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Family First Prevention Services Act

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OVERVIEW

- **Family First Prevention Services Act Background**
- **Candidacy**
- **Service Array**
- **Qualified Residential Treatment Program**
- **Prevention Services and Programs Five-Year Plan**
- **Georgia SHINES**
- **Other Provisions**
- **Court and Legal Considerations**

FAMILY FIRST PREVENTION SERVICES ACT

Background

- On February 9, 2018, President Trump signed the Family First Prevention Services Act (FFPSA).
- It is aimed at preventing the unnecessary placement of children into foster care and ensuring children are placed in the most appropriate, family-like setting when foster care is necessary.

CANDIDACY

1. Criteria needs to be established
2. New case plan requirements
3. New documentation requirements
4. State subject to auditing for failed documentation, such as not documenting services and referrals needed

CANDIDACY & SERVICE ARRAY CONSIDERATIONS

- An automated system that identifies IV-E determination for candidacy and reduces audit risk
- Capacity across the state to have providers who use evidence-based models
- Capacity across the state for family-centered residential substance abuse treatment
- Plan for monitoring fidelity to the model
- Determination of outcomes achieved

PROGRAM AND PRACTICE IMPACT

Increased numbers of family foster homes will need to be recruited, trained and evaluated

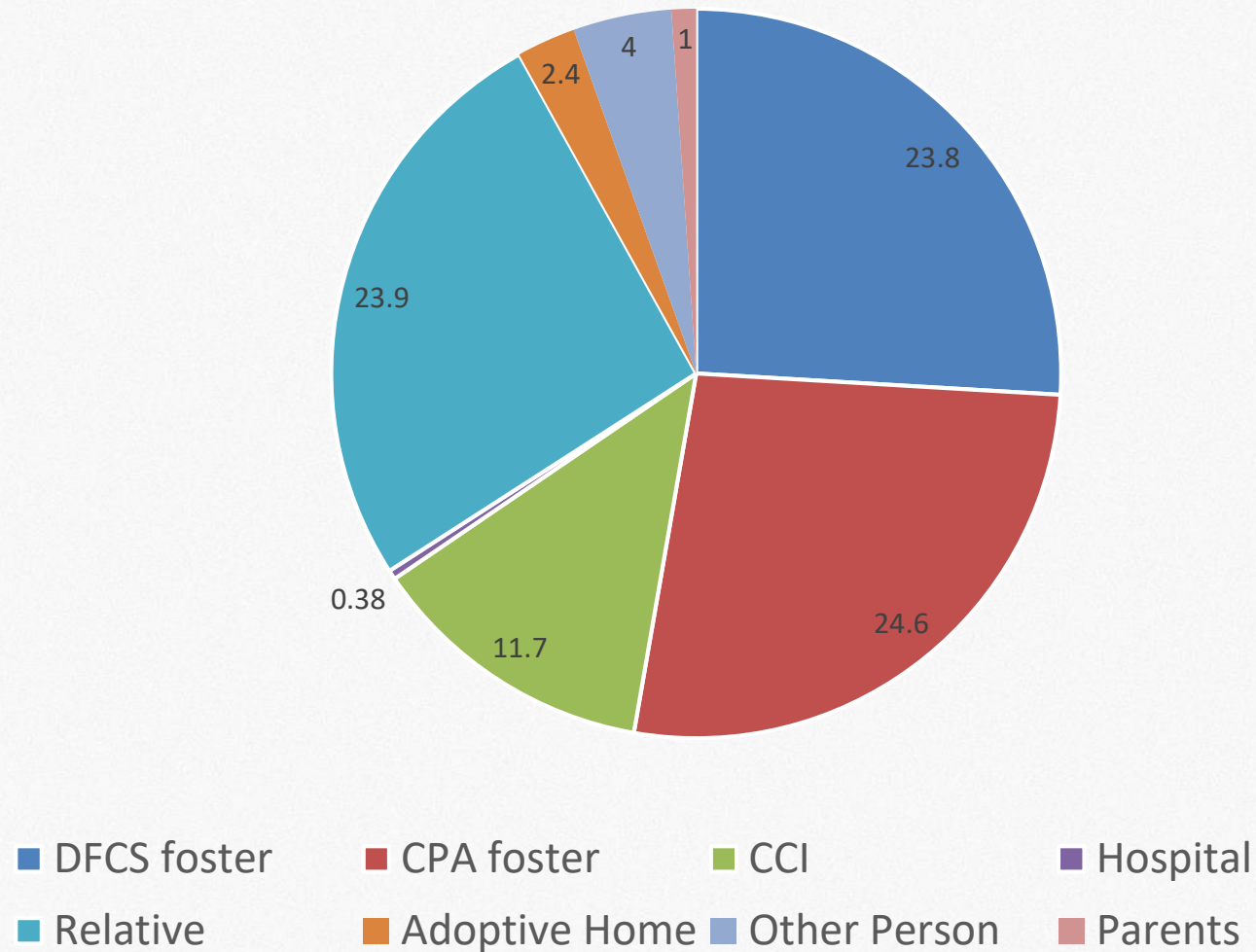
- Foster family home is a home where a licensed foster parent resides with six or fewer foster children (some flexibility)
- Administration for Children and Families (ACF) to identify model licensing standards by late fall 2018
- States will have to report by April 1, 2019 whether their licensing meet the new standards

