

FAMILY CENTERED SERVICES AND SUPPORTS (FCSS) Questions and Answers Document for SFY 14

Autism Related Questions

Q: Can the FCSS money be used for an individual autism program for a 2 yr. old? The cost is shared with DD.

A: More information is needed regarding the mentioned "autism program". However, since the child is 2 yr. old, the child should be enrolled in the county HMG and have an IFSP. The county Board of DD would only be responsible if the Board signed off on the IFSP and agreed to provide some services and/or support. FCSS funding can ONLY be used for nonclinical services and supports and cannot be supplanted by other funding streams (e.g. Part C).

Q: One of our Service Coordination teams has requested funding for a three day autism training for a Mom to better understand her son's difficult behaviors. Currently, the family has a SC team brainstorming creative ideas for the family's supportive plan. This training is being HIGHLY recommended by the clinical workers on their team. After reviewing the guidelines of FCSS, I see that parent education can be supported by the funding but are we able to fund the hotel room for her stay at the training? It is too far to commute and the mother is one who will, more than likely, bring this training experience back to the county and train other parents with autistic children. The experience itself will not only benefit her child and family but other families as well.

A: Yes, this is an allowable expense. Seems like effective and creative planning and a good use of FCSS funding.

Child Care

Q: Can FCSS funding pay for summer child care for an aggressive MR/DD/MH kid so mother can continue to work out of the home once the school and school latch key programming is over in June?

A: Family work-related child care costs cannot be covered by FCSS funding according to federal regulation. However, if a child's functioning precludes the child from receiving regular child care at usual and customary rates, the difference between the average local cost of work related child care and the cost for managing the child's special needs (i.e. specialized childcare) may be paid by FCSS funds.

Help Me Grow

Q: Can FCSS funding support a service listed on an HMG child's IFSP?

A: The funds are intended for services and supports listed on a child/family plan that has been collaboratively developed thru the FCFC's formal service coordination (SC) process. FCFC SC occurs when a family or single agency/program (like HMG) refers to FCFC because case management or other supports by a single system/program are unable to meet the individual child/family needs. It is the FCFC cross system team planning/ decision process, plus services listed on the plan developed thru that FCFC SC process, that would be supported by FCSS \$.

High Fidelity Wrap Around

Q: Does HFWA qualify as a non-clinical in-home visit?

A: No, HFWA is not considered to be a non-clinical in-home visit. HFWA is an effective model of service coordination which is an allowable expense and can be tracked under the service coordination category on the semi-annual and annual FCSS report. HFWA service coordinators can be reimbursed for face-to-face service coordination visits using a unit rate. Calculation of the unit rate guidance can be found in the FCSS Guidance available on our website, <http://fcf.ohio.gov>. Click on Initiatives, then on Systems of Care (FCSS) on the drop down list.

Out-of-Home Placement

Q: Can we mix and match funds for a family with kids in the home and in placement?

A: Possibly yes, if the child(ren) remaining in the home qualify for FCFC service coordination regardless of the status of the child(ren) placed in an out-of-home setting. In other words, FCSS funds cannot be used to support a family when the only child qualifying for FCFC service coordination is placed out of the home.

Q: If a child goes into placement and we are still working with the family, can we count face to face time. I thought no since the child is not eligible for FCSS funding.

A: If a child goes into placement, no FCSS funds can be used to support the child or family during this time, including face-to-face SC time working with the family. However, we would encourage counties to continue to work with and support the child, family and providers during this time through service coordination in order to improve outcomes while in placement, decrease the child's time spent in placement, and improve transition outcomes when it is time for the child to return home.

Parent Advocacy

Q: Are families eligible for a PAC advocate ONLY while they are active in FCFC Service Coordination? Once a case has closed, for instance, does that end the family's eligibility for a PAC advocate? If the family needs ongoing parent advocacy for a system issue, such as school, is it best practice to keep the case open with less frequent meetings to maintain eligibility?

