



State of Florida
Department of Children and Families

Ron DeSantis
Governor

Shevaun L. Harris
Secretary

DATE: September 27, 2023

TO: Child Protection Directors
Community-Based Care Lead Agency CEOs

THROUGH: Casey Penn, Deputy Secretary

FROM: Kate Williams, Assistant Secretary for Child & Family Well Being *K. Williams*

SUBJECT: CFOP 170-1, Chapter 17: Prevention Services (FFPSA)

PURPOSE: The purpose of this memorandum is to provide notification on the newly created child welfare operating procedure, CFOP 170-1, Chapter 17, regarding the implementation of Title IV-E prevention services to promote, safeguard, and restore children and their families while building resilience to prevent entry into the child welfare system, by allowing federal reimbursement for mental health services, substance use treatment, and in-home parenting skills training.

BACKGROUND:

The Family First Prevention Services Act (FFPSA) was passed into law on February 9, 2018, as part of the Bipartisan Budget Act of 2018 and has several provisions to enhance support for families to help children remain at home, reduce the unnecessary use of congregate care, and build the capacity of communities to support children and families. This act challenged states to redesign their child welfare systems, putting the focus on preventing children from entering foster care and, when removal is necessary, ensuring children are cared for in the best, family-like settings. FFPSA is providing the opportunity for Florida to deepen its commitment to prevention by enhancing the service array in local communities to address mental health and substance abuse needs, proactively reducing the need for crisis intervention services, and building parent and caregiver skills to promote strong, resilient families.

The Department's implementation of FFPSA includes significant changes with the creation of policy that outlines the following:

- The development of the definition of "candidate for foster care".
- The requirement for a prevention plan that is developed in collaboration between the Department, Community-Based Care Lead Agencies (CBCs), community stakeholders, state agencies, local universities, families, youth, and local communities to establish a human-centered continuum of services.
- Afford families with "no wrong door" access to community-based, coordinated, quality, and evidence-based services at the right time to meet their unique and specific needs and to support long-term well-being.

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Mission: Work in Partnership with Local Communities to Protect the Vulnerable, Promote Strong and Economically Self-Sufficient Families, and Advance Personal and Family Recovery and Resiliency

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- Provides the option to utilize Title IV-E funding to provide up to 12 months of evidence-based mental health services, substance abuse treatment, and in-home parenting training to families at risk of entry into the child welfare system.
- Enhancement of the Department's child welfare information system for utilization of practice tools, an application to monitor ongoing prevention strategy progress, to capture decision making and periodic ongoing risk and/or safety monitoring four primary candidacy populations.

ACTION REQUIRED: Please share this memorandum with all child welfare staff, including all child protective investigators, CBCs, and CBC subcontracted providers.

CONTACT INFORMATION: If you have any questions regarding these procedures, please contact Monique McCaskill, In-Home Care Specialist at Monique.McCaskill@myffamilies.com or (850) 717-4710.

cc: Community Directors
Grainne O'Sullivan, Director of Child Welfare Legal Services
Barney Ray, Director of Revenue Management & Partner Compliance

Chapter 17

PREVENTION SERVICES

17-1. Purpose. This chapter provides guidance on implementing prevention services to promote, safeguard, and restore children and their families while building resilience to prevent entry into the child welfare system, specifically out-of-home care. The Department will use its Comprehensive Child Welfare Information System (CCWIS) practice tools and application to monitor ongoing prevention strategy progress and to capture decision making and periodic ongoing risk and/or safety monitoring to four primary candidacy populations.

17-2. Scope. This operating procedure applies to all child welfare professionals with the Department and the community-based networks that provide prevention services.

17-3. Authority. The following provides the legal authority of this chapter:

- a. Section 471(e), Social Security Act.
- b. Section 474, Social Security Act.
- c. Section 475, Social Security Act.
- d. Chapter [39](#), Florida Statutes (F.S.).
- e. Chapter [65C-30](#), Florida Administrative Code (F.A.C.).

