

DCF Title IV-E Tribal Administrative Claiming Guide

The purpose of this guide is to consolidate information required for two key components of the tribal DCF Title IV-E administrative claim—the Social Services Administrative Tribal Time Survey (SSATTS) and the Children and Families Cost Pool. This guide:

- Clarifies which organizational unit functions comprise the SSATTS staff roster and associated cost reporting;
- Assists the state and tribes 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 tribal administrative operations.

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

By federal law, the SSATTS 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 SSATTS roster (with specific exceptions for direct support staff such as supervisors).

The IV-E foster care administrative revenue is the main funding source for the tribal pass-through agreements, so maximizing the IV-E administrative claim is important to sustaining the state funding tribes receive for child welfare services. Therefore, to maximize IV-E claiming it is important that state and tribal officials:

- Establish and maintain an accurate SSATTS roster;
- Require tribal staff to respond promptly and accurately to SSATTS e-polling surveys; and
- Accurately report direct and indirect costs associated with staff in the SSATTS roster.

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

<u>Title IV-E Sample Claim Calculation</u>		
Claim Component	How calculated	Example
Children and Families Cost Pool	Total of reported expenditures to SPARC lines 3301T, 3329T, and 3683T (see section II)	\$20,000
Administrative Claiming Rate	SSATTS 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	$\\$20,000 * 60\% * 55\% * 50\% =$	\$ 3,300

**NOTE: The federal regulations appear to support the use of an individual tribe's rate, a statewide tribal rate, or the rate for all the children provided that the selected method is used consistently. In Wisconsin, the statewide rate is generally higher than the tribal penetration rate.*

I. Social Services Administrative Tribal Time Survey (SSATTS)

The SSATTS process accumulates a valid sample of staff activities, and calculates the percentages of Title IV-E reimbursable activities based on those samples. Staff receive e-polling surveys for a random 2 week period each quarter that ask information about their work during that period. 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 amount that was Title IV-E reimbursable.

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 SSATTS 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 SSATTS surveys will determine whether these workers are performing a Title IV-E claimable activity. The following procedures will assist your tribe in correctly establishing your SSATTS roster; **Appendix A** is a quick guide to the roster selection process.

1. Staff Included in the SSATTS Roster

As shown in the quick composition guide (**Appendix A**), there are two criteria for inclusion on the SSATTS 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 SSATTS:

- Child Welfare cases (all CW case types, including mixed CW/JJ cases);
- Juvenile Justice cases (JJ case type only); and
- Child Protective Services (CPS) case types (all combinations of CPS Family case types including CPS Family - Initial Assessment, ongoing, and mixed CPS/JJ cases).

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 SSATTS if their regularly assigned duties include any child welfare activities, even if they are not dedicated full-time to child welfare.

In addition, tribal workers on the SSATTS roster must have an employment status of:

- Permanent tribal employees funded entirely or partially by tribal 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 tribal agencies (e.g., on-site Foster Care Licensing specialists).

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

- Prevention Services;
- 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 SSATTS**. Inclusion of multi-program workers in the SSATTS does not limit the ability of the agency to use those workers for other program functions.

2. Staff excluded from the SSATTS roster

The SSATTS roster **must not** include staff whose work is unrelated to child welfare and who do not perform any child welfare job duties, **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 SSATTS roster.

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

To facilitate proper sampling, agencies are required to submit an SSATTS roster for each upcoming quarter that contains the following fields:

- Tribe name;
- Employee name;
- Email address.

By the 2nd week of March, June, September and December, the DCF SSATTS coordinator will e-mail the previous quarter's SSATTS roster to the tribe's designated SSATTS 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 or e-mail addresses.

The completed roster file must be emailed to the DCF SSATTS coordinator by the last business day of March, June, September or December. The file or email message must also include the name, title, and telephone number of your tribe's SSATTS roster coordinator.

In addition, agencies must email the SSATTS 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 SSATTS roster terminate or go on extended leave, including applicable termination or leave dates.

