

DCF Title IV-E Administrative Claiming Guide

March 17, 2021

The purpose of this guide is to consolidate information required for two key components of the DCF title IV-E administrative claim—the Random Moment Time Study (RMTS) and the Children and Families Cost Pool. This guide:

- Clarifies which organizational unit functions comprise the RMTS Staff Roster and associated cost reporting
- Assists the state and counties towards meeting the federal requirements outlined in DCF’s Cost Allocation Plan
- Provides efficient reporting protocols that facilitate efficient title IV-E claiming that supports state and county administrative operations

The scope of the RMTS and the Children and Families Cost Pool are children and family services that are provided by the Child Welfare unit of the agency; therefore, each agency’s RMTS Staff Roster should list employees performing direct child welfare casework and other related activities for children and families.

By federal law, the RMTS and the Children and Families Cost Pool calculation processes are linked, as the employees that are listed on the RMTS Staff Roster must also be included with the direct cost portion of the Children and Families Cost Pool.

Title IV-E foster care administrative revenue is one of the funding sources for the Children and Families Allocation (CFA), so maximizing the IV-E administrative claim is important to sustaining the state funding counties receive for child welfare services. Therefore, to maximize CFA it is important that state and local officials:

- Establish and maintain an accurate RMTS Staff Roster
- Require agency employees to respond promptly and accurately to RMTS emails
- Accurately report direct and indirect costs associated with employees on the RMTS Staff Roster

The following table provides an example of how these individual factors impact title IV-E claiming:

Title IV-E Sample Claim Calculation

Claim Component	How calculated	Example
Children and Families Cost Pool	Total of reported expenditures to SPARC lines 3301, 3329, and 3683 (See Section II)	\$1,000,000
Administrative Claiming rate	RMTS process estimates percentage of employee time spent on title IV-E claimable activities (See Section I)	* 55%
Title IV-E Penetration rate	Percentage of children in out-of-home care meeting title IV-E eligibility and reimbursability requirements	* 52%
Federal Financial Participation	Fixed federal reimbursement rate	* 50%
Total Reimbursement		$\\$1,000,000 * 55% * 52% * 50% =$ \$ 143,000

I. Random Moment Time Study (RMTS)

The RMTS process accumulates a statistically valid sample of employee activities and calculates the percentages of IV-E reimbursable activities based on those samples. Employees receive emails at random times that ask for information about their current work. The percentage of employee time that is devoted to activities that are reimbursable under the title IV-E program are then multiplied by the Children and Families Cost Pool to determine the estimated amount of potentially eligible services delivered.

Examples of title IV-E reimbursable activities include:

- Preparation for and participation in judicial determinations
- Case management and supervision
- Development and review of permanency or case plan
- Service coordination such as referrals, scheduling, and communicating with service providers
- Assisting in title IV-E eligibility determinations or redeterminations
- Recruitment, licensing, and rate setting of foster homes
- Transportation related to any title IV-E claimable activity

Staff Required to be Included on the RMTS Staff Roster

An employee must be included on the RMTS Staff Roster if his or her regularly assigned job duties include any direct child welfare casework such as Access, Initial Assessment, and/or Ongoing Services or other title IV-E claimable activities. The RMTS responses will determine whether the employee is performing a title IV-E claimable activity.

There are two requirements for inclusion on the RMTS Staff Roster.

1. Target Group- Employees who provide direct case management and related services for the following Target Groups, or any combination, must be included on the RMTS Staff Roster:
 - Child Protective Services
 - Child Welfare
 - Youth Justice
2. Job Function- The scope of direct case management and related services is defined as employees whose regularly assigned job duties include one or more of the following:
 - Access/Intake Worker
 - Case Aides who directly assist employees that serve the above Target Groups
 - Case Manager/Case Worker
 - Foster Care Coordinator/Licensing Specialist
 - Initial Assessment/Investigator

Individual employees may serve a mixed caseload of children, adults, and families that are receiving different types of human services from the agency. These employees must be included on the RMTS Staff Roster if their regularly assigned duties include child welfare activities, even if they are not dedicated full-time to child welfare.

