



Implementation Brief #1: Family First Prevention Services (FFPS) Program

Requirements, Roles, & Responsibilities for Candidacy Determination, Safety Monitoring, Family Well-Being Planning, and Needs Assessment

Overview

As county agencies and their respective community-based partners develop services, protocols, and procedures for the Family First Prevention Services (FFPS) Program, there are various requirements of program administration based on federal and state policy that should be considered. This Implementation Brief serves as guidance to Title IV-E County Agencies (Child Welfare and Probation) and community-based providers delivering services under the FFPS Program to provide clarity to the requirements, roles, and responsibilities of each agency. Additionally, this Brief provides best practice guidance and prompts for continuing discussions within local Comprehensive Prevention Planning (CPP) Teams to further identify roles and responsibilities as it fits within varying county contexts, processes, and service provision.

How to Use this Implementation Brief

As California continues to strive to achieve excellence in promoting community, family, and child well-being by going far upstream to ensure there is “no wrong door” of entry to services and supports, this Brief should be utilized alongside the Community Pathway Framework to ensure that areas of program requirements included in this resource truly achieves a vision for well-being. Those counties and community providers delivering prevention services as part of the FFPS Program can utilize this Brief in the following ways:



Community Providers

- ❑ Prompt discussions with CPP Leads (Child Welfare or Probation) to further define roles and responsibilities within their respective county.
- ❑ Engage the community and those with lived expertise to receive feedback on how best to implement the requirements in this resource.
- ❑ Utilize the following information to identify the specific requirements in different areas of the FFPS Program.
- ❑ Determine how to develop messaging to families seeking services on such requirements that is transparent, clear from jargon, and that facilitates engagement.
- ❑ Begin establishing internal processes and procedures for providing services to families, ensuring there are seamless opportunities to access services and supports.
- ❑ For counties implementing Community Pathways, utilize the information in this resource to identify the areas of service delivery in which the following requirements will be achieved within community pathway processes.

County Agencies

- ❑ Prompt and facilitate discussions among CPP Teams (those required and suggested partners per [All County Letter \(ACL\) 22-23](#)) to discuss how the following requirements can be achieved and be adapted within county processes.
- ❑ Engage community providers providing services under the FFPS Program, the community, and individuals with lived expertise to identify what is needed for providing services and supports that embed the requirements included in this resource, while being culturally responsive and prioritizing equity and disproportionality.
- ❑ Develop contracting approaches, including responsibilities of providers, based on the different areas of roles within program requirements.
- ❑ Establish internal procedures and protocols for the following requirements under the FFPS Program while incorporating equitable approaches that seek to keep families intact to thrive, whenever possible.
- ❑ Identify county-specific training requirements for staff and partners delivering services and supports under the FFPS Program.

FFPS Program Requirements

The FFPS Program includes both federal and state requirements when administering the program to claim for federal Title IV-E reimbursement and/or State Block Grant funds. The following requirements include four (4) key areas of the FFPS Program: 1) Candidacy Determination; 2) Safety Monitoring; 3) Case Planning; and 4) Needs Assessment. These federal vs. state requirements and their associated statute and/or guidance, as applicable, are included below and in the following page.

NOTE: Counties have the discretion of developing their own processes with the following requirements, unless otherwise noted below. The FFPS Program will also require documentation in the California Automated Response & Engagement System (CARES) for both pathways (Title IV-E Pathway and Community Pathway) and future guidance on these documentation requirements will be issued.