17-4. Definitions.

a. "Candidate for foster care" for the purpose of this chapter means a child and youth formally assessed through community engagement or Florida Abuse Hotline (Hotline) reporting to be at imminent risk of entering foster care but who can remain safely in their home or in kinship placement with the evidence-based prevention services delivered by/through the community-based service networks or the Department. A child or youth may be at imminent risk of entering foster care based on alleged maltreatment and/or circumstances and characteristics of the family unit, individual parents, and/or children that may affect the parents' or guardian's ability to safely care for and nurture their children in their own home.

b. "Critical Juncture" means a circumstance that warrants a review and possible revision of the Prevention Plan as a result of, but not limited to, an emergency change in placement, little or no progress toward the Prevention Plan, and/or the generation of an abuse report. Families receiving case management services by a child welfare professional must follow the critical juncture requirements pursuant to CFOP 170-9, [Chapter 10](#), paragraph 10-8.

c. "Community-Based Network" means a group of stakeholders that include community-based care lead agencies (CBCs), county prevention agencies, and sub-contracted providers.

d. "Kinship Care" means the full-time care of a child placed by the parent in the home of a relative or fictive kin.

e. "Prevention Plan" means a service plan outlining the strategy and services that offer the highest likelihood of success of implemented services for the child and family.

f. "Risk" means the likelihood of future harm to a child.

g. "Safety" means the absence of an active danger threat within an assessed household/family.

h. "Title IV-E Prevention Service" means a mental health, substance abuse, or in-home parent skill-based program rated as evidence-based in the Title IV-E Prevention Services Clearinghouse, that is provided to children who are candidates for foster care, or a pregnant or parenting foster youth, and/or the parents/guardians/caregivers of children with the ability to claim Title IV-E reimbursement.

17-5. Description of Population served under Prevention Services.

a. Families served under community prevention supports to promote self-sufficiency through prevention services.

b. Families served by an agency and/or community through early intervention supports to enhance defined protective factors for families assessed with complex family conditions through prevention services.

c. Families served by agency crisis intervention to control active danger threats and achieve long-term behavioral change for families in crisis through prevention services.

d. Families that require agency and/or community supports to build family resilience with focused post-intervention and aftercare supports for families who have been in crisis through a wide array of prevention services.

e. The child welfare professional may consider circumstances or characteristics of the child, young adult, parent, or kinship caregiver when determining if children meet the criteria to receive prevention services which include, but not limited to:

(1) Experiencing or have experienced substance use or addiction;

(2) Experiencing or have experienced mental illness;

(3) Needing in-home parenting support and/or enhanced parental knowledge of child and youth development;

(4) Demonstrates limited capacity to function in parenting roles (i.e., interpersonal relationships that are characterized by a lack of coping, escalations to violence and/or power and control dynamics, intergenerational patterns of abuse and/or neglect);

(5) Parental support to address serious needs of a child related to the child's behavior or medical condition;

(6) Needing support for a developmental delay;

(7) Needing support for a physical or intellectual disability;

(8) Supporting adoption or guardianship arrangements that are at risk of disruption; and,

(9) Supporting parental resiliency and/or concrete resources (e.g., family stressors, poverty, etc).

17-6. Requirements for Title IV-E Prevention Services.

a. A child, youth, and/or young adult must be a candidate for foster care or be pregnant or currently parenting his or her own child to be eligible for the Title IV-E Prevention Service.

b. The four primary candidacy populations that are eligible under the Title IV-E Prevention Service are (see Attachment 1 to this chapter):

(1) Family Support Services (Prevention/Voluntary).

(a) Children ages 0-17 who are residing at home in the care of their parent(s) or legal guardian while their sibling is placed in foster care.

(b) Children ages 0-17 who were placed in permanent guardianship that was approved by the courts, which is intended to be permanent and self-sustaining through the transfer of decision-making with respect to the child relating to protection, education, care, and control of the person, custody of the person, and decision making on behalf of the child.

(c) Children who are deemed as safe but at risk of entering foster care or of future maltreatment as determined by the risk assessment completed by the child protective investigator, and who are in need of voluntary services aimed to increase protective capacities of the parents/guardians/caretakers.

(d) Parents or caregivers who contact community-based network providers or the Department requesting assistance to maintain their family unit.

(e) Children who are assessed by the community as having the identified family, parental, or individual circumstances or characteristics defined in paragraph 17-5e of this operating procedure.

(2) In-Home Judicial, In-Home Non-judicial, and Reunified (Post-Placement).

(a) Children ages 0-17 years old in the care of their parent(s) under in-home judicial services when it has been determined through a safety analysis that the child is unsafe and can remain in the home with safety management services while receiving services under the supervision of the court. Judicial oversight is needed for the family to engage in treatment services and to achieve the case plan outcome.

