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# **Family First Prevention Services Act:**

Prevention Services FAQ

07/29/2025

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## Overview of the Family First Prevention Services Act (FFPSA)

The Family First Prevention Services Act (FFPSA) of 2018 is federal legislation that changes the way child protection services are provided in Minnesota. The act, known as Family First or FFPSA, gives states the ability to leverage federal funding to provide prevention services to children at risk of out-of-home placement. Family First also limits the use of residential or congregate care programs (residential treatment programs, group homes and foster residences) to children who cannot receive adequate or appropriate services in their community with family or in a family foster home. Placement requirements for residential programs went into effect Sept. 30, 2021, and prevention services are currently being implemented statewide.

FFPSA provides Title IV-E reimbursement for the state, counties and Initiative Tribes for federally approved prevention services for children at imminent risk of out-of-home placement and their caregivers. Minnesota's Five-Year Prevention Services Plan (prevention plan) was federally approved in January 2023.

For more information on both residential requirements and prevention services in Minnesota, visit the following:

- Partner Link [Family First Prevention Services Act \(state.mn.us\)](https://state.mn.us)
- [FFPSA Residential Services FAQ](#)
- [Minnesota's Five-Year Prevention Plan](#).

## Section 1: Minnesota's Family First Prevention Services Act (FFPSA) Title IV-E Five-year Prevention Services Plan development and implementation

### 1.1 What is Minnesota's FFPSA Title IV-E Five-year Prevention Services Plan?

FFPSA provides eligible states and Tribes the opportunity to receive Title IV-E reimbursement for the costs of approved prevention services to prevent out-of-home placement of children involved in child protection. To be eligible, states must submit a Title IV-E Five-year Prevention Services Plan to the Children's Bureau describing which approved prevention services will be provided, who will be eligible to receive those services and other key components. The plan must describe how the state will provide oversight for the five-year plan, each specific service and of the children receiving services.

Each service claimed for reimbursement must have a plan for fidelity monitoring, continuous quality improvement, and a "well-designed and rigorous evaluation" that is described in the five-year plan. An evaluation waiver may be requested for services rated as well-supported by the Title IV-E Prevention Services Clearinghouse.

Other key components include how the state will monitor and oversee the safety of children who are receiving services, how the state is consulting and coordinating with the appropriate agencies, child welfare workforce training and support, prevention services caseload oversight, and assurances on trauma-informed delivery and prevention program data reporting.

A five-year plan must be submitted for each five-year period. A state may resubmit a plan at any point, such as to add services.

### **1.2 Can a county or Tribal agency submit its own Title IV-E prevention program plan?**

Each state may submit one Title IV-E Prevention Services Plan. Tribes with direct Title IV-E agreements with the federal government may submit their own Title IV-E prevention program plan. Currently, there are no Tribes in Minnesota with direct Title IV-E agreements with the federal government.

### **1.3 How did the Minnesota Department of Human Services choose services to include in its Family First Prevention Services Title IV-E Five-year Prevention Plan?**

A subworkgroup was formed to develop service array recommendations for the initial submission of the state prevention plan. Subworkgroup members included state and county partners, community agencies, parent consultants and some Tribal participation. A separate Tribal consultation process occurred for the selection of the initial services. Services were identified based on what is available in Minnesota, and what would meet the needs of eligible children and families and the service requirements of FFPSA.

After initial implementation of the first two services, the department plans to work with local social service agencies, Tribal partners, a variety of community and national partners to expand the services available on Minnesota's Five-Year Plan. This includes increasing the services available across the state, and development and access to culturally responsive services.

See the [Family First Prevention Services Act requirements](#).

## **Section 2: Implementation of Family First Prevention Services Act in Minnesota**

### **2.1 Who is responsible for implementing FFPSA in Minnesota?**

The Minnesota Department of Children, Youth, and Families, Child Safety and Permanency Administration is the state Title IV-E agency responsible for the implementation and oversight of Minnesota's Title IV-E five-year prevention services plan.

### **2.2 What is the timeline for implementation of Minnesota's FFPSA Title IV-E Five-year Prevention Services Plan?**

Minnesota's FFPSA Title IV-E Five-year Prevention Services Plan was federally approved in January 2023. The department, in collaboration with counties and Tribes, has been implementing components of the prevention plan, including recent statewide training for Motivational Interviewing. The department continues to prepare for implementation, including developing necessary changes to the Social Service Information System (SSIS) to build the infrastructure for program and fiscal reporting and claiming for prevention services. Implementation of the different components for prevention services has occurred over several SSIS releases. Final release for prevention services is planned for SSIS Release 25.4 (December 2025).