CANDIDACY DETERMINATION

Requirements by Pathway to Prevention Services		References
TITLE IV-E PATHWAY	COMMUNITY PATHWAY	
<p>A county may elect to provide the prevention services to the following by providing a written plan to the State Department of Social Services, in accordance with instructions issued by the department.</p> <ul style="list-style-type: none"> ❖ A child who is a candidate for foster care. ❖ A child or nonminor dependent in foster care who is a pregnant or parenting foster youth. ❖ The parents or kin caregivers of a child described in this paragraph. 	<p>A Title IV-E Agency may contract with another agency or community-based organization (CBO) to perform the activities described in WIC §16587(d)(4)-(8) in accordance with guidelines and instructions issued by the department. The county shall be responsible for supervising and ensuring appropriate performance of these activities.</p>	<p>FEDERAL LAW Public Law 115-123, Sec. 471(b)(13)</p> <p>STATE LAW WIC § 16587(a), (c), & (e)</p> <p>CA PREVENTION PLAN Page 24</p>
<p>When a county or tribal caseworker determines, based upon an assessment, that prevention services are necessary to mitigate the child's risk of entry or reentry into foster care, and the child meets the criteria for imminent risk of foster care established in state and federal law, a child can be determined as a candidate for prevention services under FFPSA.</p>	<p>When a provider, upon completion of an assessment, finds that a child may be at imminent risk for foster care, a request is made for a determination of candidacy by the Title IV-E agency (<i>Child Welfare, Probation, & Tribes with Title IV-E Agreements</i>).</p>	<p>FEDERAL LAW STATE LAW WIC §16586 (a)(2)</p> <p>CA PREVENTION PLAN Page 24</p>
<p>Once candidacy is determined, the family is eligible for 12 months. After the 12-month period, candidacy will have to be re-determined to continue providing another 12 months of prevention services.</p>		<p>STATE LAW WIC § 16587(c)(2)</p>
<p>There are a variety of potential categories, circumstances, and/or populations that may be eligible for prevention services based upon individual determination by a local IV-E agency, or a Tribe with a Title IV-E agreement with the State, to be at imminent risk for foster care but can remain safely at home as long as allowable mental health, substance use, and/or in-home parent skill-based program services are provided.</p> <p>Examples of imminent risk circumstances may include but are not limited to:</p> <ul style="list-style-type: none"> ❖ Any recent or current circumstance that may cause family instability or a threat to the child/youth's safety or well-being. ❖ Current/recent (within 6 months) family involvement with social services agency ❖ Change in family relationships characterized by frequent conflict or violence; ❖ Recent increase in substance use and/or mental health needs that impact daily functioning and ability to care for the child or youth; ❖ Recent incident in which a parent or guardian made a plausible threat to cause serious physical harm to a child or youth; ❖ Incarceration of the caregiver; and ❖ Child or youth participated in or associated with persons engaged in criminal activity <p>**Does not include a child or youth who is in foster care (with the exclusion of expectant and parenting youth who do not require a candidacy assessment nor determination for prevention services)</p> <p>There are additional age requirements that can be referenced on page 10 of federal guidance.</p>		<p>FEDERAL LAW ACYF-CB-PI-24-07</p> <p>STATE LAW WIC §16587(d)(1)</p> <p>CA PREVENTION PLAN Pages 20-24</p>

What is the difference between Safety Monitoring and Needs Assessment under the FFPS Program?



While there are similarities between these two areas, there is a clear distinction for the purposes of FFPS. The goal of Safety Monitoring is to identify and report any immediate safety concerns in the home. Counties may consider aligning this with mandated reporting protocols. “Needs Assessment” included in this brief is being used in place of “Periodic Risk Assessment” to demonstrate California’s approach to ensuring families are receiving the necessary services and supports while meeting state and federal requirements. In contrast to Safety Monitoring, the goal of the Needs Assessment is to assess how service interventions are impacting and resolving risks within the family. This will help identify if services are meeting the family needs and if the family still meets Candidacy requirements. Needs Assessment may also identify new prevention services or other supports that might help the family.



