

## Family First Prevention Services Program Fiscal Myth-Busting

**Overview:** This document provides common fiscal myths related to implementation of the FFPS Program alongside the correct facts that dispel these myths.

**Purpose:** This document is intended to support further engagement in Title IV-E prevention services and provide community-based providers and system partners with accurate information to make an informed decision for participating in the FFPS Program.

**Audience:** Title IV-E agencies<sup>1</sup> (child welfare and probation), Community-Based Organizations (CBOs), and system partners (e.g., behavioral health agencies, public health departments, county and local offices of education, etc.).

| FFPSA/IV-E Claiming                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| MYTH                                                                                                                                                                                                           | FACT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| If it's entered into CWS-CARES, it is automatically Title IV-E claimable.                                                                                                                                      | Data entry does not determine claiming eligibility; Title IV-E claiming depends on service type, eligibility determination, documentation, and allowable costs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p>All prevention activities are FFPSA claimable.</p> <p>Motivational Interviewing Cross-Cutting Case Management is automatically reimbursable.</p> <p>50% reimbursement means 50% of all prevention work.</p> | <p>Only Title IV-E allowable prevention services that meet eligibility and documentation requirements are claimable. In order to be reimbursed, an evidence-based practice must be included in the state and county Comprehensive Prevention Plan (CPP) and delivered to an individual who meets candidacy requirements, has a Family Well-Being Plan<sup>2</sup> in place and meets eligibility requirements for the EBP being provided. Title IV-E reimbursement applies to allowable reimbursable service and administrative costs, not all activities or total program costs. Additionally, Title IV-E reimbursement for prevention services requires a non-federal match. As a result, eligible prevention services are reimbursed at a 50% federal financial participation (FFP) rate, with the remaining 50% funded through the required non-federal share of costs. See references below for more information on these program requirements:</p> |

<sup>1</sup> Tribes with a California Title IV-E Agreement may have requirements or processes that differ from those described in this document.

<sup>2</sup> In the FFPS Community Pathway, other case plans may serve as the Family Well-Being Plan so long as all required data is included. Refer to the [FFPS Family Well-Being Plan Implementation Brief](#) for the requirements needed within FWBPs in the FFPS Community Pathway.

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|                                                                                                                                                         | <ul style="list-style-type: none"> <li>• <a href="#">FFPS Candidacy Determination &amp; Service Pathways Brief</a></li> <li>• <a href="#">FFPS Family Well-Being Plan Implementation Brief</a></li> </ul>                                                                                                                                                                             |
| Only the Title IV-E agency can provide the non-federal share of cost (i.e., match).                                                                     | <p>A non-Title IV-E public agency (such as a county department of mental health, a local school district, or a public health department) can leverage its own local/state dollars to draw down the 50% federal Title IV-E reimbursement through an interagency agreement with a Title IV-E entity.</p> <p><u>Reference:</u> <a href="#">Child Welfare Policy Manual Section 8</a></p> |
| CWS-CARES and CECRIS <sup>3</sup> must reconcile child-by-child.                                                                                        | <p>System reconciliation may occur at multiple levels, but child-by-child reconciliation is not required for FFPS.</p> <p><u>Reference:</u> Forthcoming CFL</p>                                                                                                                                                                                                                       |
| Probation Departments can only claim federal Title IV-E funds prevention for Traditional Reasonable Candidates, pursuant to <a href="#">ACL 14-36</a> . | Probation departments may claim federal Title IV-E prevention funds for identified prevention populations that may or may not include Traditional Reasonable Candidates.                                                                                                                                                                                                              |