### **2.3 How will counties be impacted by Minnesota's FFPSA Five-year Title IV-E Prevention Services Plan?**

County agencies will receive training and support from the department to provide approved prevention services to ensure they meet federal requirements. Once all requirements have been met, including documentation of prevention services candidacy and case plan, the county will be able to submit claims for federal Title IV-E reimbursement at a rate of 50% for eligible costs of approved services in Minnesota's FFPSA Title IV-E Five-year

Prevention Services Plan and approved costs of administration and training related to the Title IV-E prevention plan.

#### **2.4 How will Tribes in Minnesota be impacted by Minnesota’s FFPSA Title IV-E Five-year Prevention Services Plan?**

Tribes participating in Minnesota’s American Indian Child Welfare Initiative follow the process and requirements that apply to the Title IV-E prevention plan including prevention services candidacy, case plan, documentation and reporting in order to be to submit claims for federal Title IV-E reimbursement at a rate of 50% for eligible costs of approved services in Minnesota’s FFPSA Title IV-E Five-year Prevention Services Plan and approved costs of administration and training related to the Title IV-E prevention plan. Tribal agencies that do not participate in the initiative can receive training and support from the department to implement the approved prevention services.

#### **2.5 Can agencies claim Child Welfare Targeted Case Management (CW-TCM) and Title IV-E prevention services at the same time?**

The department has defined the difference between Child Welfare Targeted Case Management (CW-TCM) services and Title IV-E prevention services, particularly for Motivational Interviewing. The definition will allow claiming of CW-TCM and Title IV-E prevention services in the same workgroup. However, agencies may not claim Title IV-E Prevention Services and CW-TCM for the same activity but may claim both on the same date/time if there is clear distinction between the CW-TCM visit and the prevention services provided in separate time notes.

The department is working internally to understand proposed future changes (e.g., move from a monthly unit to 15-minute unit) to CW-TCM and the potential impact on Title IV-E prevention services claiming. Additionally, the department has consulted with federal partners.

#### **2.6 How will the department support training to launch Motivational Interviewing and Parents as Teachers?**

The department, in partnership with the Minnesota Child Welfare Training Academy (MNCWTA) staff, is coordinating and providing training and technical assistance. Topics will be integrated into current training or available independently to include prevention services, eligibility determination, data requirements, claiming for services and other topics necessary for implementation. Additionally, the department is working in partnership with the MNCWTA and the Center for Practice Transformation at the University of Minnesota to train the child welfare workforce in Motivational Interviewing.

#### **2.7 What will need to be documented in the Social Service Information System (SSIS)?**

SSIS is the federal comprehensive child welfare information system for documenting and reporting prevention services. Child-specific data is required for each child who receives Title IV-E placement prevention services and will be collected and reported through SSIS. At a minimum, this will include:

- An encrypted child identification number
- Child’s date of birth
- Child’s sex, race and ethnicity
- Pregnant or parenting youth in foster care status
- A service plan with child specific prevention services outlined
- Type of service/s

- Service/s start date
- Cost of service/s
- Service/s end date
- Foster care status
- Months from the protection plan start date
- Foster care entry date (if applicable).

For more information on what is needed to document in SSIS view the Title IV-E Prevention Services Claiming Policy guide here: [Title IV-E Prevention Services Claiming Policy Guide](#)**Section 3: Eligibility**

### **3.1 Who is eligible to receive Title IV-E prevention services under the Family First Prevention Services Act (FFPSA) in Minnesota?**

Candidates for Title IV-E prevention services are children at imminent risk of removal from home but who can remain safely at home or with kin if they and their parents or kin caregivers are provided Title IV-E prevention services to prevent removal. A candidate for foster care is defined as a child who is at “imminent risk of entering foster care” and was further defined in Minnesota’s Family First Prevention Services Act Title IV-E Five-year Prevention Plan. To be considered a candidate, and at imminent risk of foster care, children must be alleged victims in a screened-in child protection report, have an open child protection case management workgroup, and meet at least one of the following criteria:

- A previous out-of-home placement
- An identified need for child protective services at case closure of a child protection investigation or assessment
- Was an alleged victim in a previous maltreatment report that closed within the previous 12 months
- Has allegations involving caregiver substance abuse or other documented indicators of substance abuse
- Has child behavioral or mental health concerns
- Pregnant or parenting youth in foster care.

Additionally, an eligibility process, a child-specific prevention services plan, and ongoing safety and risk assessment must be established and documented for each eligible candidate. In Minnesota, the Structured Decision Making (SDM) tools are used for ongoing safety and risk assessment.

### **3.2 Can a child receive Title IV-E prevention services in an out-of-home placement?**

Only pregnant or parenting youth in foster care are eligible to receive Title IV-E prevention services. No other candidates for Title IV-E prevention services can be in an out-of-home placement.