SAFETY MONITORING

Requirements by Pathway to Prevention Services		References
TITLE IV-E PATHWAY	COMMUNITY PATHWAY	
<p><u>For Child Welfare</u>¹: Structured Decision-Making (SDM) Tools are required within currently established processes.</p> <p><u>For Probation</u>²: Probation may use a variety of tools to conduct safety monitoring for entry into foster care. Example assessments can be found on Page 28 of the CA Prevention Plan.</p>	<p>In the Community-based Family Well-Being Plan, there are no prescribed safety monitoring tools and/or approaches required. Providers should, in consultation with their Title IV-E agency, identify and establish the methods that include safety monitoring protocols. This includes reviewing existing protocols and if they are adequate and, if not, establishing applicable protocols and requirements.</p>	<p>CA PREVENTION PLAN Page 27</p>
<p>Safety monitoring will be conducted in-person with the child/youth by the caseworker.</p>	<p>Safety monitoring will be conducted in-person with the child/youth by the provider.</p>	<p>STATE LAW WIC §16587(d)(7)</p>
<p>The State is required to identify in the Five-Year State Prevention Plan how safety will be overseen and monitored within the 12-month period of services.</p> <p>Information on child-specific assessments and re-examinations may include:</p> <ul style="list-style-type: none"> ❖ Information on the risk or safety assessment instruments or protocols ❖ Frequency of assessments ❖ Who will be responsible for monitoring child safety; AND ❖ The mechanisms in place by the Title IV-E agency to oversee the safety of children during the 12-month period. <p>Title IV-E agencies (<i>Child Welfare, Probation, & Tribes with Title IV-E Agreements</i>) are required to identify a process for monitoring child safety, including when services are provided by community providers or offered via the Community Pathway and must have language included in service contracts.</p>		<p>FEDERAL LAW Public Law 115-123, Sec. 471(5)(B)(ii)</p> <p>ACYF-CB-PI-24-07</p> <p>STATE LAW WIC §16587(d)(7)</p> <p>CA PREVENTION PLAN Page 43</p>

¹ This includes counties Family Maintenance cases, Expectant/Parenting youth in foster care, or counties with no Community Pathway.

² This includes Traditional Candidates that may receive prevention services.

FAMILY WELL-BEING PLANNING

Requirements by Pathway to Prevention Services		References
TITLE IV-E PATHWAY	COMMUNITY PATHWAY	
<p>A Title IV-E agency that elects to provide prevention services is responsible for overseeing all aspects of case planning, including those activities listed in WIC §16587 (d)(1)-(11).</p>	<p>A Title IV-E Agency may contract with another agency / community-based organization to perform activities described in WIC §16587(d)(4)-(8) in accordance with guidelines & instructions issued by CDSS. The county shall be responsible for supervising & ensuring appropriate performance of the activities.</p>	<p>STATE LAW WIC §16587(d)</p> <p>CA PREVENTION PLAN Page 24</p>
<p>Individual Family Well-Being Plans must:</p> <ul style="list-style-type: none"> ❖ Be in collaboration with the family (family voice must be present) ❖ Define goals within the Family Well-Being Plan ❖ Utilize the state-approved and/or developed model in CARES; ❖ Identify the prevention strategy; AND ❖ List the services provided <p>→ <u>For expectant and/or parenting youth</u>: the Plan must be included in the child/youth's Plan.</p> <p>→ <u>For an Indian child</u>: the Plan must be done in partnership with the child's Tribe.</p>	<p>Individual Family Well-Being Plans must:</p> <ul style="list-style-type: none"> ❖ Be in collaboration with the family (family voice must be present) ❖ Define goals within the Family Well-Being Plan ❖ Providers may select a case plan which meets state and federal requirements ❖ Identify the prevention strategy; AND ❖ List the services provided <p>→ <u>For an Indian child</u>: the Plan must be done in partnership with the child's Tribe.</p> <p>→ There must be clear and transparent strength-based conversations with families regarding the voluntary nature of the Family Well-Being Plan.</p>	<p>FEDERAL LAW Public Law 115-123, Sec. 471(e)(4)(A)</p> <p>STATE LAW WIC §16587</p>
<p>Services provided to or on behalf of a child must be trauma informed.</p> <p>Services provided must be in accordance with the promising, supported, or well-supported practices approved in the State Five-Year Prevention Plan (for claiming federal IV-E funding).</p>		<p>FEDERAL LAW Public Law 115-123, Sec. 471(e)(4)(B) & (C)</p>