Agency employees on the RMTS Staff Roster must have one of the following employment statuses:

- Permanent county employees funded entirely or partially by county funds
- LTE employees who meet any of the previous job descriptions and whose employment is anticipated to include at least two months of the entire upcoming quarter
- Contracted employees that perform one or more of the previously listed title IV-E reimbursable activities on behalf of county agencies (E.g., Foster Care Provider Licensing/ Recruitment Specialists)

Staff Potentially Included on the RMTS Staff Roster

Depending on your agency's organizational structure and employee duties, employees from the following units may also meet the criteria for inclusion on the RMTS Staff Roster:

- Children's Mental Health (CMH)
- Children's Long-Term Support (CLTS)
- Birth-to-Three
- Crisis Care
- Juvenile Diversion

Employees from these units may perform multiple program functions, such as child welfare case management in addition to CMH or CLTS services. In these situations, if an employee's regularly assigned job duties include core child welfare services, that employee must also be included on the RMTS Staff Roster. Inclusion of multi-program employees on the RMTS Staff Roster does not limit the ability of the agency to use those employees for other program functions.

Staff Excluded from the RMTS Staff Roster

The RMTS Staff Roster must not include an employee whose work is unrelated to direct case management and related child welfare services regardless of the employee's job title. This includes employees with the following work duties:

- Adult Alcohol and Other Drug Abuse (AODA) Services
- Adult Protective Services
- Adult Mental Health Services
- Aging and Disability Services
- Child Support administration
- Community Treatment and Support Services
- Economic Support
- Shelter Care
- Employees whose costs are directly charged to clients or other programs

An employee whose assigned job duties do not include child welfare activities but perform child welfare activities on a sporadic or after-hours basis is also excluded from the RMTS Staff Roster. Examples include being on call for after hours and weekends, providing emergency services, and temporarily covering for child welfare employee absences. However, if an employee's assigned job duties include consistent child welfare activities on an after-hours basis, this employee should be included on the RMTS Staff Roster. For example, if one of a person's assigned job duties is Initial Assessment, and the person's regular work hours are from 5:00 PM-1:00 AM, this person should be included on the RMTS Staff Roster.

In addition, agency management and support staff who are included in your agency's Administrative Management Support and Overhead (**AMSO**) costs are also excluded from the RMTS Staff Roster. Some examples of agency employees that should be excluded from the RMTS Staff Roster include:

- Division managers and directors
- Supervisors who do not carry a consistent child welfare caseload
- Legal services staff
- Fiscal staff, including provider payment coordinators located within the fiscal unit
- Administrative assistants, information technology, and other support staff

If you have questions about the RMTS Staff Roster preparation or submission requirements, please contact the DCF RMTS coordinator at DCFRMTS@wisconsin.gov

II. Children and Families Cost Pool

There are three components of an agency's monthly cost reporting that are used to create the Children and Families Cost Pool. These three components are reported as part of your monthly expense reports, and are used to support DCF's title IV-E administrative claim:

- Line 3301 – County child welfare employees
- Line 3329 – Private Child Placing Agencies
- Line 3683 – Agency management, support, and overhead (AMSO)

This document provides revised instructions regarding which costs should be included in the calculation of these amounts.

As a general rule, **the employees included on the RMTS Staff Roster must match the employee-related costs for the Children and Families Cost Pool.** If employees are excluded from the RMTS Staff Roster, their corresponding costs must also be excluded from the Children and Families Cost Pool. If the agency cannot discretely track the costs of units and individual employees, employees who might otherwise be excluded from the RMTS Staff Roster must be included if the corresponding costs are part of the pool of costs reported to DCF by the agency. **Appendix A** provides several organizational scenarios and cost reporting options.

