

DCF Title IV-E Administrative Claiming Guide

December 6, 2016

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 Survey (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; and
- Provides efficient reporting protocols that facilitate efficient title IV-E claiming that supports state and county administrative operations.

The scope of the RMTS and Children and Families Cost Pool is children and family services that are provided by the “child welfare” unit of the agency; therefore, each agency’s RMTS roster should list staff performing child protective services (CPS) functions and other services to children and families. The purpose of the RMTS is to determine which specific activities performed by staff working with children and families are IV-E reimbursable activities.

By federal law, the RMTS and Children and Families Cost Pool calculation processes are linked, as the employees that comprise the direct cost portion of the Children and Families Cost Pool must also be listed on the RMTS roster (with specific exceptions for direct support staff such as supervisors).

The 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 roster;
- Require agency staff to respond promptly and accurately to RMTS calls; and
- Accurately report direct and indirect costs associated with staff in the RMTS 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 CORE lines 3301, 3329, and 3683 (see section II)	\$1,000,000
Administrative Claiming rate	RMTS process estimates percentage of staff time spent on title IV-E claimable activities (see section I)	* 60%
Title IV-E Penetration rate	Percentage of children in out-of-home care meeting title IV-E eligibility and reimbursability requirements	* 55%
Federal Financial Participation	Fixed federal reimbursement rate	* 50%
Total Reimbursement	$\\$1,000,000 * 60% * 55% * 50% =$	\$ 165,000

I. Random Moment Time Survey (RMTS)

The RMTS process accumulates a statistically valid sample of staff activities, and calculates the percentages of IV-E reimbursable activities based on those samples. RMTS is a quicker and more cost effective way to assign costs than requiring staff to keep 100% time reports. Staff receive phone calls at random times that ask information about their current work. The percentage of staff time that is devoted to activities that are reimbursable under the title IV-E program are then multiplied by the cost pool to determine the estimated gross 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; and
- Transportation related to any IV-E claimable activity.

Staff must be included in the RMTS **if their regularly assigned job duties include any direct child welfare casework** (including access, initial assessment, or ongoing services) or other title IV-E claimable activities. The RMTS calls will determine whether these workers are performing a title IV-E claimable activity. The following procedures will assist your agency in correctly establishing your RMTS roster; **Appendix A** is a quick guide to the roster selection process.

1. Staff included in the RMTS roster

As shown in the quick composition guide (**Appendix A**), there are two criteria for inclusion on the RMTS roster: unit function and assigned job duty. Staff who provide **direct case management and related services** (defined below) to the following case types must be included on the RMTS:

- Child Welfare cases (all CW case types, including mixed CW/JJ cases);
- Juvenile Justice cases (JJ case type only);
- Child Protective Services (CPS) case types (all combinations of CPS Family case types including CPS Family - Initial Assessment, Ongoing, and mixed CPS/JJ cases);
- DCF Guardianship – County Custody and ICPC case types, and;
- Pre-adoptive services (ICPC/Pre-Adoptive Child case types).

The scope of direct case management and related services is defined as workers whose *regularly assigned* job duties include one or more of:

- Access / intake workers;
- Initial assessment / investigations
- Case managers performing *any* child welfare activities (see following discussion);

- Case aides who directly assist one or more child welfare caseworkers; and
- Foster home coordinators, recruiters and licensing specialists.

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

In addition, agency workers on the RMTS roster must have an employment status of:

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

Depending on your agency's organizational structure and staff duties, workers from the following units **may also meet the criteria for inclusion** in the RMTS roster:

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

Staff 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 a worker's regularly assigned duties include core child welfare services, that worker must also be included in the RMTS.** Inclusion of multi-program workers in the RMTS does not limit the ability of the agency to use those workers for other program functions.

2. Staff excluded from the RMTS roster

The RMTS roster **must not** include staff whose work is unrelated to child welfare, **regardless of the employee's job title.** These include staff whose assigned work duties are:

- Adult Alcohol and Other Drug Abuse (AODA) Services;
- Adult Protective Services;
- Child Support administration;
- Community Treatment and Support;
- Adult Mental Health Service units that do not provide case management services for children;
- Economic Support services; or
- Employees whose costs are directly charged to clients or other programs.

In addition, exclude staff whose *regularly* assigned job duties do not include child welfare activities, but perform child welfare activities on a **sporadic or after-hours** basis. Examples include being on call for after hours and weekends, providing emergency services, and

temporarily covering for child welfare staff absences. These staff **must be excluded** from the RMTS roster.

