

The Only Family First Plan Under Review Right Now

[July 16, 2019](#) [John Kelly](#)

As of last week, *The Chronicle of Social Change* had identified 10 states that say they plan to take on the Family First Prevention Services Act when it takes effect in October of this year. On the other side, we have [verified 29 states](#) that plan to delay on the law until up to October of 2021.

But it appears that, at least as of June, only one child welfare system has formally submitted its plan for Family First implementation, and it is not a state – it’s the District of Columbia. In its plan, the city’s Child and Family Services Agency (CFSA) describes a three-part vision for expanding its maltreatment prevention and family preservation options.

“We are very proud of our plan, which has generated a lot of buzz in the child welfare world,” said CFSA Director Brenda Donald, in an e-mail with *Youth Services Insider*.

The Family First Act [became law in early 2018](#), and dramatically amends the Title IV-E program, an entitlement that heretofore has been limited to support for foster care and adoption. Under Family First, states can draw in IV-E money for services aimed at preventing the use of foster care in some cases, but their access to federal dollars for group homes and other so-called “congregate care” placements is greatly limited.

Most of the law takes effect in October of 2019, but states have the ability to seek a delay on implementation until 2021.

States planning to implement Family First in 2019: Alaska, Ark., Del., D.C., Kansas, Ky., Md., Mo., Neb., N.M., and Utah.

The numbers show why D.C. would be in a good position to go first here. In the past decade, its foster care totals have continued to drop even as many states experienced a surge in youth removed from their homes. There were 2,092 kids in D.C. foster care in 2010, according to CFSA.

This year, there are about 860. And only 67 of them, about 7 percent, are in congregate care. So the exposure of D.C. to new federal limits for those placements is relatively small.

CFSA is also coming off a five-year waiver on its IV-E program, through which it was allowed to use federal funds for things outside the realm of foster care and adoption. D.C. used its waiver freedom to build up its primary and foster care prevention.

“Enactment of the Family First Prevention Services Act ... provided an opportunity to bridge the end of CFSA’s IV-E Waiver ... with an on-ramp to a holistic prevention strategy for D.C.,” the city wrote, in its new IV-E plan. “But only if coupled with a broader primary prevention plan.”

The city uses a homestead analogy to describe its plan for a “front yard,” “front porch” and “front door” in serving the community. Following is the agency’s description of those tiers:

- Families in CFSA’s Front Yard are not involved with CFSA but may demonstrate potential risk factors for involvement. Primary prevention efforts are designed to ensure children and families in CFSA’s Front Yard are supported in their communities.
- Families at CFSA’s Front Porch may have engaged with CFSA, but have been able to safely remain, or reunify with their families, and receive community-based prevention services.
- Families engaged at CFSA’s Front Door have an open case with CFSA. Whenever possible, CFSA prioritizes keeping families together and working with parents and children in their communities.

To carry out this vision, CFSA lists 22 different service models it plans to use that starts with in-home parenting help and runs through post-adoption supports. The plan includes four of the [seven models](#) already approved for IV-E dollars by the newly established Family First Clearinghouse and two of the three models that are currently under review by the clearinghouse.

Of the remaining 16 programs listed in CFSA’s plan, the agency projects that, eventually, 10 of them will be approved by the Family First Clearinghouse. These include Connecticut’s [recovery coach program](#) to help parents through addiction treatment, Parents Anonymous, the Effective Black Parenting Program, and [YVLifeSet](#), the Youth Villages’ model for helping older foster youth transition to independence (in this case pregnant or parenting foster teens, who are universally eligible for Family First services.)

Parts of the plan that CFSA does not expect will be fundable through Family First include Mobile Stabilization Services, which seeks to de-escalate family crises, and the services of the Center for Adoption Support and Education.

States that have announced delay on Family First: Ala., Ariz., Conn., Fla., Ga., Idaho, Ill., Ind., Iowa, La., Maine, Mich., Minn., Miss., Montana, Nev., N.H., N.J., N.Y., N.C., Ohio, Okla., Penn., R.I., S.C., Tenn., Texas, Wisc., and Wyo.

Whether all of these models end up on the clearinghouse list is hard to predict, and *when* they’d be added is an even bigger question mark given how long it took the clearinghouse to put out an initial list of seven. On the other hand, the Children’s Bureau (CB) recently told states that there would be an opportunity in the short term for them to get funded on some services not yet approved by the clearinghouse.

Guidance on exactly how that process would work has not gone out yet, according to CB spokesperson Monique Richards.

CFSA submitted its IV-E plan in April, and as of mid-June, Donald said, “Children’s Bureau told us that no other states had submitted.” She said CFSA has already received “positive, but informal, feedback” on its Family First plan, but has yet to hear about approval.

“We are waiting with bated breath,” Donald said.

[Click here](#) to read a copy of D.C.’s IV-E plan for Family First.