



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

ROY COOPER • Governor

MANDY COHEN, MD, MPH • Secretary

SUSAN OSBORNE • Assistant Secretary for County Operations for
Human Services

December 3, 2021

DEAR COUNTY DIRECTORS OF SOCIAL SERVICES

ATTENTION: Directors, Program Managers and Child Welfare Professionals

SUBJECT: Family First Prevention Service Act (FFPSA) EXCEPTIONS

PURPOSE: To notify county child welfare agencies of the exceptions to limits on IV-E funding under FFPSA and review the process of data entry, report reconciliation, and fund processing.

REQUIRED ACTION: __ Information Only __ Time Sensitive (MMDDYYYY) _x_ Immediate

On October 1, 2021 the 14-day limit for IV-E funds to be reimbursed for youth placed in congregate care took effect. The law allows for several exceptions to the 14-day limit. In the state of North Carolina, only two types of exceptions are currently active under FFPSA:

Exception 1: Clients in the Extended Foster Care 18-21 Program

County agencies do not have to make any changes to their current data entry process of placing a client in the correct facility and entering the determined funding source.

New Extended Foster Care clients entering the program should have the correct authority code and should be entered in the system under a new episode with a beginning effective **after** the date of their 18th birthday when the VPA is valid. Any updates to the client's prior foster care case should be completed before starting the new authority case.

Exception 2: Adolescent Parenting Clients who are placed in an appropriate program

FFPSA allows an exemption for youth who are participating in program that providing prenatal, postpartum, or parenting supports.

To qualify for this exception, the placement provider must be designated to provide the service. Eligible programs are indicated on the DSS Residential Child Care Facilities list, available at <https://www.ncdhhs.gov/media/13612/download?attachment> and have a designation for Adolescent Parent & Child Residential Services provider.

In addition, the client placed at this facility must be recognized as receiving these services. Based on the start date of services and the eligibility of the placement, IV-E reimbursement payments will be exempt from the 14-day federal funding limitation.

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF SOCIAL SERVICES

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Data Entry, Report Reconciliation, and Fund Processing:

Each county should verify the correct placement data for all children. Incorrect information could result in over reimbursement, a loss of reimbursement or even future costly adjustments. Entries should be made timely to reflect correct case information for the living arrangement type and facility information. Following these procedures will assure that the allowed funding is processed.

Due to the specific limitation of FFPSA, the actual entry or updates to funding in the payment system **are not required** for clients who exceed 14 days in a residential placement, with no exception noted. Both CPPS and NCFASST will calculate the allowed funding based on the placement information. Changes to the funding source should not be manually updated by the county agency. For time studies, workers will continue to use IV-E funding codes for children meeting the criteria, even if they are exceeding 14 days in a residential placement.

The state creates preliminary reports after each service period is complete. These reports should be reviewed to correct any errors before final reimbursements are processed. The final reports for reimbursements will process the 19th day of the following month or the workday before, if the 19th is during a holiday or weekend. The limitation of FFPSA will be reflected in the final reports and should be carefully reviewed for accuracy.

The Processing System Chart is attached for reference.

Please contact Tina Bumgarner at tina.bumgarner@dhhs.nc.gov with any questions.

Sincerely,



Linda Waite, Section Chief for Regulatory
and Licensing Services

Cc: Susan Osborne, Assistant Secretary for County Operations
Lisa Cauley, Senior Director of Child, Family, and Adult Services
Teresa Strom, Section Chief for County Operations
Carla McNeill, Section Chief for Permanency
Kathy Stone, Section Chief for CPS and Prevention

Attachment: Processing System Chart

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