Also exclude agency management and support staff who are included in your agency's Administrative Management Support and Overhead (**AMSO**) costs. Some examples of agency staff that should be excluded from the RMTS roster include:

- Division managers and directors;
- Supervisors other than child placing agency supervisors who also carry a child welfare caseload;
- Legal services staff;
- Fiscal staff, including provider payment coordinators located within the fiscal unit; and
- Administrative assistants, information technology, and other support staff;

3. RMTS roster preparation

To facilitate proper sampling, agencies are required to submit an RMTS roster for each upcoming quarter in a Microsoft Excel file. DCF will supply your agency with an Excel file that contains the following fields:

- County Code
- Agency name;
- Employee name;
- Employee WIEXT ID;
- Employee Phone number (###-###-####);
- Extension (if applicable);
- Email address;
- Work Schedule
- Target population(s) served by employee (*Child Protective Services; Juvenile Justice; Other Child Welfare*); and
- Job function(s) (*Access/Intake; Initial Assessment/Investigations; Case Management; Case Aide; Provider Licensing*);
- Supervisor name;
- Supervisor phone number (###-###-####);
- Supervisor email address; and
- Employee-specific notes (extended leave, start/end dates, etc.).

By the end of the last week of February, May, August and November, the DCF RMTS coordinator will e-mail the previous quarter's RMTS roster to the agency's designated RMTS staff roster coordinator. Changes that must be made to the roster include:

- Delete employees who no longer meet the inclusion criteria from procedures 1 and 2;
- Add new hires and replacement employees that meet the criteria for inclusion;
- Edit employee information such as name changes, title or job function changes, telephone numbers, e-mail addresses; and
- Identify in the "notes" field staff that will be out for extended approved leave (e.g., maternity leave, medical leave, etc.) during the next quarter.

The completed roster file must be emailed to the DCF RMTS coordinator by the 2nd Friday of the month prior to the start of the next quarter (March, June, September or December). The file or email message must also include the name, title, and telephone number of your agency's RMTS roster coordinator.

In addition, agencies must email the RMTS coordinator if any of the following changes occur:

- Any staff changes between submitting your quarterly updates and the start of the next quarter; or
- At any time employees on the current RMTS roster terminate or go on extended leave, including applicable termination or leave dates.

If you have questions about the RMTS roster preparation or submission requirements, please contact the DCF RMTS coordinator:

Sarah Cannon

Sarah.Cannon@wi.gov

(608) 266-8147

II. DCF 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 staff;
- Line 3329 – Private Child Placing Agencies; and
- 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 staff included in the RMTS roster must match the staff-related costs for the administrative cost pool.** If staff are excluded from the RMTS roster, their corresponding costs must also be excluded from the cost pool. If the agency cannot discretely track the costs of units and individual staff, staff who might otherwise be excluded from the RMTS roster must be included if the corresponding costs are part of the pool of costs reported to DCF by the agency. **Appendix B** provides several organizational scenarios and cost reporting options.

1. Calculating the cost pool

Line 3301 consists of **direct** staffing and associated costs for child welfare related units and employees. All expenses related to employees identified above as being included in the RMTS roster sample 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 roster;
- Salaries and fringe for direct supervisors¹ of employees on the RMTS roster;
- Salaries and fringe for clerical and other staff who support employees on the RMTS roster, but are not included in AMSO
- Travel costs for these employees and supervisors;
- 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: The costs reported on line 3301 must exclude staff expenses used as match by the Child Welfare Training Partnerships to claim title IV-E training reimbursement. Per DCFS Administrator's Memo 2001-10, the Training Partnerships will notify the county agency of the amount of staff expenses used as training match so your agency can subtract that amount from the staff expenses reported on line 3301:

<https://dcf.wisconsin.gov/files/cwportal/policy/pdf/memos/2001-10.pdf>

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

Similarly, staff expenses claimed as direct costs for title IV-E pass-through programs, including Foster Parent Training and Local eWiSACWIS Costs, must be subtracted from the staff expenses reported on line 3301.

Line 3329 consists of the net cost of payments provided to private Child Placing Agencies (CPA) for **administrative functions** performed by CPA staff 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 in the RMTS based on employee rosters submitted by CPAs, so it is important to include the administrative portion of payments to CPAs in the IV-E administrative 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.

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 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 in the 3301 cost pool; and
- Support staff including clerical, information technology, and fiscal operations.

The total AMSO amount should be proportional to the Children and Family 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 staff-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 staff – 100% of the costs paid to the contractor for the contracted staff should be reported as direct costs on Line 3301;
- Any costs that will be claimed to Title IV-E Legal Services and Local eWiSACWIS pass-through programs; these are claimed on CORE lines 3553, 3573, 3601, 3602, and 3603.

