

Family First Prevention Services Act (FFPSA) Overview in Nevada

The Family First Prevention Services Act (FFPSA) was part of the Bipartisan Budget Act of 2018, and it represents some significant changes to federal child welfare financing. There are two main components:

1) Community Services:

- FFPSA allows use of IV-E funding for prevention services, which previously were ineligible for IV-E funding: specifically, services to prevent the removal of children from their homes and placement disruption for children in adoption and kinship guardian homes.
- The IV-E funds are available for children who are “candidates for foster care,” children in foster care who are pregnant or parenting, and parents or kin caregivers of “candidates for foster care.” States must define “candidates for foster care” for themselves, with the approval of the federal government.
- Services eligible for IV-E reimbursement must be well-supported (i.e. meet evidence-based practice standards), supported, or promising, and may include mental health treatment, substance abuse treatment, and in-home parent skill-based programs, which include parenting skills training, parent education, and individual and family counseling. Fifty percent of the IV-E prevention dollars must go toward well-supported programs and practices. FFPSA also allows for use of IV-E for family-based substance use residential treatment programs serving mothers and their children.

2) Congregate Care/Residential Settings:

- FFPSA places IV-E reimbursement limitations on placements in settings other than family foster homes, such as congregate care settings.
 - IV-E payments may only be used for 14 days in such settings.
- The exceptions to this rule include congregate care settings for pregnant or parenting youth, independent living, placements for commercially sexually exploited children, or congregate care settings that meet the requirements for a Qualified Residential Treatment Program (QRTP).
- QRTPs are programs that have a trauma-informed treatment model designed to address the needs, and clinical needs as appropriate, of children with serious emotional or behavioral disorders or disturbances, and can implement the necessary treatment identified in the child’s assessment.
- There are a variety of requirements to qualify as a QRTP including:
 - Using a trauma-informed treatment model;
 - Facilitating and documenting family participation including biological family and fictive kin;
 - Providing discharge planning and family-based support for at least 6 months post-discharge (which may be provided by the QRTP or a community provider);
 - Being licensed in accordance with IV-E foster care requirements and accredited by any independent, nonprofit accrediting organization such as The Commission on Accreditation of Rehabilitation Facilities (CARF), the Joint Commission on

Accreditation of Healthcare Organizations (JCAHO), or the Council on Accreditation (COA); and

- Has registered or licensed nursing staff and other licensed clinical staff who can provide care, who are on-site consistent with the treatment model, and available 24 hours a day and 7 days a week. Nursing and clinical staff do not need to be employees of the QRTP.
- Provide discharge planning and 6-months of aftercare (aftercare could be provided by the QRTP or by a community based provider with a formal agreement in place with the QRTP); and

What is Nevada doing to implement FFPSA?

1. Since July 2019, Nevada has been working to prepare a FFPSA Prevention Plan submission to the Children's Bureau
2. The Leadership Team has been formed, meeting bi-weekly and is charged with:
 - a. Preparing Nevada to implement the FFPSA to include both submission of the Prevention Plan, finalizing any changes to congregate care programs and type and determining statewide budget impact and feasibility.
 - b. Receiving recommendations from Prevention and Placement Workgroups on fiscal, IT, child welfare workforce, community and residential provider readiness and capacity.
 - c. Developing and disseminating a FFPSA Communication Plan to include outreach to the judicial system, family organizations and legislatures.

When will FFPSA be implemented in Nevada?

1. Nevada's current plan is to submit the state's FFPSA plan to the Children's Bureau at the end of April 2020.
2. The hope is that the Children's Bureau approves with enough time to implement October 2020.

How can I (or my organization) get involved with FFPSA in Nevada?

A website has been set up at www.dcfs.nv.gov/Programs/CWS/FFPSA for information and updates.