

Child Welfare Policy Manual

Questions & Answers

8.6C.1 Allowable administrative and training costs

1. Question: ACYF-CB-PI-18-09 provides guidance on claiming child-specific title IV-E prevention administrative costs if services are provided for a specified period. Would this include prevention services claimed under a non-title IV-E program, such as Medicaid?

Answer: Yes, if a child has a title IV-E prevention plan in accordance with section 471(e)(4)(A) of the Act and the prevention services listed in that plan are being provided, the state may claim child-specific title IV-E administrative costs under the title IV-E prevention program.

- **Source/Date:** 09/18/2019
- **Legal and Related References:** Social Security Act - section 471(e)(4)(A)

2. Question: May a title IV-E agency claim title IV-E administration for the costs of conducting a well-designed and rigorous evaluation of title IV-E prevention service under section 471(e)(5)(C)(i) of the Act?

Answer: Yes. Conducting an evaluation under section 471(e)(5)(C)(i) of the Act is a requirement of the title IV-E prevention plan. Therefore, the costs of conducting that evaluation are allowable title IV-E administrative costs because it is necessary for the proper and efficient administration of the title IV-E prevention plan (section 474(a)(6)(B)(i) of the Act). Any such costs must be properly cost allocated to benefitting programs through an approved cost allocation plan.

- **Source/Date:** 10/23/2019
- **Legal and Related References:** Social Security Act - sections 471(e)(5)(C)(i) and 474(a)(6)(B)(i)

3. Question: Are title IV-E administrative costs available under section 474(a)(6)(B)(i) of the Act for the cost of conducting an independent systematic review in order to complete the checklist for transitional payments?

Answer: Yes, if the state claims such costs pursuant to an approved five-year title IV-E prevention plan. Conducting an independent systematic review of the evidence of a prevention service or program for the purpose of completing the Checklist for Program or Service Designation for HHS Consideration and claiming transitional payments under the title

IV-E prevention program is "necessary for the proper and efficient administration" of the title IV-E prevention plan (section 474(a)(6)(B)(i) of the Act). Consistent with 45 CFR 1356.20(c)(8) and ACYF-CB-PI-18-09, a state may claim allowable title IV-E administrative costs beginning the first day of the fiscal quarter in which the state submits an approvable five-year prevention plan (but not prior to October 1, 2019). Any such costs must be allocated through an approved cost allocation plan. However, since the completion of an independent systematic review is a prerequisite solely for purposes of obtaining approval to claim title IV-E prevention Federal Financial Participation (FFP) for transitional payments, the title IV-E prevention program is the only benefitting program for the purposes of cost allocation. This means there is no need to allocate these costs to any other programs that may fund such a prevention service or program.

- **Source/Date:** 11/05/2019
- **Legal and Related References:** Social Security Act - section 474(a)(6)(B)(i), 45 CFR 1356.20(c)(8)

4. Question: What are the allowable administrative costs under the title IV-E prevention program?

Answer: Costs for the proper and efficient administration of the title IV-E prevention program are reimbursable at 50 percent federal financial participation (section 474(a)(6)(B)(i) of the Act). Some examples include activities to develop necessary processes and procedures to establish and implement the provision of prevention services for eligible individuals, policy development, program management, continuous quality improvement, data collection and reporting, and conducting an evaluation under section 471(e)(5)(C)(i) of the Act. Processes to establish the provision of prevention services could include outreach efforts to encourage program participants by providing information and identifying any questions or concerns on available services.

The state may also claim for child-specific allowable activities that comport with or are closely related to one of the listed activities at 45 CFR 1356.60(c)(2), such as:

- the development and maintenance of the child's prevention plan as defined in section 471(e)(4)(A) of the Act;
- verification and documentation of program eligibility;
- referral to services;
- outreach to provide information, coordinate services and connect families with resources;
- case planning activities including needs assessments;
- child-care to facilitate a parent or kin caretaker participation in provision of prevention services;

- case management activities, including activities to increase access, utilization, and participation in title IV-E prevention services or programs such as:

- o coordinate services, provide transportation escorts and transportation to services and related appointments (e.g., bus passes, rideshares, gas gift cards, and agency or community partner-provided transportation); family engagement activities, such as phone calls to encourage and remind the family of service appointments, and

- o peer navigation programs provided as part of case management to support participation in a title IV-E prevention program or service.

A title IV-E agency may claim child-specific administrative costs even when a title IV-E prevention service is paid for from another source (e.g., Medicaid), if the child has a title IV-E prevention plan in accordance with section 471(e)(4)(A) of the Act and the prevention services listed in that plan are being provided.

Child specific administrative costs may be claimed for allowable activities from the beginning of the month in which the child is identified in a prevention plan until the end of the 12th month, if services were provided for the entire 12-month period, or if the services are provided for less than the entire 12-month period, the end of the month the child's title IV-E prevention services ended. Any such costs must be allocated through an approved cost allocation plan or methodology.

- **Source/Date:** 7/30/2024
- **Legal and Related References:** Social Security Act- sections 471(e)(4)(A) and (5)(C) (i), 474(a)(6)(B)(i) and (ii); 45 CFR 1356.60(c)(2); and ACYF-CB-PI-24-07