| <b>Contracting and Rate-Setting Requirements<br/>(Procurement/Finance Structure)</b>                                             |                                                                                                                                                                                                                                                                                                        |
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| MYTH                                                                                                                             | FACT                                                                                                                                                                                                                                                                                                   |
| The state will establish standardized FFPSA service rates.                                                                       | Title IV-E agencies will develop rates with providers within federal/state guidelines, which may differ by Title IV-E agency, provider, and service.                                                                                                                                                   |
| Prevention services can only be contracted using fee-for-service contracts.                                                      | FFPSA allows multiple contracting structures, including bundled and cost-based arrangements. Contract guidelines and invoicing procedures will vary by Title IV-E agency in negotiation with providers.                                                                                                |
| CBOs and cross-system partners can only participate in FFPS if there is a monetary contract/exchange with the Title IV-E agency. | Participation in FFPS requires a fiscal and administrative arrangement to support claiming and accountability, but that does not always have to take the form of a contract. For example, system partners may participate through interagency agreements, Memorandum of Understandings (MOUs), or work |

<sup>3</sup> The County Expense Claim Reporting Information System (CECRIS) is the platform used by the county child welfare agency to report on the County Expense Claim (CEC) and CA 800 Summary Report of Assistance Expenditures (CA 800). This is the method of submitting claims for Title IV-E reimbursement.

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|  | orders that allocate costs and transfer funding within or across public agencies. |
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| Provider Eligibility/Participation Requirements                                                     |                                                                                                                                                                                                                                                                                                                 |
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| MYTH                                                                                                | FACT                                                                                                                                                                                                                                                                                                            |
| FFPS is only for clinical behavioral health providers.                                              | FFPS prevention services may be delivered by qualified providers, including CBOs. EBP providers must meet EBP purveyor requirements and FFPS fidelity requirements, and not all the EBPs included in the CA State Plan require clinician status. <a href="#">Read more about the EBPs in California's Plan.</a> |
| Providers must already be Medi-Cal certified to participate.                                        | Medi-Cal certification is not a universal requirement for FFPS participation.<br><br>Reference: <a href="#">ACL 25-12 &amp; BHIN 25-018</a>                                                                                                                                                                     |
| Providers must have an Electronic Medical Record (EMR) system to provide FFPS services.             | An EMR is not categorically required to be a service provider for FFPS. Title IV-E agencies will use typical procurement processes (including RFPs) to identify community partners who will provide FFPS services. The Title IV-E agency will identify parameters for contracting.                              |
| CBOs cannot provide formal prevention case management.<br><br>CBOs cannot participate meaningfully. | CBOs can provide case management and EBPs if they meet program, billing, and oversight requirements. CBOs are key FFPSA implementation and service delivery partners.                                                                                                                                           |
| Only large providers can meet FFPS requirements.                                                    | Provider size is not determinative; capacity, systems, and compliance infrastructure are what matter.                                                                                                                                                                                                           |
| Previous experience with EBPs is required.                                                          | Title IV-E agencies may elect to work with CBOs who are experienced delivering specific EBPs, or they may identify new CBOs and work collaboratively to build capacity to deliver specific EBPs in the county CPP.                                                                                              |
| Providers should already know how FFPS works.                                                       | FFPS specific training is available to CBOs who will be participating in FFPS. Prior knowledge is not a requirement.<br><br>Review the <a href="#">FFPS CA Child Welfare Training (CACWT) Access for Community Partners</a> for details on accessing FFPS-specific training.                                    |

| Program Design/Scope                                               |                                                                                                                                              |
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| MYTH                                                               | FACT                                                                                                                                         |
| The current 10 EBPs are the only ones that will EVER be available. | As specified in <a href="#">California's Plan</a> , approved EBPs may be updated over time as the state and Title IV-E agencies update CPPs. |

## Feedback and Questions

### *Feedback*

We welcome your feedback on this fact sheet. Please take a few moments to complete the [FFPS Fiscal Myth-Busting Feedback Survey](#) to share your input and suggestions. Your feedback will help inform future resources and ensure they are clear, effective, and supportive of FFPS Program implementation.

### *Questions?*

For additional questions regarding FFPS Program policy and requirements, please contact the CDSS FFPS Team at [ffpsapreventionservices@dss.ca.gov](mailto:ffpsapreventionservices@dss.ca.gov).