1. Calculating the Children and Families Cost Pool

Line 3301 consists of **direct** employee and associated costs for child welfare related units and employees. All expenses related to employees identified above as being included on the RMTS Staff Roster must be reported on a monthly basis on line 3301. Once you have established which employees meet the above criteria, the direct costs that should be reported for these employees consist of:

- Salaries and fringe for all employees on the RMTS Staff Roster
- Salaries and fringe for direct supervisors¹ of employees on the RMTS Staff Roster
- Salaries and fringe for clerical and other employees who support employees on the RMTS Staff Roster, but are not included in AMSO
- Travel costs (mileage, food) for these employees and supervisors that are related to regular job duties (case management, home visits, etc.)
- Training fees and costs for these employees and supervisors (Non-PDS registration fees, mileage, hotels, etc.)
- Supplies, services, and equipment costs directly associated with these employees; and
- Rent, telecommunications and IT costs that are directly charged to the child welfare unit according to your county's **direct** cost allocation methodology.

***3301 exclusions:* Any costs claimed under title IV-E pass-through programs: Foster Parent Training, eWiSACWIS, Legal Services, and Legal Representation of Parents and Children. Any PDS registration fees for trainings are excluded from 3301 as they are claimed through a different method.**

Line 3329 consists of the net cost of payments provided to private Child Placing Agencies (CPA) for **administrative functions** performed by CPA employees on behalf of children placed by the county agency in foster homes supervised by the CPA. CPA employees who perform child welfare functions are included on the RMTS Staff Roster based on employee rosters submitted by CPAs, so it is

¹ Staffing and other direct costs for supervisors must be included on Line 3301 *unless* your agency's cost allocation plan requires their expenses be apportioned within your department's Agency Management, Support, and Overhead (AMSO) calculation. **Appendix A** discusses several scenarios in which this might be appropriate.

important to include the administrative portion of payments to CPAs in the Children and Families Cost Pool. The net cost calculation is the total administrative cost minus any refunds due to overpayments.

3329 exclusions: Do not report maintenance costs for children placed with CPAs on the 3329 line. Foster care maintenance costs recorded in eWiSACWIS are used as the basis for the title IV-E maintenance claim.

Example: John Smith is in a Foster Home from 1/1/20-3/31/20. The Placement Provider (Foster Parent) is Jane Jones. The Licensing Agency is We Care For Kids child placing agency. Maintenance payments are paid to Jane Jones for January, February, and March, These payments DO NOT go onto Line 3329. Administrative payments are paid to We Care For Kids child placing agency for January, February, and March. These payments DO go onto Line 3329.

Example: Jane Jackson is in a Foster Home from 1/1/20-3/31/20. The Placement Provider (Foster Parent) is Paul Thomas. The Licensing Agency is Smith County Health & Human Services. Since the county agency is the licensing agency, no administrative payments are made to a child placing agency. Therefore, none of the costs associated with this child for this time period belong on Line 3329.

Line 3683 consists of the share of **indirect** and Agency Management, Support and Overhead (**AMSO**) costs required to support the positions and functions listed on the RMTS Staff Roster for line 3301 according to your county's **indirect** cost allocation plan. Copies of indirect cost plans must be on file with the county clerk's or financial director's office and made available upon request as a condition of claiming indirect cost reimbursement. AMSO expenses reported on line 3683 must include a **proportional share** of salary, fringe benefits, and related travel for the following employees:

- Department management including director, deputy director, and other management
- Legal staff, including contracted services
- Accounting and finance staff
- Supervisors of child welfare workers who are not reported on Line 3301
- Agency support staff including clerical, information technology, and fiscal operations

The total AMSO amount should be proportional to the Children and Families Cost Pool's share of the county's total human service agency's direct costs. For example, if the Children and Families Cost Pool represents 20% of the county human services employee-related costs, it should similarly represent 20% of the agency's total AMSO allocation.

3683 exclusions: The following costs **must be excluded** from the 3683 total:

- Overhead costs for contracted employees – 100% of the costs paid to the contractor for the contracted employees should be reported as direct costs on Line 3301
- Any costs claimed under title IV-E pass-through programs: Foster Parent Training, eWiSACWIS, Legal Services, and Legal Representation of Parents and Children.

Line 3683 **must not** include AMSO costs for employees that are excluded from the Children and Families Cost Pool – for example, from units such as:

- Adult AODA Services
- Adult Protective Services
- Child Support
- Community Treatment and Support
- Community Support Services that do not include case management services for children placed in OHC
- W-2/Economic Support
- Employees whose costs are directly charged to clients or other programs

2. Submitting monthly cost reports

Once your agency's monthly cost reporting calculations are completed, agencies must submit the Cost Pool Informational Reporting for Federal Claiming Form in the SPARC Portal.