NEEDS ASSESSMENT³

Requirements by Pathway to Prevention Services		References
TITLE IV-E PATHWAY	COMMUNITY PATHWAY	
<p><u>For Child Welfare</u>⁴: Structured Decision-Making (SDM) Tools are required within currently established processes.</p> <p><u>For Probation</u>⁵: Probation may use a variety of tools to conduct assessment for entry into foster care. Example assessments can be found on Page 28 of the CA Prevention Plan.</p>	<p>In the Community Pathway Family Well-Being Plan, there are no prescribed assessment tools and/or approaches required to assess progress, including any risks that require additional services. Such assessment can be conducted via each Evidence-Based Program's (EBP's) risk protocols.</p>	<p>CA PREVENTION PLAN Page 27-28</p>
<p>The State is required to identify in the Five-Year State Prevention Plan how assessment of progress, including risk to determine additional services, will be conducted and monitored within the 12-month period of services.</p> <p>Information on child-specific assessments and re-examinations may include:</p> <ul style="list-style-type: none"> ❖ Information on the risk or safety assessment instruments or protocols ❖ Frequency of assessments ❖ Who will be responsible for monitoring child safety; and ❖ Mechanisms in place by the IV-E agency to oversee the safety of children during the 12-month period. 		<p>FEDERAL LAW Public Law 115-123, Sec. 471(5)(B)(ii) ACYF-CB-PI-24-07</p>
<p>Ongoing assessments are required to ensure services are appropriate and that families' needs are identified ongoing and are being met.</p> <p>In the case of an Indian child, the assessments and any reexamination of the prevention plan shall be conducted in partnership with the Indian child's Tribe.</p>		<p>STATE LAW WIC §16587(d)(8)</p> <p>CA PREVENTION PLAN Page 31</p>




³ "Needs Assessment" included in this brief is being used in place of "Periodic Risk Assessment" to demonstrate California's approach to ensuring families are receiving the necessary services and supports while meeting state and federal requirements

⁴ This includes counties Family Maintenance cases, Expectant/Parenting youth in foster care, or counties with no Community Pathway.

⁵ This includes Traditional Candidates that may receive prevention services.




Community Provider Roles & Responsibilities

Community providers are an integral part of the FFPS Program and meeting both federal and state requirements. Community providers will have the role of overseeing Family Well-Being Plans after the approval of candidacy by the Title IV-E Agency. The following roles and responsibilities within the established FFPS Program requirements will be expected of community providers. County agencies and community providers should have further discussion of specific roles and responsibilities based on needs within the county.