4. SSATTS Time Study

Each staff listed on the time study roster must complete an online survey for all days and hours worked during the time study period. Each survey is broken down into 15 minute intervals for the worker to fill in using the one activity code that best describes the activity they were performing at that time:

- 01 – Out-of-Home Care (OHC) Case Management
- 02 – OHC Legal and Service Support
- 03 – Foster Home Management and Recruitment
- 04 – IV-E Eligibility Assistance
- 05 – Attending Child Welfare Training
- 06 – Placement Prevention for At-Risk Children
- 07 – In-Home/Informal Kinship Case Management
- 08 – Therapy and Counseling Services
- 09 – Adoption Assistance Activities
- 10 – Other Program and Social Service Activities
- 11 – General Administration

The tribe shall ensure that all required staff complete the quarterly time study by **close of business the Wednesday following the two week time study period.**

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

DCFRMTS@wisconsin.gov

II. DCF Children and Families Cost Pool

There are three components of a tribe'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 3301T – Tribal child welfare staff;
- Line 3329T – Private Child Placing Agencies; and
- Line 3683T – Tribal 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 SSATTS roster must match the staff-related costs for the administrative cost pool**. If staff are excluded from the SSATTS 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 SSATTS 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 3301T 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 SSATTS roster sample must be reported on a monthly basis on line 3301T. 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 SSATTS roster;
- Salaries and fringe for direct supervisors¹ of employees on the SSATTS roster;
- Salaries and fringe for clerical and other staff who support employees on the SSATTS 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 tribe's **direct** cost allocation methodology.

¹ Staffing and other direct costs for supervisors must be included in the 3301T cost pool *unless* your tribe'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.

**What are options for claiming reimbursement for Tribal Attorney expenditures?
How should tribes report time for attorneys where the indirect rate negotiated with
the BIA splits their costs among indirect (overhead) and direct costs?**

- For tribes where 100% of attorney costs are included in the indirect cost pool, do not report their time.
- Where tribal attorneys are partially included in the indirect cost pool and they regularly perform claimable Title IV-E activities, the proportional amount of the attorney salary, fringe benefits, and associated costs that are allocable as direct costs should be reported in the direct cost pool.

Line 3329T 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 tribe in foster homes supervised by the CPA. CPA employees who perform child welfare functions are included in the SSATTS 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.

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

Line 3683T consists of the share of **indirect** and Agency Management, Support and Overhead (**AMSO**) costs required to support the positions and functions listed on the SSATTS roster for line 3301T according to your tribe's **indirect** cost allocation plan. Copies of indirect cost plans must be on file and made available upon request as a condition of claiming indirect cost reimbursement. AMSO expenses reported on line 3683T 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; if not included in tribal indirect cost rate;
- Accounting and finance staff;
- Supervisors of child welfare workers who are not reported in the 3301T 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 tribe's total human service agency's direct costs. For example, if the Children and Families cost pool represents 20% of the tribe's human services staff-related costs, it should similarly represent 20% of the agency's total AMSO allocation.

3683T exclusions: The following costs **must be excluded** from the 3683T 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 3301T;

Line 3683T **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.

What Tribal expenditures are required? Are there any federal funding sources that can be used toward the tribal share?

Because Title IV-E is a reimbursement program, funds for which reimbursement can be claimed can come from the following sources:

- Tribal cash outlays;
- State GPR funds provided to the tribe;
- Private Foundation Funds that support title IV-E reimbursable activities; and
- Two types of federal funds – BIA 638 Contract and CDBG – so long as these funds are used for title IV-E reimbursable activities, and are not used as match for another Federal program *unless* the other Federal program explicitly allows such funds to be used as a match for title IV-E.

Funds that are ineligible for reimbursement include Federal IV-B funds and other federal grants. These ineligible funds must be removed from your reimbursement base.

2. Submitting monthly cost reports

Once your agency's monthly cost reporting calculations are completed, the Data must be entered into the SPARC portal with the agencies reimbursable expenses.

Enter the totals for Lines 3301T, 3329T, and 3683T (as well as other costs for which you are seeking DCF reimbursement) in the appropriate cells, and click on the submit button at the bottom of the page.

The completed cost reporting forms must be entered and submitted **no later than the 23rd of the following month.** (Note: make sure you are entering into the previous month. The system defaults to the current month). The portal is available for 90 days for any necessary corrections. (Adjustments after 90 days need to be submitted to the SPARC staff)

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

- Tribal staff roster/organizational chart to validate the SSATTS roster;
- Calculation of direct staffing costs for line 3301T;
- Child Placing Agency invoices for line 3329T; and
- Indirect cost allocation methodology used to generate an AMSO total for line 3683T.