(b) Children ages 0-17 years of age in the care of their parent(s) under a non-judicial case which was implemented when the child was determined to be unsafe, a safety plan was required, and supervision is aimed at addressing the conditions that make the child unsafe.

(c) A family-made arrangement requiring a safety action initiated by the parent(s)/legal guardian(s) in response to present or impending danger. This safety action is a separation of the child and parent(s)/legal guardian(s) voluntarily and temporarily to a responsible adult of his/her choosing to provide daily care and supervision of the child. The parent(s) retain full legal responsibility, including decision-making authority and access to the child.

(d) Children ages 0-17 years of age who achieved reunification when circumstances and behaviors identified in the Conditions for Return have been met, and the safety of the child is managed using an in-home Safety Plan. Reunification is active as of the date the child returns to the home with an In-Home Safety Plan.

(3) Out-of-Home Care while Pregnant and Parenting.

(a) Minor placed in out-of-home care with their child. The minor must be age 17 or under, who has been removed from their own home, and is expecting or currently parenting his or her own child.

(b) Young adult in extended foster care (EFC) who is pregnant or currently parenting his or her own child.

(4) Adoption. Children ages 0-17 who were adopted after parental rights have been terminated.

c. When a child or youth has been identified as a candidate for foster care, the child welfare professional or community-based network provider is required to identify the prevention strategy that allows the child or youth to remain safely in their home.

(1) The safety of the child or youth shall be monitored through contact at least every 30 days during the service period.

(2) The child welfare professional shall utilize the Department's present and impending danger plan previously implemented to control danger threats for families who are unsafe and under non-judicial and judicial intervention services, and cases to which a family made arrangement resulted from an investigation.

d. A needs assessment for risk and safety will be conducted during face-to-face contact with the family and completion and review of the prevention plan.

e. The child welfare professional shall utilize the Family Functioning Assessment-Investigation (FFA-I) and Family Functioning Assessment-Ongoing (FFA-O) for the assessment of risk and safety when families are under non-judicial and judicial intervention services and family made arrangements resulting from an investigation.

f. A child, youth, or young adult shall require a prevention plan. The outcome of the assessment when determining risk and safety must be utilized as a guide to develop, amend, and terminate a prevention plan.

g. When it is determined that the child's risk for entering foster care remains high at 12-months despite the provision of services, the case must be scheduled for a multidisciplinary staffing pursuant to section [39.4022](#), F.S., to develop a plan to achieve child safety.

h. The Department is responsible for the oversight in determining if the child, youth, or young adult is a candidate for foster care.

i. The reason for closing a case for a family receiving Title IV-E prevention services must be documented in the Family Support Module. The progress update shall capture the reason for terminating services when families are under non-judicial and judicial intervention services and family made arrangements resulting from an investigation.

17-7. Prevention Plan.

a. Prevention plans are required when services are implemented to preserve the family unit through prevention services.

b. A prevention plan shall be developed for each child and family receiving prevention services, including those who are not linked with a prevention service that is rated on the Title IV-E Prevention Clearing House. The plan shall include the following:

(1) Name, age, and date of birth of each child or youth;

(2) Name of caregiver and all household members participating in the service;

(3) Identified prevention strategy that describes how the child will remain safely at home or in kinship care;

(4) Whether the child is identified as a candidate for foster care, or as a pregnant or parenting foster youth who is at imminent risk of entering foster care;

(5) List of prevention services provided to or on behalf of the child to ensure the success of the prevention strategy that allows for the preservation of the child or youth in their home environment; and,

(6) List of services provided to or on behalf of a youth to ensure that the youth is prepared or able to be a parent, in the case of a pregnant or parenting youth under the Department's care and supervision.

c. The prevention services for a pregnant or parenting youth or young adult under the Department's care and supervision must be incorporated in the dependency case plan to ensure the the youth or young adult is prepared or able to be a parent. The case plan must also incorporate the prevention strategy that was implemented to ensure the safety for any child born to the youth.

d. The prevention services for families who are unsafe and under non-judicial and judicial intervention must be incorporated in the case plan.

e. If at any time during the service period it has been determined through the needs assessment that the child is in need of removal from the home, the prevention plan must be reexamined to determine if additional services can prevent the removal. The outcome shall be documented in the Family Support Service module.

