
- ✓ Guidance on family foster home licensing through the federal Department of Health and Human Services (HHS) model licensing standards (currently in development).
- ✓ Modified Adoption Assistance eligibility under the Applicable Children rule by raising the age requirement back to 2 years old as of January 1, 2018.




Other noteworthy aspects of this legislation include:

- ✓ Increased funding for Interstate Compact on the Placement of Children (ICPC) electronic case processing systems.
- ✓ Availability of Regional Partnership Grants targeting the well-being and permanency of children and families affected by the heroin and opioid epidemic.
- ✓ Expanded requirements for the Title IV-E State Plan to address prevention of child fatalities.
- ✓ Changes to the Chafee foster care independence program including expanding age ranges for specific services, allowing unused funds to be rolled over to the next year, and adding more specific reporting requirements.
- ✓ Planned development by HHS of data exchange standards and specifications.

More detailed analysis of the new legislation can be found here www.publicconsultinggroup.com

There's a lot to do. Where should I start?


Now that Family First is law, the federal Administration for Children and Families (ACF) will start preparing new regulations and programmatic guidance. In the meantime, your agency can begin gathering information about how ready your agency is to implement the forthcoming policy changes:

-  What is your agency's current array of prevention service offerings that fall under mental health treatment, substance abuse prevention, and/or in-home parenting skills?
 - » Which services might qualify as promising, supported, or well-supported?
 - » How is your agency funding these services?
 - » How does your agency identify families who need these services?
-  To what extent do your current residential/congregate care services meet Family First's standards?
 - » Which QRTP standards are the most serious "gaps" for your providers?
 - » How many children in congregate care settings have an assessment that indicates a residential placement is necessary?
-  What provision(s) of Family First are causing the most anxiety for your agency's workers, providers, and leaders?

These are big questions, and PCG's team can help you start working through them.

What do we do next?

Once ACF releases program guidance, PCG can help your agency prepare to implement Family First's requirements through:

-  Programmatic planning
 - » Assess the service and provider mix necessary to meet the needs of children and families in your jurisdiction
 - » Amend the Title IV-E state plan

-  Procurement planning & provider management
 - » Revise procurement documents to reflect new services and standards
 - » Work with providers to address changes necessary to comply with QRTP and standards
 - » Develop program monitoring protocols
 - » Manage documentation requirements
-  Cost/revenue analysis
 - » Review what funding sources currently pay for these placement settings
 - » Estimate costs to expand prevention services and comply with QRTP standards
 - » Estimate revenue impact of implementing changes
-  Assessment of optimal effective dates
 - » Assess fiscal and programmatic factors that affect whether your agency applies for a delay of the effective date for the congregate care and prevention services provisions
-  Business process review
 - » Assessment of existing and new processes required under Family First provisions
 - » Modify eligibility and claiming procedures
-  Information technology system impacts
 - » Identify functionality in Non-CCWIS or CCWIS systems to be added or updated
 - » Prepare business requirements, testing and training for new functionality
 - » Evaluate impact of data exchanges and reporting requirements for interoperable systems

Let's chat!



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Contact us and we'll call you to arrange a meeting to further discuss your specific Family First concerns, questions, and next steps.