



[The Family First Prevention Services Act \(FFPSA\)](#) was signed into law on February 9, 2018—ushering in significant changes to child welfare policy and practice. Through FFPSA states will now be eligible to claim Title IV-E reimbursement for prevention services. FFPSA also provides new incentives for placing children in family-based settings by limiting reimbursement and increasing the state's burden when placing children in congregate care settings. This bill is particularly important in reshaping how pregnant and parenting youth (PPY)—both mothers and fathers—in foster care are served and supported by child welfare systems in two ways. First, FFPSA includes PPY as categorically eligible population for prevention services as outlined in the bill. Second, FFPSA creates an opportunity for states to continue to receive reimbursement for PPY when they are not placed in a family-based setting but rather when they are in a program with their child that is targeted at meeting their needs as both an adolescent and parent. The FAQs below provide responses to the most commonly asked questions related to this population.

1. How does this law apply to PPY in foster care?

- PPY are candidates for prevention services as outlined in the bill. Their children do not have to be at imminent risk of entering care in order for them to receive these prevention services.
- For PPY who are not placed in a family-based setting, states will still be reimbursed for their placement if they are in a targeted program that supports them as both an adolescent and parent.

2. How is “candidate” and eligibility for prevention services defined for PPY?

- All PPY—including pregnant mothers and parenting mothers and fathers—are eligible for prevention services.
- If a PPY is in foster care, then they and their child are eligible for prevention services.
- The PPY's child does not have to be at imminent risk of entering foster care—or designated as a “candidate for foster care”—in order for the youth and their child to receive these prevention services.



3. What new prevention services for PPY are eligible for Title IV-E reimbursement under FFPSA?

- All prevention services must be evidence-based which is defined as well-supported, supported, or promising in order for the state to receive Title IV-E reimbursement.

- The prevention services must be either mental health, substance abuse, or in-home parent skill-based programs.

4. Do the services have to be specifically targeted for PPY?

- No. As long as the youth meet the eligibility requirements for an intervention then they can participate. For example, if a youth qualifies for a therapeutic intervention, that intervention does not need to be targeted for PPY.
- States should consider the specific needs of PPY when developing their continuum of prevention services to ensure there are programs that meet the specific and unique needs of PPY and support them in their roles as both an adolescent and parent.

5. Is there funding available to evaluate programs that are not currently evidence-based?

- Sort of. FFPSA does not include any additional dollars for evaluating programs that are not well-supported, supported, or promising. However, FFPSA does require states to maintain investments in prevention services through Maintenance of Efforts dollars which states could choose to use to evaluate programs that are not currently evidence-based.
- For any evidence-based prevention program implemented by the state, FFPSA requires them to use continuous quality improvement processes to ensure fidelity to any implemented program.

6. Are pregnancy prevention and sexual reproductive health services eligible for reimbursement?

- No, not on their own.
- The only services that are eligible for Title IV-E reimbursement are well-supported, supported, or promising mental health, substance abuse, or in-home parent skill-based programs.
- If or when a pregnancy prevention or sexual reproductive health component is part of the evidence-based mental health, substance abuse, or in-home parent



skill-based program, then it would be included in the reimbursable service.

7. If PPY accept services, do they need to have a separate prevention plan or can the services be included in their permanency case plan?

- PPY do not need to have a separate prevention plan. Any prevention services should be included in the youth's ongoing permanency case plan.

8. Do PPY have to accept prevention services?

- No. While they are eligible and should be offered services, PPY never have to accept services.
- If PPY do accept these services, the services should be included and noted in their ongoing case plan.
- States should put safeguards in place to ensure that a PPY's acceptance or refusal of services is not cause for heightened surveillance of the family.

9. Can PPY be placed in a family foster home?

- Yes! They can and should be when this is the best placement for youth and their child.
- PPY should be included in the decision-making process about identifying the best placement for themselves and their children.

10. Are PPY exempt from the Qualified Residential Treatment Program (QRTP) assessment requirements?

- Not exactly. FFPSA requires that children and youth be placed in a family-based foster home unless an assessment determines they need a higher level of care. Should a state believe that a PPY requires placement in a QRTP then the same assessment and review

protocols are required.

- If a PPY is placed with their child in a targeted PPY placement rather than in a family-based setting, the state will continue to receive Title IV-E reimbursement for their placement.

11. For non-custodial parents, how might their placement be impacted?

- There are no specific mandates for non-custodial parents within FFPSA.
- Non-custodial parents should also be placed in the least restrictive, most family like setting that meets their need. These placements should also support the youth as a parent including facilitating quality visitation. Their placement should not restrict their ability to be involved and visit with their child.

12. What changes within the Chafee Independence Program may effect PPY?

- In states that have extended foster care—either Title IV-E or state-funded—states can now extended Chafee services to youth through age 23.
- The age for determining eligibility has been lowered from 16 to 14 years old meaning that youth who are in care at age 14 or older are eligible for Chafee services.

13. Are there any other older youth services that are provided to PPY?

- Chafee eligible youth are now able to participate in the Chafee Educational Training Voucher (ETV) Program up to age 26.



We recognize this is not an exhaustive list of FAQs and states will continue to have questions moving forward. We will continue to update these FAQs as necessary. If your questions are not answered within this document, please feel free to reach out to Megan Martin (megan.martin@cssp.org) or Alexandra Citrin (alexandra.citrin@cssp.org).