A: To access PAC services supported through state FCSS funding a family must be formally engaged in the FCFC SC process. Once a SC family's case is closed, PAC will provide a transition period of up to 6 weeks in order to connect the family with other resources. The primary role of PAC is to advocate/support families during service coordination related meetings and not system specific issues. If a parent has system specific issues they should access advocacy resources designed to help specifically within those systems, such as OCECD, school parent mentors where available, NAMI, etc. Please note that FCSS funds cannot be used for educational purposes. PAC advocates are NOT able to serve in the capacity of a school parent mentor role. A PAC advocate may provide support (PAC support, NOT serving as a school mentor) to families at IEP meetings and/or court hearings, if, and only if all of the following exist:

- 1) the family is formally involved in the FCFC SC process, AND

- 2) the family/team is requesting/needng add'l support at an IEP meeting, and/or court hearing, AND
- 3) the family/team believes that PAC support at IEP meeting and/or court hearing will benefit/promote the goals listed on the family's SC Plan.

Programming Costs

Q: Can FCSS pay for the case management portion of IHBT?

A: No, FCSS funds cannot pay for clinical IHBT or any other clinical services.

Q: Can FCSS funds pay for psych evaluations or MH assessments to determine the service needs of children?

A: No, FCSS funds cannot pay for psych evaluations, MH assessments of any other clinical services.

Q: Can FCSS funds be used to pay for a court ordered parenting class that Mom needs to take in order to regain custody of her children. The children are currently in the custody of their Grandmother and there is no Children Services involvement. Both mother and grandmother would like to see custody of the child returned to the mother.

A: Yes, this is an allowable FCSS expense. Based on the definition of out-of-home placement in the FCSS Guidelines, out-of-home placement does not include kinship care unless an agency also receives temporary custody.

Provider Related Questions:

Q: How do non-governmental providers calculate what they may charge for their services and supports when they are identified on an Individual Family Service Coordination Plan and provided to a family in FCFC service coordination when that family and the services/supports meet the criteria established to use FCSS funding?

A: When a non-governmental provider provides services or supports to a family in FCFC service coordination where the service or support has been identified on the family's IFSCP, the provider may charge the usual and customary uniform-fee-for service that it would charge to any other individual family that was receiving that same service or support, as long as the family and the service/support meet the criteria established for FCSS funding.

Q: FCSS Guidance states that FCSS funds cannot pay for treatment or clinical services. It is okay for a licensed professional/clinician to provide family support if the service they are providing is not considered clinical treatment or therapy?

A: Yes, in general it is okay for a licensed professional to provide family support services that are not considered clinical treatment or therapy. However, if the provider's special skills are needed due to the presenting issues, then the service may be considered therapeutic. Please consult your OFCF regional coordinator on a case by case basis when there are questions about whether or not a service is considered therapeutic.

Respite/Mentors

Q: Can the county pay kinship caregivers for respite?

A: This is a local decision. The county should consider liability issues and/or the rigor of assuring that it is a safe respite placement.

Q: If we are providing respite using FCSS funds can we cover the cost of siblings as well as the child with the identified need?

A: Needed respite services can be provided to the family unit, including siblings, if the respite services provided are consistent with the FCSS guidance document, its definition of respite, and the family's written IFSCP.

Q: Can FCSS funds be used to pay for background checks for a family member or friend to serve as a mentor and/or respite provider?

A: Yes, this is an allowable FCSS expense. However, it is recommended that the county first talk with the local prosecutor about potential liability issues and the development of a liability waiver form that the parents can sign.

Service Coordination Related Questions

Q: We are struggling with the actual cost vs. the unit rate estimate. There is a concern about overestimating and owing money at the end of year when we reconcile. Conversely, there is a concern of underestimating and losing money at the end of the year when we reconcile.

A: First, counties are not required to reconcile actual costs vs. the unit rate. Secondly, some type of logical methodology needs to be used to determine the unit rate, such as time studies, review of activities and time historically spent on the life of an average case, etc. The unit rate should be viewed from a managed care perspective in that some cases will involve more time and other cases less time than the average unit rate. If a county later determines that the unit rate does not accurately reflect costs, adjustments could be made to the unit rate. However, it is recommended that counties maintain, as much as possible, a defined unit rate for the FY so costs can be justified and readjustments can be made for the following FY. Justification of how the calculations to determine the unit rate and/or an adjusted unit rate should be provided to the council administrative agent.

