

Preparing for Direct Title IV-E – A Self Assessment *

In Place	Need to Develop	Key Elements of a Title IV-E Program; Considerations
		<i>Is Everyone on Board ?</i>
		❖ Does Tribal leadership and management fully understand the costs and benefits of this program?
		❖ Are leaders from <u>all</u> key Tribal programs and agencies on board (Social Services, ICWA, CPS, Courts, Attorneys, Licensing, and Fiscal) ?
		<i>Financial Means To Fully Fund A Foster Care Program ?</i>
		❖ Upfront expenditures are the Tribe's responsibility. Title IV-E will reimburse a <u>portion</u> of expenditures for <u>eligible</u> children. Can the Tribe meet upfront costs and match requirements?
		❖ Does the Tribe's service population warrant operating this program? How many children are placed in out of home care currently? Of these, how many might be IV-E eligible? What is the Tribe's potential title IV-E reimbursement?
		<i>Federal Program Applications Required:</i>
		❖ Title IV-E Plan Pre-Print submitted and approved
		❖ Title IV-B, subpart 1 , grant application submitted and approved
		<i>Tribal Infrastructure Required:</i>
		❖ A designated Title IV-E agency co-located with the Tribal IV-B program
		❖ A Child Welfare program , including pre-placement preventive services, reunification services, and case management (meets the requirements of Title IV-B subpart 1).
		❖ Tribal codes, law, policy & procedures to assure compliance with all federal Title IV-E requirements (as set forth in Title IV-E Pre-Print and federal law, regulations and polices)
		❖ A Legal process for placing children in foster care (involuntary & voluntary)
		❖ A Legal process for required judicial activities (required hearings and judicial determinations)
		❖ A Tribal Court and/or State Court to meet legal process requirements
		❖ A Data collection and reporting system (AFCARS): Collect and report 66 Foster Care Data Elements regarding children for whom the Tribal CW agency has responsibility for placement, care,

* This tool was developed by Region X staff for training purposes only.

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		or supervision and 37 Adoption Data Elements on all adopted children for whom the agency is providing adoption assistance. A SACWIS is options.
		❖ Foster and adoptive home recruitment and licensing
		❖ A Foster Care maintenance payments program
		❖ An Adoption Assistance payment program
		❖ A Guardianship Payment program (optional)
		❖ Financial management and accounting system
		❖ A Cost allocation methodology (CAM) as to how the agency will identify, measure and allocate all agency costs incurred in support of the program. Claims must be made in accordance with the CAP
		❖ Fiscal reporting - Quarterly Reports of Estimates and Actual Expenditures (CB-496) required
		❖ An Eligibility determinations process (initial, redeterminations, and ongoing)
		○ Access to family income and employment information (for eligibility determinations)
		○ Access to child support information (for eligibility determinations)
		○ Access to Medicaid, SSI information (for eligibility determinations)
		❖ A System for training and support of staff to ensure ongoing compliance with Title IV-E
		❖ Sufficient trained personnel to support all aspects of this program. Program, licensing, eligibility, trainers, judges, attorneys, and staff to meet the fiscal tracking and reporting requirements.
		❖ A System for training and support for foster and adoptive parents
		<i>Collaborations and Partnerships</i>
		❖ Is there a current State-Tribal IV-E agreement in place? If so, what types of support, services or agreements can the State offer if the Tribe chooses direct IV-E ? (Data system? Courts?)
		❖ Collaboration needed with State IV-B/IV-E agency, Medicaid, and Child Support agencies to ensure program requirements are met.
		❖ What can community partners offer to support the Tribe? What collaborations exist or need to be developed? (i.e., recruitment, licensing, Courts, local match, etc)