### **3.3 Are prevention services candidates and foster care candidates the same?**

No. Although both programs serve children at imminent risk of entering foster care, prevention services candidates are receiving services that are included in the Five-year Prevention Services Plan while foster care candidates receive broader services. Another difference is the inclusion of pregnant and parenting youth in foster care who are eligible for prevention services under FFPSA. Although Title IV-E placement, prevention and traditional Title IV-E foster care candidacy may overlap, they cannot be claimed simultaneously. Claiming decisions should be made on a case-by-case basis.

Unlike foster care candidacy, prevention services allow Title IV-E agencies to claim more than administrative costs. Under FFPSA, Title IV-E agencies will be able to claim reimbursement for administrative, training costs, and eligible prevention services for eligible prevention services candidates. Title IV-E prevention services requires a redetermination process after the first 12 months.

Public Consulting Group published a [Summary of Claiming Traditional and Prevention Candidates Under Family First](#). See the Child Welfare Policy Manual section on [Candidates for Title IV-E foster care](#).

## Section 4: Prevention services

### 4.1 What placement prevention services are eligible for Title IV-E claiming?

FFPSA legislation requires prevention services to be trauma-informed, evidence-based and approved by the Title IV-E Prevention Services Clearinghouse. Eligible services support families with the goal of keeping children safely at home or with kin, with a focus on keeping families together. Services must address one of the following categories:

- **Mental health** prevention and treatment services provided by a qualified clinician
- **Substance abuse** prevention and treatment services provided by a qualified clinician
- **In-home parent skill-based services**, including parenting skills training, parent education, and individual and family counseling.

Services currently on the Minnesota’s Family First Prevention Services Act Title IV-E Five-year Prevention Plan include:

- Motivational Interviewing (MI), a well-supported, cross-cutting service
- Parents as Teachers (PAT), a well-supported, in-home parent skill-based service.

### 4.2 What are the criteria for evidence-based services?

Services must be rated and approved by the federal Title IV-E Prevention Services Clearinghouse to qualify for Title IV-E reimbursement. To be eligible for review by the Clearinghouse, services or programs must fall into at least one of the three service categories, be evidence based and have a written protocol (or manual) on how to administer a practice. Services that are reviewed will receive one of the four ratings: “well supported,” “supported,” “promising,” or “does not currently meet criteria” based on the extent of available evidence and the quality of studies completed for a service.

Review the [Prevention Services Clearinghouse Handbook of Standards and Procedures](#).

Review the [current services rated by the Clearinghouse](#).

### 4.3 Who can submit a service for review by the Clearinghouse?

The Clearinghouse will issue a public call for programs and services to review at least once annually. At that time, the public, including state or local government, Tribes, nonprofit and for-profit agencies, and community providers may request review of a service.

See the [complete review process](#).

#### **4.5 Will culturally specific or responsive services be added to the Five-year Prevention Services Plan and be IV-E eligible?**

Currently, there are few culturally responsive services that have been reviewed and approved by the Clearinghouse. Under FFPSA, only evidence-based practices approved by the Clearinghouse can be claimed for IV-E reimbursement. The Clearinghouse may approve additional culturally specific and responsive services in the future. Minnesota can resubmit its Five-year Prevention Services Plan with revisions to add identified culturally specific and responsive services. Equity is at the forefront of current and future planning around services.

#### **4.6 What if the approved services are not available in a specific area?**

Lack of services and resources is particularly evident in greater Minnesota. Department staff recognize a need to support expansion of community-based prevention services to increase accessibility to children and families across the state, including Tribal communities, through FFPSA and other initiatives. As prevention services are implemented, the department will continue community engagement to explore adding additional services to Minnesota's Five-Year Title IV-E Prevention Services Plan. Initially, the approved services will not be available statewide, but expansion will occur in future planning.

#### **4.7 Do prevention services include funding for housing or food insecurity?**

No. Housing and food insecurity do not fall into one of the eligible categories. Only mental health, substance abuse and in-home parenting programs are eligible for the 50% Title IV-E reimbursement. In January 2024, the FFPSA prevention services allocation was allocated to counties and federally recognized Tribes to provide prevention and early intervention services. At least 10% of the allocation must be used to provide services and supports to families. Concrete supports can include but are not limited to:

- Transportation costs
- Housing expenses
- Clothing and other necessities
- Gift cards.

The FFPSA prevention services allocation can be used to assist families with housing costs or to purchase food to address food insecurity. Read more about this [allocation here: Bulletin 24-68-02R Revised: Family First Prevention Services Act allocation](#).

## **Section 5: Kinship Navigator program**

### **5.1 What is a FFPSA kinship navigator program?**

The Family First Prevention Services Act (FFPSA), enacted as part of P.L. 115-123, allows states to receive reimbursement for kinship navigator programs that meet certain criteria. Eligible kinship navigator programs and services include those focused on assisting kinship caregivers in learning about, finding and using programs and services to meet the needs of the children and youth they are raising along with meeting their own needs.