Q: Can the county have more than one unit rate? For example, what if the county has multiple providers, or the salaries of service coordinators vary?

A: Each provider shall establish a unit rate of service. If a provider has several staff providing services, an average of their salaries shall be used to establish the basis of the unit rate. Each provider may establish its own unit rate.

Q: If an FCFC Service Coordinator goes to a Family Team meeting, however, the family does not show up for the meeting, can SC bill the unit rate for this meeting, even though the parent was a no show? This is a face-to-face meeting on behalf of the family (and the prep going into the meeting), even though it's not a 'face-to-face' with the actual family.

A: The family needs to be present in order to bill the face-to-face unit rate. The meeting will need to be rescheduled for a time when the family is able to participate. The unit rate, once it is billed, would include the reimbursement for preparation time. FCFC Service coordination is a voluntary, family driven process and, therefore, needs to include active family participation.

Q: Do all agencies within a single county providing service coordination under the council service coordination mechanism have to use the same Individualized Family Plan form?

A: Yes.

Q: Can initial cluster meetings and engagement activities held before the family has made a decision on whether or not to become involved in service coordination be charged against the FCSS dollars? Would it be limited to only those families who decide to become involved in ongoing service coordination, or, if a family is wait-listed, only after they are actually enrolled in SC?

A: FCSS funding can only be used for families who are formally enrolled and actively engaged in the service coordination process. Time spent on intake duties should be included in the development of a unit rate that can then be charged for only those families enrolled in service coordination process and only for face-to-face time with those SC families.

Tracking FCFC SC Families

Q: On the tracking sheet for FCSS, it asks for the number of children that had certain needs at intake. It includes unruly and delinquent. Do you want them counted only if they are adjudicated as such, or should we just use our own determination as to whether they are unruly or delinquent?

A: Count the child if there is formal or informal juvenile court involvement for unruly and/or delinquency behavior.

Q: If a child has an IEP should we count them as Special Education on the tracking spreadsheet?

A: Yes.

Q: What standard do we use for poverty on the tracking spreadsheet? (100% of US poverty guidelines)? For our local TANF/PRC contract, we use 150%?

A: For statewide consistency counties need to use 100% of the FPL. It is important to note that FCSS (Title IV-B) funds have NO income eligibility requirements. Poverty is just another area of family need that is being tracked.

Q: Question #3 on the semi-annual and annual reports is subjective. For example: How do we determine if a family is in poverty? Do we collect pay stubs to verify if they are under 100% of the poverty level? And, how do we determine if there is child abuse (ie. reported, substantiated)? It seems the data will be skewed if these things are not well defined.

A: Poverty is not an eligibility determination, so councils are not expected to verify financial status. We are simply asking for a quick report of presenting needs of the child at entry to

council service coordination. This information will be used to assist the state in identifying service needs and priorities. However, as stated above, for statewide consistency, counties are asked to use 100% of the Federal Poverty Level as a general guideline. For child abuse, you need to count the child if there is formal or informal involvement of the Child Protective Services, including Alternative Response.

Q: Regarding a question on the FCSS tracking spreadsheet: if a child is in placement for a few days in August we 'count' that in August. When home again, the child continues to get service coordination (I know we can't bill FCSS for the time the child was in placement) and later, the child is placed out of home again in October, do we count him/her again as an out of home placement for October?

A: Unless the family is officially closed out of service coordination and officially re-opened (i.e. re-assessed, new family plan, etc.), count the placement only once and not the # of times a child is placed while actively engaged in the service coordination process.

Q: On the tracking spreadsheet the questions are child-focused. Since families are often the ones with the greatest needs and not necessarily the child (ie. parent with substance abuse issues), it seems that it would be important to also gather the family needs.