FINANCIAL IMPACT

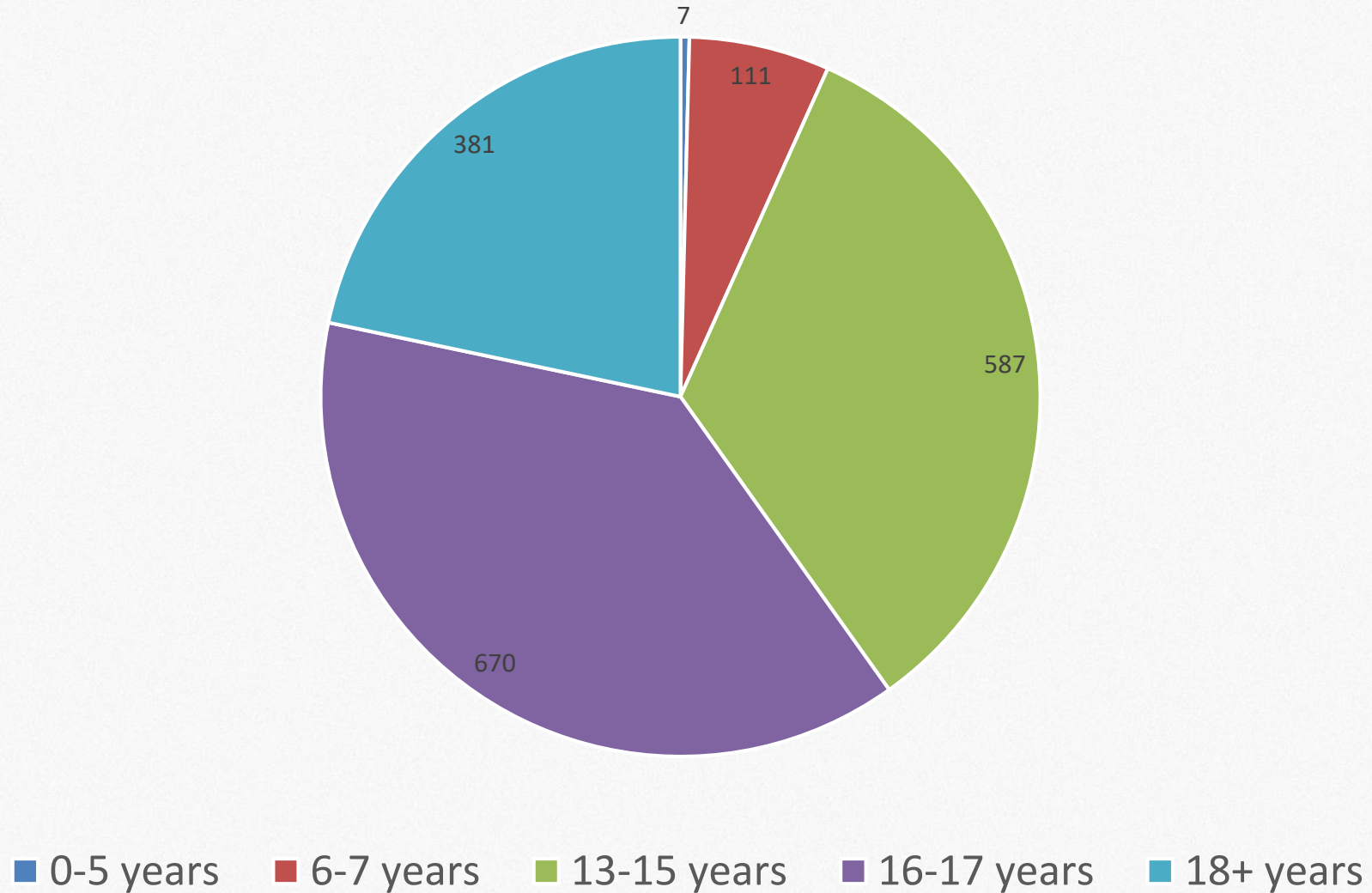
No more Title IV-E payments for children placed in a child-caring institution for longer than two weeks per child, unless the child is placed in one of the following settings:

- A Qualified Residential Treatment Program
- A setting specializing in prenatal, post-partum, or parenting supports for youth
- A supervised setting for youth ages 18 and older who are living independently
- A setting providing high-quality residential care and supportive services for sex-trafficking victims or those at risk of becoming a victim

MAJOR PLACEMENT TYPE PERCENTAGES



CONGREGATE CARE BY AGE



DHS IV-E FOSTER CARE REVENUE

SFY 2015	\$77.3 million
SFY 2016	\$83.9 million
SFY 2017	\$86.5 million
SFY 2018	\$93.9 million
SFY 2019	\$97.7 million

QUALIFIED RESIDENTIAL TREATMENT PLACEMENT (QRTP)

QRTP criteria:

- Licensed and accredited
- Use a trauma-informed treatment model
- Facilitate and document family involvement and outreach, and how sibling connections are maintained
- Provide at least six months post-discharge, family-based aftercare
- Have registered or licensed nursing staff and other licensed clinical staff (on-site consistent with the treatment model, and available 24/7)

PROGRAM AND PRACTICE IMPACT

- Group homes must meet the QRTP standards (if they are being paid for with Title IV-E funding)
- Partner with provider community to build capacity in the placement options funded under the Act

PLACEMENT AND TREATMENT CONSIDERATIONS

- Detailed information on QRTPs and service programs will not be available until later this fall.
- Significant additional foster home resources will be needed, particularly to serve current congregate care and specialized populations.
- Analysis will be needed to determine the number and availability of providers qualified to complete assessments within 30 days.

PLACEMENT IN A QRTP

- A qualified individual must assess the child within 30 days of placement.
- If the assessment is not completed timely, IV-E funds cannot be claimed for the entire placement.
- Within 60 days of the start of each placement, there must be a court review.

PROGRAM AND PRACTICE IMPACT

- Development of capacity within the provider community to assess the youths' suitability for placement in a QRTP
- Identification or creation of an appropriate assessment tool
- Establishment of a process and persons to oversee quality of care and lengths of stay in QRTPs
- Enhancement of contractual process to ensure contracts reflect new requirements and outcomes

PROGRAM AND PRACTICE IMPACT

- Partner with provider community to build capacity to serve “candidate” children and families
- Build capacity within the Division to maintain specialized prevention caseloads and prevention staff as required
- Integration of the Act’s case-management and service provision requirements with the current practice model
- Develop and implement a Kinship Navigator Program using “well supported,” “promising” and “supported” evidence-based models

PROGRAM AND PRACTICE IMPACT

- Increase data collection and reporting requirements to track outcomes, including families and youth receiving services
- Increase monitoring by the Division to ensure evidence-based practices are utilized and placement options selected meet the Title IV-E criteria
- Establishment of a program-evaluation component to monitor program fidelity to Administration for Children and Families criteria and achievement of outcome objectives

PREVENTION SERVICES & PROGRAMS FIVE-YEAR PLAN

- Target population:
 - How the state will assess children and their parents or kin caregivers to determine eligibility for services or programs
 - How providing services and programs is expected to improve specific outcomes
 - How the state will monitor and oversee the safety of children who receive services and programs

PREVENTION SERVICES & PROGRAMS FIVE-YEAR PLAN (cont.)

