



Colorado Department of Human Services

Family First Prevention Services Act

Family First Prevention Services Act

Full bill H.R. 1892 available
at [congress.gov](https://www.congress.gov)

Focus on funding structure
under which the majority of
federal funding is only
available once children are
removed from their home

Consensus about the need for
upfront services to
strengthen families

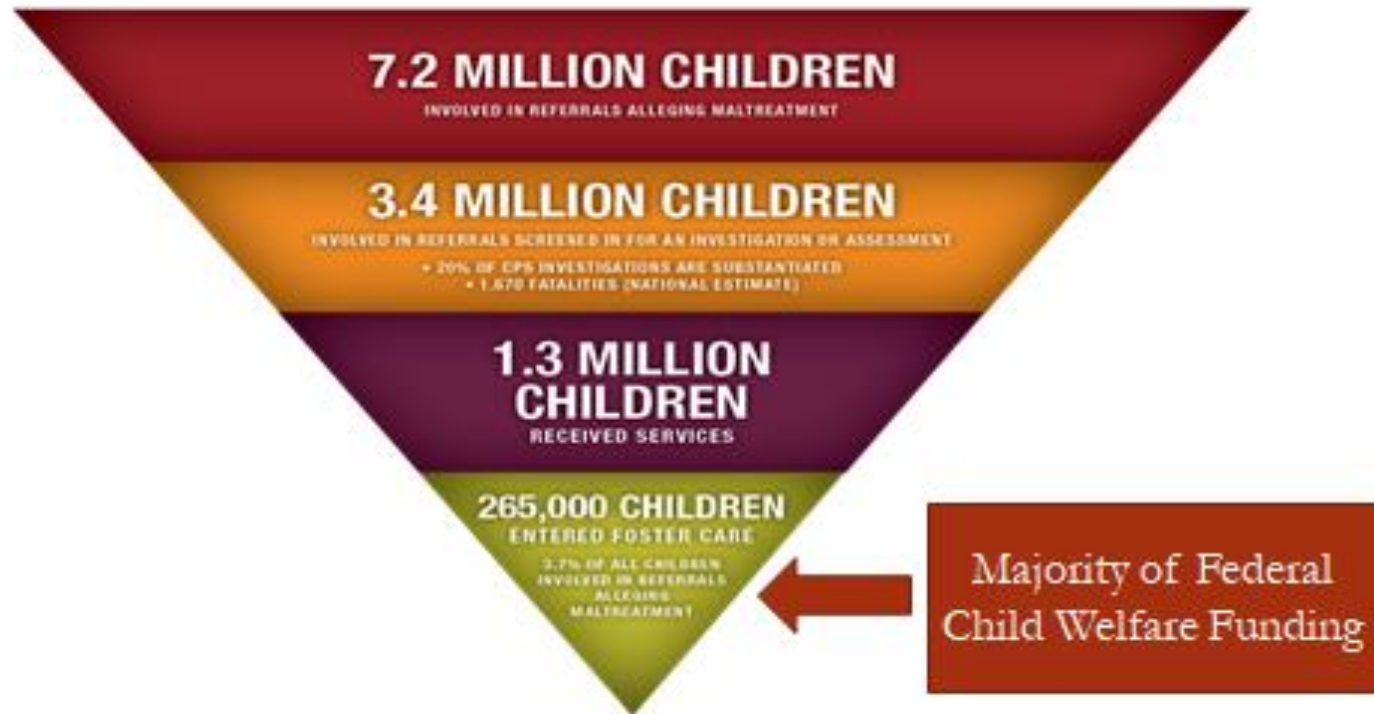


Theoretical orientation and historical tensions





Child Maltreatment Report 2015



Big Opportunities for Child Welfare

Pre-2018 federal law

Most federal \$\$ for foster care

Services only for child

Income test to qualify at risk family needs

No dedicated kinship navigator or funding for kinship navigators

No \$\$ for child placed with parent in residential placements

Family First

New federal \$\$ for prevention

Prevention for parents, kin and child

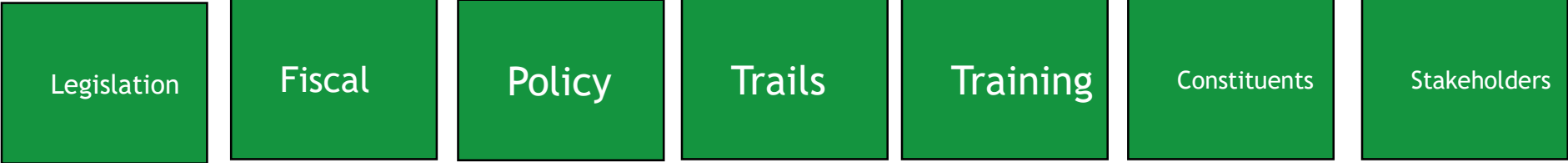
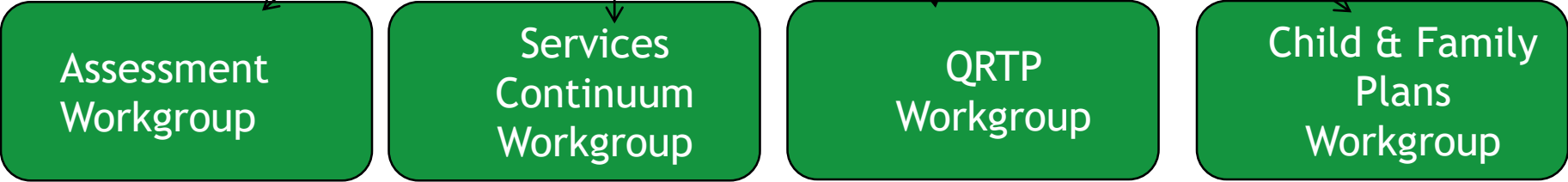
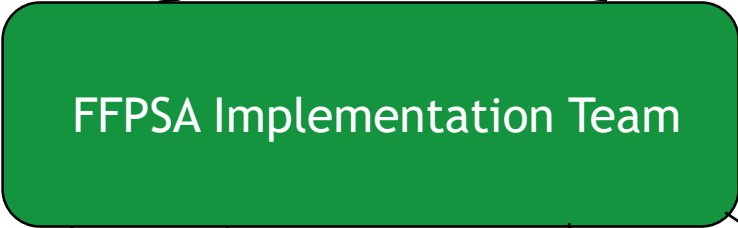
NO income test

NEW 50% reimbursement

12-months of federal \$\$ for such

The “Why” Behind FFPSA

- Significant changes in how Child Welfare is funded and what is incentivized
- Preserving families - “family” first
- Systemically addressing substance use/opioid issues
- Getting incentives right - opening up Federal Title IV-E for placement prevention services
- Paying for what works/evaluate programs to make sure they're effective
- Children and youth in foster care have the right to be placed in the “least restrictive” setting relative to their needs.
- When a child/youth cannot be safely placed in a family-like setting, there should be appropriate treatment options available



Family First Prevention Services Act

Title I: Placement Prevention Services

Title II: Ensuring Appropriate Placement

Colorado FFPSA response

Focus on Need for Vulnerable Families

Goals of Reform Efforts:

- 1) Preserving Families - keeping families together with focus on prevention services
- 2) Systemically addressing substance use/opioids - major reason kids come into foster care is parental substance abuse
- 3) Getting incentives right - prevention services that are thoughtful and evidence based.
- 4) Paying for what works - evaluate programs to make sure they're effective



FFPSA Title I Placement Prevention Services

FFPSA Prevention Services and Programs

States have the option to use federal child welfare dollars for up to 12 months of services and programs to prevent children from entering foster care by supporting children, kinship caregivers and parents

Eligible children:

- “Candidates” for foster care when at serious risk of entering or reentering foster care and who are able to remain safely in the home with provision of evidence based mental health, substance use disorder, or in-home parenting services for the child, parent or kin caregiver. To be eligible for Title IV-E Prevention Services, the child’s candidate status must be designated in the child’s prevention plan
- A child may be at serious risk of entering foster care based on circumstances and characteristics of the family as a whole or circumstances of individual parents or children that may affect the parent’s ability to safely care for and nurture their children.

State Prevention Plan Requirements

States plans using Title IV-E funds for prevention must develop a prevention services and programs oversight plan that:

- Conducts periodic risk assessments;
- Describes the prevention services and programs, and whether they are promising, supported, or well-supported, as well as intended outcomes;
- Explains state's evaluation process for each prevention service or program offered;
- Monitors the prevention services and programs, and refines its approach from lessons learned;
- Provides training to carry out Title IV-E prevention services and supports.