Enter the current month expenditure amounts for Lines 3301, 3329, and 3683 in the appropriate cells, and save/submit the form by the 28th of the following month.

The following supporting documentation must be maintained by the local human or social service agency and made available to DCF upon request:

- County staff roster/organizational chart to validate the RMTS Staff Roster
- Calculation of direct employee costs for line 3301
- Child Placing Agency invoices for line 3329
- Indirect cost allocation methodology used to generate an AMSO total for line 3683

3. Consistency with Other Cost Reporting

3301, 3329, and 3683 are informational line codes that do not affect the reimbursement agencies receive from DCF for the Children and Families Allocation or other DCF funds included in the state/county contract. It is not double claiming or double counting if a cost is placed on Line 3301 and on Line 3561. The methods of tracking costs for informational reporting purposes, however, should be consistent with the methods for tracking costs for reimbursement reporting purposes.

The informational cost reporting should also be consistent with the methods used by the agency for other financial reporting purposes, such as the annual Human Services Revenue Report (HSRR) and Expense Report for Human Service Programs (942).

If you have questions about Children and Families Cost Pool composition or submission requirements, please contact DCFFinanceGrants@wisconsin.gov

Appendix A: RMTS and Cost Reporting for Exceptional or Mixed Units

An agency's organizational structure will usually determine which units should and should not be included on the RMTS Staff Roster and the Children and Families Cost Pool. Common examples include counties with:

- **Separate Economic Support and Child Support units:** These must be excluded from the RMTS Staff Roster, as a separate Random Moment Study (RMS) process for economic support and child support determines the federal funding earned by those programs. Employees can be on the RMTS Staff Roster or the RMS Roster, not both.
- **Separate Department of Community Programs and Department of Social Services:** While Community Programs or other agency employees may work with children and families, including families currently receiving child welfare services, they are not providing child welfare case management services, and therefore should be excluded from the RMTS Staff Roster and the Children and Families Cost Pool.
- **A Unified Human Services department:** The agency may be organized into multiple units where the Child Welfare activities are part of a Children and Families unit while other programs such as Developmental Disabilities, Mental Health, Substance Abuse and Long-Term Support are separate units. Employees in those other units may work with children and families receiving child welfare services, but the employees in those separate units can be excluded from the RMTS Staff Roster *if* the agency can separate the costs of those other units from the amount of costs reported on line 3301.

For social services units that lack a clear division between child welfare and non-child welfare employees, the organizational structure and ability to track costs at the individual level determines whether employees should be included on the RMTS Staff Roster and their costs included in the Children and Families Cost Pool. The appendix table provides some hypothetical examples of how various county organizations could meet the RMTS Staff Roster and cost reporting requirements:

1. A "standard" social service organization with a distinct Child Welfare unit in which all staff directly perform or support child welfare case management.
2. A social services unit using a team approach to working with families, in which a child welfare worker is assigned to each case. Children's Long-Term Support (CLTS), Children's Mental Health (CMH), or Birth-to-Three workers may be assigned to work with children or family members, but do not have case management responsibilities and therefore can be excluded from the RMTS Staff Roster.
3. A social services unit with mixed caseloads; under this model, caseworkers directly serve a mix of children, families, and adult clients, while other employees provide non-child welfare services such as mental health and community support.

Reporting costs at the individual employee level requires the ability to track the compensation and other direct costs associated with that position, as well as that position's share of the unit's overall direct costs. To exclude the employees who do not have child welfare responsibilities in scenarios 2 and 3 from the RMTS Staff Roster, the agency must also exclude 33.3% of the supervisor and clerical support staff from the costs reported on line 3301. If an agency cannot track costs that discretely, then all social workers should be included on the RMTS Staff Roster and the entire cost of the unit reported on line 3301, such as shown in the third column of the appendix table.

