



## Family First Prevention Services Utilizing the State Block Grant

### Overview

In California's Family First Prevention Services (FFPS) Program, counties and Tribes can use State Block Grant (SBG) dollars to build and implement their FFPS-aligned prevention service continuum. The SBG was allocated to support counties and Tribes in developing prevention programs and enable counties to access federal Title IV-E prevention funds. SBG funds are intentionally flexible, allowing counties and Tribes to build a comprehensive prevention continuum beyond solely funding the Title IV-E eligible Evidence-Based Practices (EBPs)<sup>1</sup>. As a result, they can fund primary, secondary, and tertiary prevention activities, including those that may not yet qualify for federal reimbursement. This document serves as a resource for county Title IV-E agency staff to support clarification on allowable expenditures for SBG and supplantation vs. supplementing.

### Utilizing the State Block Grant

In alignment with state guidance, the following outlines allowable uses, examples, and conditions for utilizing SBG funds<sup>2</sup>. This is intended as a guide and is not an exhaustive list. If there are any questions about other potential expenditures, counties can contact the FFPSA Prevention Services inbox at [ffpsapreventionservices@dss.ca.gov](mailto:ffpsapreventionservices@dss.ca.gov).

#### *Allowable Uses*

1. **Prevention Services (Direct Service Delivery)**: Funds may support the delivery of the following prevention services:
  - a. A Title IV-E eligible EBP identified in the county Comprehensive Prevention Plan (CPP) delivered to families determined to be a candidate for prevention services
  - b. Any primary, secondary, or tertiary prevention service identified in the county CPP
2. **Non-Federal Match for Title IV-E Prevention Services**: Counties seeking to draw down Title IV-E eligible EBPs must provide a 50% non-federal share of the cost. SBG funds may be used to meet this cost-sharing requirement and access federal Title IV-E funding for prevention services.
3. **Administrative Activities**: Administrative expenditures necessary to develop and implement the FFPS prevention program are allowable. This includes:
  - a. Program administration and management
  - b. Fiscal administration and claiming
  - c. Data collection and reporting
  - d. Contract management and procurement
  - e. Program monitoring and evaluation

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<sup>1</sup> For a list of currently approved Title IV-E eligible Evidence-Based Practices (EBPs), refer to Appendix A: EBP Table within [California's Five-Year State Prevention Plan](#).

<sup>2</sup> [All County Letter 22-23](#) details the allowable activities for utilizing the State Block Grant (SBG) funds. The [State Block Grant Expenditure Chart](#) also provides specific activities and examples to reference.

4. Workforce Development and Training: SBG funds can support building the capacity of organizations and staff in implementing prevention services, including:
  - a. Training staff and providers on FFPS program requirements and EBPs
  - b. Implementation readiness activities
  - c. Technical assistance for counties and partners
  - d. Cost associated with renting spaces to provide training
  
5. Prevention Infrastructure, Planning, and Capacity Building: Counties may spend SBG funds on activities that build a comprehensive prevention service continuum, such as:
  - a. Readiness assessments
  - b. Cross-system collaboration efforts
  - c. Development of new prevention programs
  - d. Expansion of the service array
  - e. Community engagement and planning activities
  - f. Needs assessments
  - g. Evaluation and performance monitoring
  - h. Rent for co-located prevention services center

### *Examples of Uses*

Counties use SBG funds for a variety of purposes in alignment with those described above and their CPPs. In practice, counties commonly use the SBG for:

1. Contracting with prevention providers
2. Training and technical assistance
3. Paying the match for IV-E prevention services
4. Launching EBPs
5. Building prevention infrastructure and data systems

### *Key Limitations & Conditions*

Although SBG funds are flexible, there are certain non-allowable costs and conditions for using the funds. Other important limitations and conditions include:

1. Funds must support prevention services that reduce entry into foster care;
2. Counties must maintain previous spending levels for existing prevention spending (see Maintenance of Effort and Supplantation section below);
3. Spending must align with the county's approved Comprehensive Prevention Plan<sup>3</sup>; and
4. Funds must not be spent on any of the following:
  - a. Foster Care Maintenance Costs
  - b. Construction or Capital Projects
  - c. Supplanting (Replacing) Existing Funding
  - d. Non-Prevention Services

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<sup>3</sup> For counties seeking to modify their Comprehensive Prevention Plan and/or use funds beyond those activities described in their CPP, contact the California Department of Social Services (CDSS) Family First Prevention Services (FFPS) team at [ffpsapreventionservices@dss.ca.gov](mailto:ffpsapreventionservices@dss.ca.gov).



## Maintenance of Effort and Supplantation

### *Maintenance of Effort*

Under the Family First Prevention Services Act (FFPSA), states were required to establish a one-time Maintenance of Effort (MOE) baseline based on federal fiscal year 2014 spending for EBPs that met model fidelity and <sup>4</sup>were delivered in a trauma-informed manner. Costs for EBPs within this timeframe that were not delivered to fidelity of the model or in a trauma-informed manner were not calculated. The purpose of the MOE was to establish the level of non-Title IV-E spending on prevention services prior to FFPS implementation. To claim federal Title IV-E reimbursement for prevention services, total spending from counties and the State must be maintained at or above that baseline level of spending.

In California’s implementation of the FFPS program, the MOE is measured at the statewide level. This means the state must ensure that overall prevention spending does not fall below the established baseline. This approach provides counties flexibility to build or expand prevention services—even if they had limited prevention infrastructure historically—while still ensuring that new Title IV-E prevention funding increases overall prevention investment instead of replacing existing funding sources.

### *Supplanting*

Supplanting refers to the use of federal funds to replace (“or supplant”) existing state, local, or other funding, rather than adding to or expanding services. Title IV-E funding can be used to supplement existing programs so long as it involves expanding beyond what is already established and funded. This may include, but is not limited to, expanding the services provided and/or increasing the population being served. The county may draw down the Title IV-E funds to supplement the difference for these expanded services. Additionally, Title IV-E funding can also be applied when an existing funding changes program components that would make an existing funding source no longer eligible to be applied to the service/program.

#### Example of **SUPPLANTING (NOT allowable)**:

The county already funds Healthy Families America (HFA) via a contract with a community-based provider in the amount of \$125,000 annually utilizing federal Community-Based Child Abuse Prevention (CBCAP) funding. Once Title IV-E services become available for claiming, the Tribe uses the CBCAP funding for the 50% match and replaces the rest of their previous investment with Title IV-E funding.

#### Example of **SUPPLEMENTING (allowable)**:

The county child welfare agency already funds Parents as Teachers (PAT) for families receiving CalWORKs Welfare-to-Work via a contract with a community-based provider in the amount of \$100,000 annually utilizing the CalWORKs Home Visiting Program (HVP) funds. Once Title IV-E services become available for claiming, the county child welfare agency provides SBG funds to the provider to hire additional staff and expand PAT services to families who are not eligible for CalWORKs Welfare-to-Work (an eligibility requirement for CalWORKs HVP funds). SBG funds are used to meet the 50% cost-share requirement with federal Title IV-E funding for the new population served (families not participating in CalWORKs Welfare-to-Work and who are determined candidates for prevention services).

<sup>4</sup> For more information regarding Maintenance of Effort (MOE) requirements, refer to [County Fiscal Letter 20/21-96](#).

### *Summary*

The MOE and supplantation work together to ensure that new prevention funding increases overall investment in services, rather than simply shifting existing costs. The MOE establishes a baseline level of prevention spending based on historical expenditures prior to the FFPSA that must be maintained in order to receive federal or related state funds. The rule against supplanting complements the MOE requirement by preventing agencies from using new funds (i.e., Title IV-E prevention funding) to pay for services that were already supported with other funding sources. Together, these policies are intended to ensure that new prevention funding expands services, rather than allowing jurisdictions to reduce their own spending while relying on new funding streams.