FFPSA Provider Communication
December 2018

Update on Montana’s Implementation of Family First Prevention Services Act: Ensuring Successful Statewide Service Delivery

Dear Colleagues,

As you know, the Family First Prevention Services Act (FFPSA), signed into law earlier this year, dramatically changes how child welfare agencies can utilize Title IV-E of the Social Security Act federal funding. Historically, IV-E funding could only be used after a child came into the foster care system. Family First Prevention Services Act allows the IV-E federal funding match to support specific evidence-based prevention services. The Act seeks to reduce the number of children in foster care, limit the use of congregate care, and increase access to substance abuse and mental health services. States have the ability to access IV-E funding for prevention when all required elements of the law are met. Implementation of the new law must occur by October 2021.

I’m writing to let you know that DPHHS is focused on ensuring a successful statewide implementation and has, like the majority of states, decided not to rush into implementation. DPHHS will work closely with community stakeholders and providers as we anticipate implementation by October 2021 or earlier. As many of you heard in our stakeholder session, all states continue to wait for federal guidance regarding which evidence-based services will qualify for federal reimbursement under the new legislation.

The following provisions within FFPSA will take time to successfully implement:

1) 472(k)(1)(B) and 475A(c) of the Act: Qualified Residential Treatment Programs (QRTPs)
2) 472(k)(2) of the Act: Limitations on Title IV-E foster care maintenance payments for placements that are not foster family homes

Moving forward, DPPHS and the UM Center for Children and Families and Workforce Development will facilitate stakeholder work groups to increase community readiness and successful service delivery. We are grateful to the Montana Healthcare Foundation for providing grant funding for that important work. Family First will impact every Division in the Department. We have convened an internal Department stakeholder group & I have requested a morning block during the Department’s appropriation subcommittee to discuss Family First. We will send more details as the subcommittee date is confirmed.

Thank you for the work you do every day to serve Montana kids and families. We look forward to working with you as we implement this important Act.

Thank you,
Sheila Hogan
Director, Montana Department of Public Health and Human Services