Support services may include any combination of:

- Financial supports
- Training or education
- Support groups
- Referrals to social, behavioral or health services
- Assistance with navigating government and other types of assistance.

Review [federal program instructions](#) on requirements for the Kinship Navigator program. To review more information about the development of the Kinship Navigator program in Minnesota, visit [PartnerLink](#).

### **5.2 Can states implement kinship navigator models from other states?**

Yes. States may elect to implement kinship navigator models from other states if they meet the Clearinghouse requirements.

### **5.3 Has Minnesota selected a kinship navigator model at this time?**

Department staff have selected Foster Kinship originating out of Nevada as the state’s kinship model.

## **Section 6: Funding**

### **6.1 What needs to be in place for local agencies to receive Title IV-E prevention services reimbursement under FFPSA?**

Federal approval of a Five-year Prevention Services Plan is required. Minnesota’s Five-year Prevention Services Plan was approved by the federal government in January 2023. Work is currently underway for local agencies to be able to claim for Title IV-E prevention services. Specific claiming requirements include:

- Approval of prevention services by our federal partners as outlined in Minnesota’s Five-year Prevention Services Plan, such as Motivational Interviewing (MI) and Parents as Teachers (PAT)
- Prevention candidacy eligibility determination completed in SSIS by local child welfare agency (under development)
- A case plan that includes child-specific services, inclusive of prevention services requirements, must be completed by local agencies at the time of provision of MI or PAT (under development)
- Claiming functionality in SSIS for local agencies, Initiative Tribes and the department to report to our federal partners (under development).

SSIS release 23.4 included the prevention candidacy eligibility determination and new case plan, including new prevention services requirements, which are required for Title IV-E reimbursement under FFPSA.. The V24.1 release included Prevention Services BRASS Codes in SSIS Worker to claim for prevention services. The Prevention Services State Report (PSSR) was included in the SSIS v24.2 release. The PSSR is used by agencies to pull Title IV-E Prevention Services claims to submit to the state for reimbursement. For more information on the PSSR, view the SSIS job aid here: [Prevention Services State Report – May 2025](#).

## **6.2 What are examples of administrative costs related to prevention services allowable under FFPSA?**

The mechanism for claiming eligible administrative activities is through a federally approved time study. In Minnesota, there are time studies for county, Tribal and local collaborative staff. Child-specific administrative costs may be claimed from when a child meets eligibility criteria identified in a prevention plan until the end of the 12<sup>th</sup> month of an approved service being provided. If services are provided less than 12 months, allowable costs may be claimed to the end of the final month of service.

Allowable activities include:

- Development and maintenance of the child's placement prevention plan
- Verification and documentation of eligibility
- Referral to services
- Preparation for, and participation in, judicial determinations
- Case management and supervision
- Data collection and reporting
- Activities that are closely related to or similar to those listed at [CFR 1356.60\(c\)\(2\)](#).

Additionally, the department may claim administrative costs related to proper and efficient administration of the state's Five-year Prevention Services Plan. These administrative costs may be claimed beginning the first day of the fiscal quarter in which the state submits an approved plan including:

- Developing necessary processes and procedures
- Policy development
- Program management
- Data collection and reporting.

## **6.3 What are examples of administrative costs that are not allowable?**

Time spent completing a child protection investigation is not an allowable administrative cost. Additionally, physical examinations or mental health examinations through licensed providers cannot be claimed as administrative costs.

## **6.4 What are examples of training costs related to prevention services allowable under FFPSA?**

County and Tribal child welfare agencies who are serving eligible children and families under the prevention plan may be eligible to claim training costs. Training costs, such as how to identify and access appropriate services, how to provide selected services (such as Motivational Interviewing), how to oversee and evaluate ongoing appropriateness of services, and ongoing fidelity monitoring of prevention services, such as the utilization of LYSSN, are considered allowable costs.

## **6.5 Can prevention services not on the Title IV-E Prevention Services Clearinghouse be included in the state's prevention plan and be eligible for Title IV-E reimbursement?**

States may submit Five-year Title IV-E Prevention Services Plans with services that are not approved by the Clearinghouse. However, only services rated by the Clearinghouse as promising, supported or well supported are eligible for Title IV-E reimbursement.

## **6.6 What if a service included in Minnesota’s FFPSA Title IV-E Five-year Prevention Services Plan is already covered by Medicaid?**

Title IV-E is the payer of last resort, meaning if an individual eligible for services can have those services paid for by another private or public provider (such as Medicaid), that provider must cover the cost before Title IV-E reimbursement is used.

See federal guidance [ACYF-CB-PI-18-09](#) “I. Payer of last resort” (p. 12).

For information regarding prevention services requirements, contact [dhs.csp.safety@state.mn.us](mailto:dhs.csp.safety@state.mn.us).