While including an entire Social Services unit on the RMTS Staff Roster and its costs in the Children and Families Cost Pool may be administratively simpler, this decision has potential implications for claiming to other programs; therefore, it is advantageous to establish as discrete an RMTS Staff Roster and Children and Families Cost Pool as possible within the parameters of your agency's cost allocation plan.

Organization Scenario:	Cost Reporting – Discrete Method:	Cost Reporting - No Discrete Method:
<p>1. Child Welfare Unit: 1 Child Welfare Supervisor 1 Clerical support</p> <ul style="list-style-type: none"> • 1 CPS Intake/Assessment • 1 CPS Ongoing Services • 2 Child Welfare caseworkers • 2 Youth Justice caseworkers • 2 CW/YJ Case aides 	<p>RMTS Staff Roster: 1 CPS Intake/ Assessment, 1 Ongoing Services, 2 Child Welfare, 2 Youth Justice, 2 CW/JJ case aides</p> <p>Not on RMTS Staff Roster: 1 Supervisor, 1 Clerical Support</p> <p>3301: 100% of unit's direct expenses</p> <p>3683: AMSO allocation for 100% of unit's direct costs</p>	<p>RMTS Staff Roster: (same)</p> <p>3301: (same)</p> <p>3683 : (same)</p>
<p>2. Social Services Team Approach: 1 Social Services Supervisor 1 Clerical support <i>Employees with Child Welfare Case Management duties:</i></p> <ul style="list-style-type: none"> • 1 CPS Intake/Assessment • 1 CPS Ongoing Services • 3 Child Welfare caseworkers • 1 Youth Justice caseworkers <p><i>Employees with no Child Welfare Case Management duties:</i></p> <ul style="list-style-type: none"> • 1 Children's Long-Term Support • 1 Children's Mental Health; • 1 Birth-to-Three 	<p>RMTS Staff Roster: 1 CPS Intake/ Assessment, 1 Ongoing Services, 3 Child Welfare, 1 Youth Justice</p> <p>Not on RMTS Staff Roster: 1 CLTS, 1 CMH, 1 Birth-to-Three, 1 Supervisor, 1 Clerical Support</p> <p>3301: 100% of direct expenses for 6 employees on the RMTS Staff Roster + 66.7% direct expenses for Supervisor and Clerical Support staff (6 of 9 direct reports)</p> <p>3683: AMSO allocation for 100% * 6 FTE direct costs + 66.7% * Supervisor and Clerical Support direct costs</p>	<p>RMTS Staff Roster: all employees except Supervisor and Clerical Support</p> <p>3301: Salary, fringe, and other direct expenses for 100% of unit's 11 employees</p> <p>3683 : AMSO allocation for 100% of unit's direct costs</p>
<p>3. Social Services Unit with Mixed Caseloads: 1 Social Services Supervisor 1 Clerical support employee <i>Employees with Child Welfare duties:</i></p> <ul style="list-style-type: none"> • 1 CPS Intake/Assessment • 3 Mixed Caseload (children, families, and youths) caseworkers • 1 Children's Mental Health • 1 Children's Long-Term Support <p><i>Employees with no Child Welfare duties:</i></p> <ul style="list-style-type: none"> • 1 Birth to Three • 1 Adult Mental Health • 1 Community Support 	<p>RMTS Staff Roster: 1 CPS Intake/Assessment, 3 Mixed Caseload, 1 CMH, 1 CLTS</p> <p>Not on RMTS Staff Roster: 1 Birth to Three, 1 Adult Mental Health employee, 1 Community Support, 1 supervisor, 1 clerical support</p> <p>3301: 100% of direct expenses for 6 employees on the RMTS Staff Roster + 66.7% direct expenses for Supervisor and Clerical Support staff (6 of 9 direct reports)</p> <p>3683: AMSO allocation for 100% * 6 FTE direct costs + 66.7% * Supervisor and Clerical Support direct costs</p>	<p>RMTS Staff Roster: all employees except Supervisor and Clerical support</p> <p>3301: Salary, fringe, and other direct expenses for 100% of unit's 11 employees</p> <p>3683 : AMSO allocation for 100% of unit's direct costs</p>