3. Consistency with Other Cost Reporting

Costs are reported in SPARC 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/tribal 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.

Appendix A: SSATTS Roster Composition Quick Guide

Unit Function	<p>Include: employees from units whose assigned duties directly serve the following case types:</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: 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:</p> <ul style="list-style-type: none"> • Prevention Services; • Children's Mental Health; • Children's Long-Term Support; • Crisis Care; • Juvenile Diversion Units. 	<p>Exclude: Employees whose assigned duties do not include child welfare case management activities:</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.
Job duty	<p>Include: permanent, contracted, or continuing LTE workers from eligible units whose job classification matches one or more of:</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: administration, management, and other support job classifications from all units:</p> <ul style="list-style-type: none"> • Director, deputy director, and other management staff • Supervisors other than CPA 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: SSATTS and Cost Reporting for Exceptional or Mixed Units

A tribe's organizational structure will usually determine which units and the respective unit staff should and should not be included in the SSATTS and DCF Cost Pool. Common examples include tribes with:

- **Separate Department of Community Programs and Department of Social Services.** While the Community Programs or other tribal 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 SSATTS and DCF cost pool.
- **A Unified Human Service department.** The tribal 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 SSATTS provided the agency can separate the costs of those other units from the amount of costs reported on line 3301T.

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 SSATTS roster and their costs included in the administrative cost pool. The appendix table provides some hypothetical examples of how various tribal organizations could meet the SSATTS 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 SSATTS;
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 SSATTS, the agency must also exclude 33.3% of the supervisor and clerical support staff from the costs reported on line 3301T. If an agency cannot track costs that discretely, then all social workers should be included in the SSATTS and the entire cost of the unit reported on line 3301T, such as shown in the third column of the appendix table.

While including an entire Social Services unit on the SSATTS 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 SSATTS 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 • 1 CPS Intake/Assessment • 1 CPS Ongoing Services • 2 Child Welfare caseworkers • 2 Juvenile Justice caseworkers • 2 CW/JJ Case aides	SSATTS: 1 CPS Intake/ Assessment, 1 Ongoing Services, 2 Child Welfare, 2 Juvenile Justice, 2 CW/JJ case aides Not on SSATTS: 1 Supervisor, 1 Clerical Support 3301T: 100% of unit's direct expenses 3683T: AMSO allocation for 100% of unit's direct costs	SSATTS: (same)
2. Social Services Team Approach: 1 Social Services Supervisor 1 Clerical support <i>Staff with Child Welfare Case Management duties:</i> • 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> • 1 Children's Long-Term Support • 1 Children's Mental Health; • 1 Birth-to-Three	SSATTS: 1 CPS Intake/ Assessment, 1 Ongoing Services, 3 Child Welfare, 1 Juvenile Justice Not on SSATTS: 1 CLTS, 1 CMH, 1 Birth-to-Three, 1 Supervisor, 1 Clerical Support 3301T: 100% of direct expenses for 6 staff on the SSATTS + 66.7% direct expenses for Supervisor and Clerical Support staff (6 of 9 direct reports) 3683T : AMSO allocation for 100% * 6 FTE direct costs + 66.7% * Supervisor and Clerical Support direct costs	SSATTS: all staff except Supervisor and Clerical Support 3301T: Salary, fringe, and other direct expenses for 100% of unit's 11 staff 3683T: 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> • 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> • 1 Birth to Three • 1 Adult Mental Health • 1 Community Support	SSATTS: 1 CPS Intake/Assessment, 3 Mixed Caseload, 1 CMH, 1 CLTS, 1 Birth-to-Three Not on SSATTS: 1 Birth to Three, 1 Adult Mental Health staff, 1 Community Support, 1 supervisor, 1 clerical support 3301T: 100% of direct expenses for 6 staff on the SSATTS + 66.7% direct expenses for Supervisor and Clerical Support staff (6 of 9 direct reports) 3683: AMSO allocation for 100% * 6 FTE direct costs + 66.7% * Supervisor and Clerical Support direct costs	SSATTS: all staff except Supervisor and Clerical support 3301T: Salary, fringe, and other direct expenses for 100% of unit's 11 staff 3683 : AMSO allocation for 100% of unit's direct costs

Appendix C: Tribal IV-E Claiming Timelines