A: This may be desired data for the future, however at this time we are only asking for you to report the child's needs. Service coordination is determined by the child having multi-systemic needs. If the child does not have multi-systemic needs, then they would not qualify for the use of FCSS funds. However, in the example that you give, a child living in a home with a parent with substance abuse issues, the child would be impacted by the parent's substance abuse and thus the substance abuse of the parent becomes a need to be identified as it impacts the child. A similar situation happens when parents are unable to provide for their children financially, thus poverty becomes an issue for the child.

Youth aged 18 years or older

Q: What if an 18 to 22 year old is married? Can we still pay for services for them with FCSS funding?

A: These funds are to be used for families accepted into the SC process. Your county SC Mechanism should clearly describe the age eligibility requirements to qualify for service coordination in your county. The FCSS funds may be used for children and youth who are formally enrolled in your county SC process with a family team and a family plan up to the age of 22.

Q: Can FCSS funds be used to help off-set college dorm and school supplies and toiletries?

A: No, this would fit under the non-allowable category of shelter/household expenses.

Suggested resources for eligible youth include:

1) Post Emancipation Services: Youth who reached their 18th birthday and then Child Protective Service custody was terminated may qualify for post emancipation services through the CSB in the youths current county of residence.

2) Educational Training Vouchers (ETVs): to assist with school-related expenses. In order to qualify for ETV funds the student must meet one of the following criteria.

A. Students must fall into one of these categories:

1. Their foster care case will be closed on or after, their 18th birthday; or they were in foster care on their 18th birthday and aged out of care at that time.
2. They are in foster care and are age 17 or older, and have earned a GED, Vocational Certificate, or have a High School diploma.
3. They were adopted from foster care and the adoption finalized on or after their 16th birthday.

B. They are enrolled in a post-secondary program at a Title IV accredited college, university, technical or vocational school. To remain eligible for ETV funding, they must show progress towards a degree or certificate.

If you have any questions about ETV, please contact Elaine Hall at 614-752-0080 or Elaine.Early-Hall@jfs.ohio.gov

Transportation

Q: Can FCSS funds be used to rent a medically equipped van, purchase gasoline for the van and pay for hotel costs for a family traveling on vacation with 2 children who are wheelchair bound?

A: No, this would not be an allowable FCSS expense.

Q: We have a family who is attempting to get out of an abusive relationship. The mother and child are temporarily housed at a domestic violence shelter. The shelter is across county lines. Can we use FCSS to assist the shelter in paying for transportation costs to and from school and/or other activities?

A: If it is not the school's responsibility to cover transportation costs, then you can use FCSS funds. Transportation is an allowable FCSS expenditure.

Q: Can FCSS funding be used for car repairs?

A: No, this is not an allowable FCSS expense. Suggest checking with county PRC and/or WIA programming for assistance.

Hospitalized Child and Temporary Lodging

Q: Can FCSS funds be used to pay for lodging while their child is hospitalized? There is a nearby hotel that is used for family members of hospitalized children. The per diem is \$30.00.

A: Yes. FCSS funds can support short term lodging when a child is hospitalized, provided they have first exhausted other resources, such as Ronald McDonald house or other hospital type homes that may be available at no cost.

Q: Can FCSS funds be used to provide services and supports to families when a child is hospitalized in a medical or psychiatric hospital?

A: Yes, FCSS funds can be used to support a family whose child has been hospitalized in a medical or psychiatric hospital, as they are not considered out-of-home placements as long as the child's parent/guardian has custody (i.e., not in the custody of a PCSA). The FCSS funds can pay for services and supports for the family while the child is in a medical or psychiatric hospital, including FCFC service coordination. The FCSS funds cannot be used to pay for the child's medical or psychiatric hospitalization expenses, as FCSS funds are not allowable for medical/clinical services.

Safety Equipment/Supplies

Q: Can FCSS funds be used to help purchase a ceiling lift and track system in the home of a youth with multiple and serious medical conditions?

A: You must first check to see if this is an expense covered by the family's insurance (possibly under the durable medical equipment portion of the policy). If it is not covered, then yes, this would be considered safety and adaptive equipment and therefore an allowable FCSS expense. Also, suggest checking with the county Board of Developmental Disabilities to see if Family Support Funds can be accessed.