FFPS Program Area	Role	Responsibilities
<p>Candidacy Determination</p> 	<p>When a family is seeking services directly via a community provider, the provider will conduct an assessment that identifies imminent risk (based on an approved process within the county) and make a recommendation to the Title IV-E Agency for approving candidacy of prevention services if there is risk of maltreatment.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Conduct an assessment and submit candidacy determination request to the Title IV-E agency via the CARES Provider Portal when the assessment indicates the child is at imminent risk for foster care entry. <input type="checkbox"/> Co-develop contract language with the IV-E agency that is clear on the responsibilities and process of candidacy determination, including a process for addressing candidacy in a variety of circumstances (e.g., care with no guardianship). <input type="checkbox"/> When the family identifies that they are member(s) of a Tribe, the provider must collaborate with the Tribe to participate in the family assessment, case planning, service delivery, and any safety and needs assessments.
<p>Safety Monitoring</p> 	<p>When a family is receiving services via a community provider, the role of the provider will be to identify safety concerns, provide any necessary referrals for services/supports, and refer to Child Welfare when there is a threat of safety to the child(ren).</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Develop safety plans (including the child's Tribe, when applicable) in circumstances where there are safety threats present while identifying the value and presence of existing natural supports and safety networks. <input type="checkbox"/> Follow mandated reporter protocols when there are immediate threats to child's safety. <input type="checkbox"/> Co-develop contract language with the IV-E agency that is clear and descriptive on the responsibilities of safety monitoring
<p>Family Well-Being Planning</p> 	<p>When a family is receiving services via the community provider, the provider will manage the Family Well-Being Plan with the family and report only the required de-identifying information via the CARES Provider Portal to ensure federal data collection requirements are met and that counties and the State can review data for continuous quality improvement (CQI) efforts. Community providers will be trauma-informed and ensure equitable access to services that include and go beyond the EBPs identified in the CA State Prevention Plan.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Co-develop the Family Well-Being Plan with the family and implement all parts of the Plan while utilizing the Plan as a comprehensive tool for ongoing safety monitoring, needs assessment, and for the provision of services. <input type="checkbox"/> Identify additional services and/or supports ongoing that would be beneficial for the family and update the plan to reflect new services/supports provided. <input type="checkbox"/> Submit required data via the CARES Provider Portal regarding service delivery. <input type="checkbox"/> Include the child's Tribe through all steps of the case planning process. <input type="checkbox"/> Leverage existing processes and protocols to develop Family Well-Being Plans.
<p>Needs Assessment</p>	<p>In the Community Pathway, providers will serve as the entity monitoring the needs of the family, and referring to additional services/supports, as needed or requested by the family. Community providers will also assess imminent risk during intake and make a recommendation to the Title IV-E Agency for candidacy approval.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Conduct ongoing assessment of needs and associated risks requiring additional services during the 12-month period of providing a Family Well-Being Plan, which can include processes already embedded within EBPs being administered. <input type="checkbox"/> Reassess risk (including the child's Tribe, when applicable) at the end of 12-month period and offer another 12 months if risk is still present.

Child Welfare & Probation Agency Roles & Responsibilities

County agencies, particularly the CPP Leads, are responsible for developing and administering the county's CPP, and are the main entity responsible for ensuring both federal and state requirements are met. The Title IV-E Agency will also take the role of approving candidacy, regardless of pathway (Community Pathway vs. Title IV-E Pathway). The following roles and responsibilities within the established FFPS Program requirements will be expected of county Title IV-E Agencies. County agencies and community providers should have further discussion of specific roles and responsibilities based on needs within the county.

FFPS Program Area	Role	Responsibilities
<p>Candidacy Determination</p> 	<p>The Title IV-E Agency will develop all parameters and criteria for candidacy determination within the county. The Title IV-E Agency will approve/deny all candidacy requests from community providers submitted via the CARES Provider Portal.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Develop county-specific criteria for assessing candidacy under the FFPS Program. <input type="checkbox"/> Co-develop approach with providers to provide ongoing services/supports for families after the 12-month period, who are not eligible for FFPS, or in cases where there is not an EBP to meet the needs of the family. <input type="checkbox"/> Conduct inquiry into the child's Indian status and coordinate services with the Tribe.
<p>Safety Monitoring</p> 	<p>Regardless of pathway to prevention services, the Title IV-E Agency will ensure that safety is being monitored and will intervene only when necessary. The Title IV-E Agency will also create a process and requirements for community providers regarding safety monitoring.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> When overseeing the plan, develop safety plans (including the child's Tribe, when applicable) with the family to ensure ongoing safety. <input type="checkbox"/> Respond to concerns of safety that arise that may be referred from community providers as part of mandated reporter protocols. <input type="checkbox"/> Co-develop processes and contract language with community providers (where appropriate) that identifies the provider's role with safety monitoring.
<p>Family Well-Being Planning</p> 	<p>When a Title IV-E Agency is overseeing the Plan (in cases of counties with no Community Pathway, CWS Family Maintenance cases, Probation Traditional Candidates, and Expectant/Parenting youth in foster care) the Agency will complete a Family Well-Being Plan with the family. The Agency will also provide requirements to community providers of what needs to be included within plans.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Co-develop with community input, an approach to Family Well-Being Plans for use under FFPS. <input type="checkbox"/> Develop requirements for Family Well-Being Plans and include such language within contracting to identify the provider's role within case planning. <input type="checkbox"/> Review de-identified data for CQI processes. <input type="checkbox"/> Include the child's Tribe through all steps of the case planning process. <input type="checkbox"/> Counties should work with providers to determine protocols for managing EBPs delivered by multiple community providers.
<p>Needs Assessment</p>	<p>When a Title IV-E Agency is overseeing the Plan (in cases of counties with no Community Pathway, CWS Family Maintenance cases, Probation Traditional Candidates, and Expectant/Parenting youth in foster care) the Agency will conduct ongoing assessment of needs and risks requiring additional services. The Agency will also create a process for community providers to conduct ongoing needs assessment.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Co-develop approaches to assessing needs, including risks requiring additional services, with providers and the community, when appropriate. <input type="checkbox"/> When overseeing the Plan (see role), conduct an assessment (including the child's Tribe, when applicable) using the county's process. <input type="checkbox"/> Develop language to include in contracting with community providers that identifies the provider's role with needs assessment.