Line 3683 **must not** include AMSO costs for staff that are excluded from the DCF 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; and
- Staff 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 download and save an editable version of the following Excel form:

<http://dcfcore.wisconsin.gov/coreforms/default.htm>

Enter the totals for Lines 3301, 3329, and 3683 (as well as other costs for which you are seeking DCF reimbursement) in the appropriate cells, and save the document with a title that contains the county code, agency name, month, and year for which you are reporting costs—for example, Rock County’s June 2013 claim should be saved as “53 Rock CTY 06 2013.xls”.

The completed cost reporting forms must be emailed **no later than the 28th of the following month** to: DCFDESFinanceGrants@wisconsin.gov.

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 roster;
- Calculation of direct staffing costs for line 3301;
- Child Placing Agency invoices for line 3329; and
- Indirect cost allocation methodology used to generate an AMSO total for line 3683.

3. Consistency with Other Cost Reporting

Costs are reported in CORE for the administrative cost pool using informational lines that do not affect the reimbursement agencies receive from DCF for the Children and Families Allocations or other DCF funds included in the state/county contract. 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).

Appendix A: RMTS Roster Composition Quick Guide

<p style="text-align: center;">Unit Function</p>	<p>Include: <i>employees from units whose assigned duties directly serve the following case types:</i></p> <ul style="list-style-type: none"> • Child Welfare cases (all CW case types, including CW/JJ) • Child Protective Services cases (all CPS case types); • Juvenile Justice cases (JJ case type); • Guardianship/pre-adoptive/ICPC cases; • Units that directly support multiple child welfare case types (e.g., Foster Care licensing units); • Mixed caseload units that include child welfare case management. 	<p>Potentially Include: <i>Employees from units such as the following if staff's assigned duties include performing child welfare case management and other title IV-E claimable activities:</i></p> <ul style="list-style-type: none"> • Children's Mental Health; • Children's Long-Term Support; • Crisis Care; • Juvenile Diversion Units. 	<p>Exclude: <i>Employees whose assigned duties do not include child welfare case management activities:</i></p> <ul style="list-style-type: none"> • Adult AODA Services; • Adult Protective Services; • Child Support; • Community Treatment and Support; • Adult Mental Health Service units; • Economic Support; • Employees whose costs are directly charged to clients or other programs; and • On-call or after-hours staff who only perform sporadic IV-E claimable activities such as supervising visits or transporting children.
<p style="text-align: center;">Job duty</p>	<p>Include: <i>permanent, contracted, or continuing LTE workers from eligible units whose job classification matches one or more of:</i></p> <ul style="list-style-type: none"> • Child welfare caseworker or case aides; • Juvenile justice caseworker or case aides; • Adoption placement and finalization; • Access/Initial Assessment; • Ongoing Services; • Foster home recruitment and licensing; and • Mixed caseload caseworkers with child welfare and non-child welfare clients. 		<p>Exclude: <i>administration, management, and other support job classifications from all units:</i></p> <ul style="list-style-type: none"> • Director, deputy director, and other management staff • Supervisors other than CPS supervisors who also carry a child welfare caseload • Information technology • Administrative assistants • Legal services • Any staff whose activity is billed 100% to third party sources or financed 100% by a direct grant (regardless of job classification) • Any staff whose costs are allocated via Administration Management Support and Overhead (AMSO).

Appendix B: 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 in the RMTS and DCF Cost Pool. Common examples include counties with:

- **Separate Economic Support and Child Support units.** These must be excluded from the IV-E RMTS, as a separate Random Moment Study (RMS) process for economic support and child support determines the federal funding earned by those programs. Staff can only be in one RMTS or RMS.
- **Separate Department of Community Programs and Department of Social Services.** While the Community Programs or other agency staff 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 and DCF cost pool.
- **A Unified Human Service department.** The agency may be organized into multiple units or divisions 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. Staff in those other units may work with children and families, including families currently receiving child welfare services, but the staff in those separate units can be excluded from the RMTS provided 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 staff, the organizational structure and ability to track costs at the individual level determines whether staff should be included in the RMTS roster and their costs included in the administrative cost pool. The appendix table provides some hypothetical examples of how various county organizations could meet the RMTS roster and cost reporting requirements:

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

Tracking costs at the individual staff 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 workers who do not have child welfare responsibilities in scenarios 2 and 3 from the RMTS, 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 in the RMTS 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 roster and its costs in the DCF 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 roster and DCF cost pool as possible within the parameters of your agency's cost allocation plan.

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