Q: Can we use FCSS funding to purchase materials for a safety fence to be built around the yard of a family with a special needs child that requires a secured area?

A: Yes, this is an allowable FCSS expense.

Q: Can FCSS funds be used to purchase a crib and wedge pillow for a child with medical issues? Would these items qualify under the category of safety and adaptive equipment?

A: No, a regular crib and wedge pillow are not considered to be safety and/or adaptive equipment. They are considered to be household items and therefore an un-allowable FCSS expense.

Q: Can FCSS funds be used to purchase diapers for a handicapped youth?

A: Yes, FCSS funds can be used for this purpose if it is the funding of last resort (i.e. all other funds, such as Family Support dollars through the local DD boards, have been exhausted).

Q: Can FCSS funds be used to pay for the eradication of lice, bed bugs and/or black mold?

A: Other resources, such as the local Health Departments, must first be explored. If no other funding source is available, then FCSS may be used to pay for bug infestation and/or black mold eradication. However, it is recommended that the county consider the future need for this service and the county's capacity to meet this need. For example, the county should consider how many families could potentially request and qualify for this services, and consider whether or not this is the best use of limited FCSS funding. If the county decides to cover these type of

expenses, it is strongly recommended that they county set a per child budget, so as to serve as many children/families as possible.

Q: I have a family with a very young child with a condition that is generally fatal, the heating/air conditioning unit in their home went out. Can we help with the costs since, due to her medical issues, she needs to stay warm in the winter.

A: No, unfortunately this is considered to be a household expense regardless of the circumstances. It is recommended that you explore funding through your local health district, Prevention Retention & Contingency funding through the Job & Family Services, or Family Support Funds if applicable at the Developmental Disabilities office.

Q: A home has tested positive for lead on both the inside and outside of the property. One of the children has been diagnosed with Pica and has been hospitalized due to extremely high lead test results. The family has been working with regional planning. Together, they have taken the necessary steps to make the inside of the home safe. Regional planning did not receive expected funding this year and cannot help with wrapping the outside of the home to contain the peeling paint chips. Since the child has Pica, could we use FCSS funds to pay for siding as a safety equipment issue?

A: No, unfortunately this is considered to be a household expense regardless of the circumstances. It is recommended that you explore funding through your local health district, Prevention Retention & Contingency funding through the Job & Family Services, or Family Support Funds if applicable at the Developmental Disabilities office.

Legal

Q: Can FCSS funds be used to pay for Guardian Ad Litem fees?

A: No. FCSS funds cannot be used for any legal fees or court related costs.

Q: Can FCSS funds be used to help parents pay for the filing fees when pursuing unruly charges?

A: No. FCSS funds cannot be used for any legal fees or court related costs.

Nutrition

Q: Can FCSS funds purchase dietary supplements?

A: No, this is not an allowable FCSS expense. Suggest that the county explore WIC, Medicaid Waiver Programs, BCMH and/or County Board DD Family Support Funds to cover the cost of dietary supplements.

Education

Q: Can FCSS funds help cover the cost of GED testing?

A: No, FCSS funds cannot be used for any education related expenses. Suggest checking with county PRC and/or WIA programming for assistance.

Q: Can driver's education classes be paid to assist teenager in getting a job to help alleviate stress in the home?

A: Yes, this is an allowable FCSS expense. However, recommend first checking with WIA about covering this expense.

Conferences

Q: Can FCSS funds pay for a parent's conference related expenses (i.e. registration fees, transportation and accommodations)?

A: Yes, if the conference meets a family need identified on the family's IFSCP. Conference related expenses such as registration and accommodations would fall under the FCSS allowable category of "parent education". Transportation is also an allowable FCSS expense. That said, parents must be encouraged to apply for any parent stipends offered by the conference sponsor(s).

Q: We have a parent who would like to attend an out-of-state conference related to her child's specific diagnosis. Can FCSS funds pay for her out-of-state conference related expenses (i.e., registration fees, transportation and accommodations)?

A: Generally, it is allowable if the conference meets a family need identified on the family's IFSCP AND when such opportunities are not locally available. However, please consult your OFCF regional coordinator on a case by case basis.