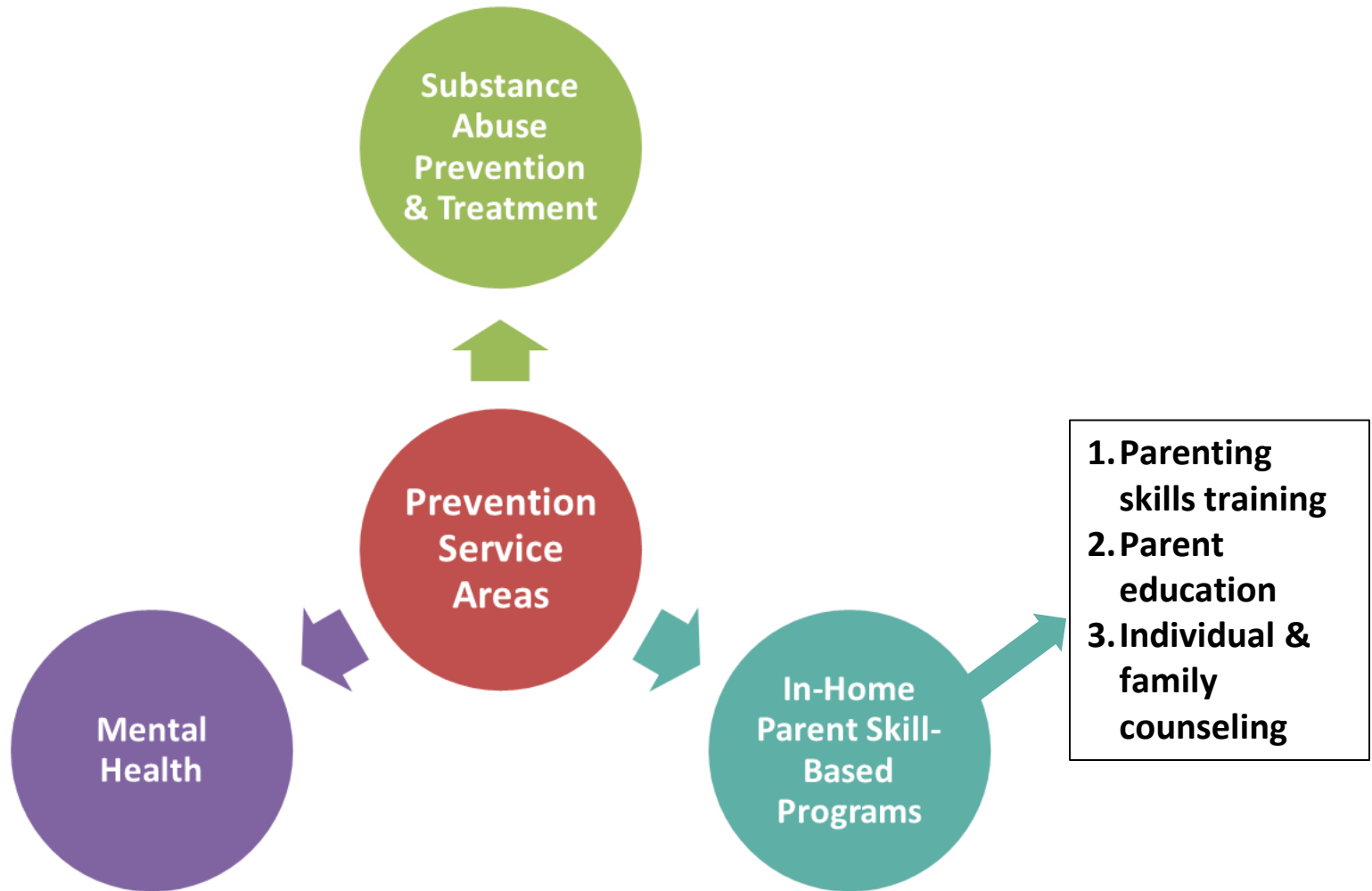
States must update their plan every 5 years, and must be approved by HHS.

Prevention Federal Reimbursement

Federal Contributions:

- States can be reimbursed for 50% of costs of prevention services and programs
- Out of the federal reimbursement funds for prevention, 50% must be used for well-supported practices
- States can only be reimbursed for these programs if they have a well-designed and rigorous evaluation strategy

Prevention Services



Service Requirements

To be eligible for federal reimbursement, services provided under Title I must:

- Be trauma-informed, as defined in the law
- Be practices that are evidence based-promising, supported, or well-supported as each is defined in the law
- Be specifically listed and described in detail in a new prevention program component of the state plan
- Be individually subjected to a well-designed and rigorous evaluation as part of the state plan unless the requirement is waived by the Secretary



FFPSA Title II Ensuring Appropriate Placements

FFPSA Title II: Ensuring Appropriate Placements

- Creates a new placement type a Qualified Residential Treatment Program (QRTP)
- Defines who QRTPs may serve and the types of services that they must offer to children and youth in care
- Places specific requirements on the use of QRTPs for purposes of federal reimbursement
- Sets forth requirements on when and how children are to be assessed for placement in QRTPs, and who may do it

HB 19 1308

https://leg.colorado.gov/sites/default/files/2019a_1308_signed.pdf

CONCERNING FOSTER CARE PREVENTION SERVICES TO ALIGN CURRENT STANDARDS WITH THE FEDERAL "FAMILY FIRST PREVENTION SERVICES ACT".