What else should community providers know?



Community providers will be responsible for supporting the family when referred via the Community Pathway. It's important to note that not all counties will have a community pathway. In such circumstances, the community provider (contracted to provide an EBP to a family) and the Title IV-E Agency will need to identify specific responsibilities for overseeing the Family Well-Being Plan. For counties that have a Community Pathway, community providers should refer to the Community Pathway Framework to ensure their processes and protocols align with each step and activity of the Framework.

What else should Child Welfare and Probation agencies know?



There will be circumstances where the county does not have a community pathway or providers. The county will need to identify processes for providing services/supports in these instances, such as contracting for a specific EBP or providing services in-house. For counties that have a community pathway, roles and responsibilities should be clearly defined and in alignment with the Community Pathway Framework, CQI processes, and data collection/reporting requirements.

Prompts for Further Discussion

Implementing the FFPS Program will require continued engagement between community providers delivering services, CPP Leads, and the larger CPP Team. CPP Teams should consider the following questions when continuing to explore how to embed FFPS requirements into practice. This is not an exhaustive list, and CPP Teams should have further conversations that take their county-specific contexts into consideration.

- How can our county develop a common message to convey these requirements to families that creates transparency, cultivates trust, and promotes engagement?
- How can our county engage individuals with lived expertise, including Tribal Representatives, across all areas of the program to develop county-specific requirements and processes?
- How will our county transition non-court/voluntary Family Maintenance cases (Child Welfare) or Traditional Candidates (Probation) to be prevention-focused with a Family Well-Being Plan?
- What will prompt an expectant and/or parenting youth to receive a Family Well-Being Plan? Will we offer it to all expectant and/or parenting youth, or will they be automatically provided with a Family Well-Being Plan?
- What approach should our county create for assessing imminent risk? What assessments are our community-based providers currently utilizing that may assist in determining imminent risk? Would those assessments meet state and federal requirements for assessing candidacy for prevention services?
- How will needs assessment occur in our community pathway to assess the ongoing need for services and continued candidacy for the FFPS Program? Will we use the EBP protocols and/or tools that build in needs assessment, or would we like something more standardized?
- What success indicators within each of these areas of requirements and practices would our county like to develop? What would demonstrate successful implementation and compliance with requirements?
- How will our county manage EBPs being delivered to one family by multiple community providers (ex. Healthy Families America AND Functional Family Therapy)?

Contact Us

For questions pertaining to this Implementation Brief or other questions about the FFPS Program and associated requirements, please contact the California Department of Social Services (CDSS) Safety, Prevention, and Early Intervention Branch at ffpsapreventionservices@dss.ca.gov.

If your county is interested in receiving additional technical assistance and is not currently receiving support from a technical assistance provider, complete this [CPP Technical Assistance Request Form](#).