Miscellaneous

Q: I know that school fees are not an allowable expense and it outlines summer school, credit recovery and various other academic expenses. However, with pay to play being more the norm, can FCSS money be used to pay for athletic fees or uniforms?

A: Yes, as long as these are for extra-curricular social/recreational activities that have been identified by the council service coordination individual family team and written into the Individual Family Service Coordination Plan. NOTE - A waiver, by the school district, of the fee would be the first route to take. Also, in some cases there have been funds set up by the Parents Athletic or Band Boosters organizations and/or from community donations to cover the cost of the fees for children in families that cannot afford them. All of these options should be explored before paying for these fees with FCSS funds.

- extra-curricular- defined as something above what the school is required to provide for children in their public education.

Q: Can FCSS funds be used to purchase copies of birth certificates?

A: No, this is not an allowable FCSS expenditure. Your local JFS may be able to provide copies at no cost to the family.

Q: Can FCSS funding be used to purchase an Oximeter and a scale to measure medicine? The Oximeter is covered by the family's medical insurance, but only once the family's deductible is met. The family cannot afford to pay out of pocket for the Oximeter.

A: The Oximeter is covered by medical insurance and considered a medical cost and therefore is a non-allowable FCSS expense. The scale is not covered by medical insurance and is not considered a medical cost and is therefore allowable.

Q: Can FCSS funding be used to purchase a membership at the local YMCA that would be used exclusively by those children who are currently in Service Coordination and who are currently receiving mentoring services that are being paid for by FCSS dollars. The benefit to the county is that we can allow those children to enjoy the activities offered by the YMCA with their mentor, without purchasing individual memberships. It would be a huge cost savings.

A: Yes, this is an allowable expense that is creative and makes efficient use of limited resources.

Q: Are prescription eye-glasses an allowable FCSS expense?

A: No, this is considered a medical expense and therefore unallowable. Suggest checking with the Lions Club for assistance with this cost.

Q: We are providing SC for a deaf couple. May FCSS dollars be used to pay for interpreter services for SC meetings?

A: Yes, this is an allowable FCSS expense.

Q: If an electronic device such as a computer, DVD, e-book, I-Pad, I-Pod, etc. are listed as a support on the family's IFSCP; can FCSS funds be used to purchase the equipment?

A: Since this is a general question and not related to a specific family situation, the answer to this question is maybe. It depends on the purpose for which the device is purchased as stated in the individual family service coordination plan, and how the purpose is aligned with the goals, priorities and restrictions related to the use of the FCSS funds. However, the family team should consider whether or not this is the only option available that would work to support a family's need. The county should understand that such purchases, when made to improve a child's educational outcomes, would not be allowable. When a county is considering such a purchase, they should request a review of the purpose of the purchase. An explanation of the family circumstances and how such a device would address a family's need should be included with the request.

Q: Can FCSS funds be used to install a court ordered land-line telephone into a home for electronic monitoring through the court?

A: Yes, if it is equipment that is needed to keep the child from being institutionalized and to keep the child safe in the community. However, FCSS funding can only be used to purchase the land line. It cannot purchase other phone services such as caller I.D., 3-way calling, etc. Also, suggest checking with juvenile court about utilizing Reclaim dollars to cover this expense.

Q: Are there any rules or limitations on using FCSS funds for an undocumented person who is in Service Coordination?

A: States are not required to verify the citizenship or immigration status of individuals receiving child welfare services funded under title IV-B, subparts 1 and 2, because those services do not meet the Federal definition of Federal public benefit (see 63 Fed. Reg. 41657 (August 4, 1998)). Therefore, child welfare services are not subject to the verification requirements at section 432 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA). Thus, there are not limitations for an undocumented person.

Q: Can FCSS funds be used to purchase a high chair for a family who desperately needs one?

A: No, this item would be considered a household expense and non-allowable. However, if it is a special high chair for someone with special needs it could be allowable and considered adaptive equipment. In this case, other options must be explored first before using FCSS funding (e.g. BCMH, DD Family Support Funds).