This was put together for enabling language for Colorado to start the work on Families First.

Definitions were added but may be updated

QRTPs Defined

A QRTP is a licensed, certified and accredited program that:

- Has a trauma-informed treatment model: A treatment model in which all parties involved recognize and respond to the impact of traumatic stress on those who have contact with the system. Programs with such a system infused and sustain trauma awareness, knowledge, and skills into their cultures, practices and policies.
- Has registered or licensed nursing staff and other licensed clinical staff who meet requirements of treatment model
- Facilitates participation of family in the child's treatment, to the extent appropriate and in the child's best interests
- Facilitates outreach to family members, including siblings
- Provides discharge planning and family based aftercare support for at least 6 months post discharge

QRTPs continued...

Assessment, Documentation & Judicial Determination Requirements for Placement in a QRPT:

- An assessment of the child/youth must occur within 30 days of placement by a “Qualified Individual” to:
- Assess the needs of the child/youth to determine if needs can be met with family members or in family foster home or if the QRPT level of care is appropriate. If QRPT deemed not appropriate - federal funding ends. Assessment =CANS (Child and Adolescent Needs and Services
- Within 60 days of placement in QRTP the Court must determine and approve the placement as providing the most effective level of care
- States must certify that policies or practices will not result in a significant increase to the Division of Youth Services population

New Standards for Non-Family Placements

Limitation on federal financial participation for placements that are not in foster family homes

Following 14 days for which foster care maintenance payments are made on behalf of a child/youth placed in a child-care institution, no Federal payment may be made for amounts expended for foster care maintenance payments on behalf of the child/youth unless:

The child/youth is placed in a child-care institution that is:

- A qualified residential treatment program
- A setting specializing for prenatal, postpartum, or parenting supports for youth
- For youth who are 18 years of age, a supervised independent living setting
- A setting providing high-quality residential care and supportive services to children/youth who have been found to be, or are at risk of becoming, sex trafficking victims
- Placed in a licensed residential family-based treatment facility

FFPSA Collaboration

- Focus on cross system communication and collaboration
- Access to care and concerns about reliance on deep-end services and out-of-home placements
- Targeted investment in prevention and early intervention services (SB1308 gave authority to pursue placement prevention services)
- SB254 gave the balance of state county's access to the cash fund to add prevention services
- Supports for adoption of evidence-based services

Recommendations

Ongoing cross-system collaboration, intersections and alignment that builds on work that has already occurred. Collaboration and partnership opportunities include but aren't limited to:

- OBH: Roadmap to Children's Behavioral Health, COACT, CMHTA
- OEC: Child maltreatment prevention programs and activities
- CDPHE: Child Maltreatment Prevention Framework
- HCPF: Medicaid/RAEs
- CO State Government: Juvenile Justice
- CO Department of Education
- Civic Canopy
- CO Works (Temporary Assistance for Needy Families (TANF))
- Courts and State Judicial

Colorado Implementation Plan

- Statutory Changes: May 2020
 - Including but not limited to: Title 19, 24, 25.5 and Title 26
 - ✓ Child Care Licensing Act
 - ✓ Child Welfare Services - funding & reimbursement
 - ✓ Family Preservation - placement prevention services
- Administrative Rule Changes: June 2020
 - ✓ Core Services
 - ✓ Collaborative Management Program
 - ✓ Program Area 3
- Training: Winter 2020
- Other:
 - ✓ Analyze rules to align with FFPSA
 - ✓ Evaluation & selection/implementation of an statewide assessment tool for QRTP

Colorado Implementation Plan

- January 2020 State Plan is due that includes what evidence based prevention programs Colorado will be providing and where
- Implementation workgroups
 - ✓ QRTP - draft rules
 - ✓ Service Continuum
 - ✓ FFPSA Child and Family Plans - placement prevention services and QRTP
- Assessment Tool: CANS - Child and Adolescent Needs and Strengths
- Assessment of EBP in Colorado
- Judicial Webinar

<https://www.colorado.gov/pacific/cdhs-boards-committees-collaboration/family-first-prevention-services-act-implementation-team>

Family First Prevention Services Act

Full bill H.R. 1892 available at
[congress.gov](https://www.congress.gov/bills/115/1892)