f. At any time the child or youth relocates to a new caregiver or guardian that did not result in the child initially being at imminent risk of entering into the Department's care or supervision, a redetermination shall be conducted to determine if the child is a candidate for foster care and the existing prevention plan shall be amended or a new prevention plan created based on the redetermination for the need of prevention services.

g. All efforts shall be made to develop the prevention plan with input from the child, child's parents or guardians, and any additional parties relevant to the family to include, but not limited to, relatives, teachers, probation officer, clergy, coaches, therapists, primary physician, psychologist, and/or psychiatrist.

h. Prevention services, as outlined in the prevention plan, may be provided for up to 12 months beginning from the date the child and family agreed to participate in a prevention program. For children and families participating in Title IV-E prevention services, the 12 months begins when the child is identified as a candidate for foster care or as a pregnant or parenting foster youth or young adult.

i. The child, youth, or young adult must receive a redetermination with the outcome documented in the child's prevention plan if services extend beyond 12 months.

17-8. Service Delivery and Local Service Array.

a. Efforts shall be made to refer children, young adults, and families to evidence-based services that utilize a trauma-informed approach and trauma-specific interventions to address trauma's consequences and facilitate healing.

b. The community-based network shall implement methods for quality assurance and monitoring to ensure that policies are followed, and services are of sufficient quality and effectiveness.

c. If services are provided under Title IV-E prevention services, all parties shall collaborate with the Department approved evaluator to monitor and ensure the program is implemented to its true fidelity.

d. The community-based network will develop and/or approve local policy for the implementation of prevention services that include:

- (1) The referral process(es);
- (2) Service descriptions, to include at least monthly face-to-face contact when receiving Title IV-E prevention services;
- (3) Duration of service; and,
- (4) Expectations or conditions for family participation.

e. Referrals to agencies in the community that typically involve a one-time only interaction with a family either through contact or referral (e.g., food pantry, clothing closet, etc.) are not considered prevention services, and documentation in the Family Support Module is not required.

17-9. Provider Outreach and Family Engagement.

a. The community-based network providers shall conduct follow-up outreach and engagement efforts with the family to collaboratively:

- (1) Review and discuss the family circumstances.
- (2) Discuss the current needs assessment.
- (3) Identify services to reduce risk.
- (4) Develop a prevention strategy to mitigate the identified barriers to the child(ren)'s future safety.
- (5) Establish a timeframe for the completion of the prevention plan.
- (6) Commit to follow and complete the prevention plan.

b. The family has a right to request closure of their case at any time.

c. A multidisciplinary team (MDT) staffing is required for all families receiving a Title IV-E prevention service and families referred for prevention services as a result of their actuarial risk assessment being high or very high when they no longer engage and participate, or if the family has been identified as not making progress in efforts to reduce risk. The outcome of the staffing must be documented in CCWIS in the Family Support Module.

(1) During the staffing, the potential need to generate an abuse or neglect report, unresolved service needs and benefits to the family, implement additional services, attempts to re-engage the family, and ongoing risk and safety will be discussed and the outcome documented in CCWIS.

(2) At a minimum, those individuals included in the staffing must be the participants outlined in section [39.4022\(4\)](#), F.S., the referring community-based network, service providers working with the family, and the individual responsible for case coordination. If they are no longer employed in

the same capacity or unable to participate despite reasonable notice, an individual who is knowledgeable regarding the family's prior history can suffice.

d. Human trafficking cases in which the family is no longer participating or making progress in efforts to reduce risk will also require a MDT staffing.

17-10. CCWIS Documentation.

a. Children who are deemed as safe but at risk of entering foster care or of future maltreatment as determined by the risk assessment or families receiving Title IV-E prevention services must be documented in CCWIS. The following information must be documented in CCWIS as indicated below:

(1) The begin date is the date the family agrees to engage in services. If the family receives Title IV-E prevention services, the begin date shall be the date the child was determined to be a candidate of foster care or as a pregnant or parenting foster youth.

(2) The end date will be the date the family completed services, services were declined by the family, or when the child enters out-of-home care.

(3) The Status Begin Comments narrative shall incorporate a summary of the reason for initiating the case.

(4) The prevention plan shall be created through the Family Support Plan Worksheet and must capture all required information outlined in paragraph 17-7.b. of this operating procedure.

(a) The name of the service provider shall be documented under the Outcomes Section of the prevention plan.