- The specific practices the state plans to use and how the services or programs were selected
- How the state plans to implement the services or programs, monitor to ensure fidelity, determine outcomes achieved
- How quality assurance review will be used to refine and improve practices

PREVENTION SERVICES & PROGRAMS FIVE-YEAR PLAN (cont.)

- How each service or program provided will be evaluated
- How the state will support and enhance a competent, skilled, and professional child-welfare workforce to deliver trauma-informed and evidence-based services
- How the agency will train and support caseworkers

PREVENTION SERVICES & PROGRAMS FIVE-YEAR PLAN (cont.)

- How caseload size and type for prevention caseworkers will be determined, managed and overseen
- Assurance that the state will report to HHS data on the provision of services and programs

OPPORTUNITY

Creation of a therapeutic placement for children with profound behavioral challenges

- To expand the continuum of care
- To have an intermediate “step down” after in-patient treatment

TECHNOLOGY IMPACTS

Technology updates (modernization) of the state's child welfare information system is necessary to implement effective solutions to support FFPSA:

- Increase system capacity to support federal/state mandates
- Increase access via mobility initiative
- Increase automated functionality
- Increase integration with other state applications
- Increase capacity of an application that supports ALL aspects of Georgia's child welfare programs, including payments to providers

GEORGIA SHINES

System changes are predicated on:

- Clearly defined practice guidance and policy
- Agency's strategy for implementation – development of implementation plan
- Funding to support/facilitate system enhancements
- Allowance of thorough gap analysis – current state vs. future state

Dependencies include, but not limited to:

- Definition of candidate for foster care – specifically how the state will identify this population, minimum criteria
- Definition of QRTP – identification of new licensure standards
- Documentation requirements for case planning (Family Preservation and Foster Care)
- IV-E requirements for reimbursement

GEORGIA SHINES (cont.)

Identified system enhancements include:

- Modify system to identify new population - candidate for foster care; establish criteria for “candidate” children at imminent risk of removal
- Modify system to support IV-E reimbursements for in-home services
- Modify system to support IV-E reimbursements for QRTPs
- Modify system to support new licensing requirements for QRTPs
- Modify system to enhanced licensing standards for family foster homes

GEORGIA SHINES (cont.)

Identified system enhancements include:

- Modify system to support all other business process changes to support the Act, (i.e. family engagement, prevention plan, discharge plan, post foster care services)
- Potential changes to Adoption Assistance eligibility
- Modify system to support additional documentation, including assessments
- Develop predictive analytics capability to assist in assuring accuracy in the selection of “candidates for foster care”

GEORGIA SHINES (cont.)

Identified system enhancements include:

- Modify system to support additional reporting requirements, including new data fields
- Modify system to improve financial processing to support accuracy of IV-E determination
- Modify system to allow for the inclusion of services provided to “candidate” children
- Develop new interface with NEICE for children placed in, or from other states

COURT AND LEGAL CONSIDERATIONS

- A primary legal barrier to permanency is the availability and staffing of the courts for timely hearings. The Act requires additional hearings and/or rulings for QRTP placement approval.
 - Potentially, additional court hearings to determine “candidates for foster care”
 - Additional SAAG support is required to meet the demands under the Act

OTHER PROVISIONS

- Must give assurances that state will not increase the Department of Juvenile Justice's population
- Must work to inform judiciary of changes and requirements for Family First
- Must report on steps to compile complete and accurate information on maltreatment deaths
- 500 new residential substance abuse treatment beds



Thank You

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