(b) Each service must be documented under the Service Category and Service Sub-Category, and indicate when a task was completed.

(5) The prevention strategy must be documented in the prevention plan.

b. The Needs Assessment shall be completed and updated based on subsequent assessments, at least every 90 days or at a critical juncture.

c. Rationale must also be included in an updated Needs Assessment Narrative when services extend beyond 12 months.

d. The Status Ending Comments narrative shall incorporate a summary of the reason for case closure to include, but not limited to:

(1) The family's refusal to begin or continue receiving services offered.

(2) Completion of successful interventions.

(3) If there is an MDT staffing, the outcome and efforts to re-engage the family.

(4) Whether the child entered foster care during the initial 12-month period and during the subsequent 12-month period.

(5) Whether the child continues to remain a candidate for foster care, if receiving Title IV-E prevention services.

(6) If there was a need to generate an abuse or neglect report.

e. Any additional assessments that the service provider refers the family to (such as mental health and substance abuse) shall be uploaded into the file cabinet.

f. Contact notes will summarize the essence of what happened during each contact as it relates specifically to the prevention service being provided.

g. A copy of the signed prevention plan must be uploaded into the file cabinet under the image category of "participant document" and image type of "family support prevention plan."

h. The Family Support Module in CCWIS will not be utilized to capture information related to unsafe families under non-judicial and judicial intervention with case management oversight. Documentation will be entered in the existing services case.

(1) The candidacy begin and end date will be captured under the placement module as the date the placement began and ended.

(2) The FFA-O and Progress Update will be used to capture the determination that the family is in need of an evidence-based service and include rationale for service delivery extending beyond 12 months.

(3) Ongoing periodic risk must be captured in the progress update.

(4) The prevention strategy must be documented in the case plan.

i. The Family Support Module in CCWIS will not be utilized to capture information related to Post Adoption Services. Documentation of Post Adoption Services will be entered on the Post Adoption Services page to include documentation pursuant to paragraph 17-10c of this operating procedure for Title IV-E prevention services for children who have been adopted as described in paragraph 17-6b(4) of this operating procedure. In addition to this chapter, all requirements under CFOP 170-12, [Chapter 9](#), paragraph 9-4 shall be followed.

Primary Candidacy Populations

Data Element	Family Support In-Home (Prevention/Voluntary)	In-Home Dependency and Reunified (Post-Placement)	Out of Home while Pregnant & Parenting	Adoption
Candidacy Begin Date	Family Support Begin Date	Living Arrangement Begin Date	Out of Home Placement + Pregnancy = 'Yes' Date	<i>Post-Adoption Service Coordination</i>
Candidacy End Date	Family Support End Date	Living Arrangement End Date	Out of Home Placement + Pregnancy = 'No' Date	<i>Post-Adoption Service Coordination</i>
Need Assessment for Risk, Safety, EBP	Needs Assessment	Family Functioning Assessment-Ongoing	Progress Update	Needs Assessment
Ongoing Periodic Risk & Safety	Needs Assessment	Progress Update	Progress Update	Needs Assessment
Prevention Strategy/Plan	Family Support Plan Worksheet	Case Plan Worksheet + Safety Plan	Case Plan Worksheet	Family Support Plan Worksheet
EBP w/in Plan	Service Sub-Category on Family Support Plan Worksheet	Service Sub-Category on Case Plan Worksheet	Service Sub-Category on Case Plan Worksheet	Service Sub-Category on Prevention Plan Worksheet
EBP service extended beyond 12 – months	Needs Assessment	Progress Update	Progress Update	Need Assessment
Entry into Foster Care w/in 12-month service delivery	Family Support Status Ending Comments + Out of Home Placement	Progress Update + Out of Home Placement	N/A	Post-Adoption Service Coordination + Out of Home Placement
Service Type Set-up	CBC creates with direction from DCF	CBC creates with direction from DCF	CBC creates with direction from DCF	OCW Adoption Program Specialist
Service Delivered	Service page	Service page	Service page	Service page (linked to Post-Adoption Services page)

Data Element	Family Support In-Home (Prevention/Voluntary)	In-Home Dependency and Reunified (Post-Placement)	Out of Home while Pregnant & Parenting	Adoption
Expenditure	Payment generated from Service page mapped to OCA	Payment generated from Service page mapped to OCA	Payment generated from Service page mapped to OCA	Payment generated from Service page mapped to OCA