

# Family First Prevention Services Act: Qualified Individual Programs

The Family First Prevention Services Act (FFPSA), passed in 2018, reformed federal child welfare law to prioritize keeping children safely with their families whenever possible. It also acknowledges that some children and youth in foster care may need short-term, high-quality residential treatment. When a child is in foster care, the goal is always to support timely, safe transitions back to their family.

To ensure this, FFPSA requires an independent Qualified Residential Treatment Program (QRTP) assessment before a child or youth is placed in this type of residential facility, or within 30 days, if placed urgently due to a crisis. In Minnesota, this requirement is outlined in [Minnesota Statutes 260C.704, subd. 26c.](#)

Foster care residence settings (formerly known as corporate foster homes) and residential treatment centers can become certified as QRTPs. These facilities must be licensed under Minnesota Statutes, Chapter 245A, or licensed/approved by a Tribal authority, and certified as QRTPs. An independent assessment is required for placements in these settings to qualify for federal reimbursement.

To meet this requirement for children in foster care, the Minnesota Department of Children, Youth, and Families (DCYF), along with county and Tribal social service agencies, implemented Qualified Individual (QI) programs. These programs ensure that QRTP assessments are conducted by trained, certified and independent professionals or community members called Qualified Individuals.

Under federal FFPSA regulations, local agencies use Juvenile Treatment Screening Teams (JTSTs) to recommend whether a QRTP placement is the most appropriate and least restrictive setting for a child. If the JTST recommends a QRTP, a Family and Permanency Team must be assembled. This team, which may include relatives, professionals and others close to the child, provides critical input to the QI during the assessment process and throughout the child or youth's QRTP placement. Their involvement helps ensure that any placement supports the child's emotional, behavioral or developmental needs and allows the child to stay connected to their family, community and culture during and after treatment.

When the Indian Child Welfare Act (ICWA) applies, county agencies must contact the child's Tribe immediately to provide the Tribe an opportunity to designate a QI. Agencies must also make reasonable and active efforts to include a Tribal representative on the Family and Permanency Team.

## County and Initiative Tribal social service agencies' Qualified Individual (QI) programs

County and Initiative Tribal social service agencies are responsible for creating and managing their own Qualified Individual (QI) programs. The respective county or Initiative Tribe must cover associated costs, except training and certification.

There are two options for county and Initiative Tribal agencies to develop a QI Program:

- Contracting directly with a community member; or
- Using a county or Tribal employee under a federal waiver.

Agencies may use any combination of a waiver and contracted QIs to support their program.

## Waiver for county and Tribal employees

The federal Children's Bureau has approved a waiver that allows certain county and Tribal employees to serve as Qualified Individuals (QIs) for QRTP assessments, provided they can maintain objectivity and independence in placement decisions, as required by [federal law \(42 U.S.C. 675a \(D\) \(ii\)\)](#).

Agencies have two waiver options for employees to be designated as Qualified Individuals (QIs):

- Waiver 1: designated agency employee outside of the child welfare system
- Waiver 2: designated agency employee per regional collaborative agreement between counties or Initiative Tribes.

For implementation guidance, agencies should refer to the [Qualified Individual \(QI\) Waiver Instructions for County and Initiative Tribal Agencies](#).

### **State-contracted Qualified Individual (QI) program**

The Department of Children, Youth, and Families (DCYF) has established a pool of Qualified Individuals (QIs) to complete assessments when county or Tribal agencies recommend placement of children in Qualified Residential Treatment Programs (QRTPs). The state-contracted QI program supplements and supports the requirement that county and Tribal agencies have their own QIs to comply with the Family First Prevention Services Act (FFPSA).

Agencies must complete and submit the [QI Request Form \(DHS-8415\)](#) to request a state-contracted QI. For more details on the referral and request process, please refer to the [Referral process for the state-contracted Qualified Individual program](#).

### **QRTP assessment requests**

The process for requesting a QRTP assessment depends on whether an agency has a locally contracted or waived QI, or needs to use a state-contracted QI. For locally contracted and waiver QIs, agency workers should follow their agency's QI request process. To request a state-contracted QI, agency workers must utilize the [QI Request Form \(DHS-8415\)](#) to submit their request to DCYF.

Regardless of the type of QI, agency workers must send the following documents to the QI, using their agency's encryption process:

- A completed QRTP Assessment Referral Form (available in SSIS under Participant/Documents)
- Level of care determination
- Names and contact information for all members of the Family and Permanency Team, including the child or youth.

### **Training and Certification**

All QIs must attend a mandatory two-day training provided by the Minnesota Child Welfare Training Academy (MNCWTA). This two-day (9 a.m. to 4 p.m.) virtual training provides trainees with policy and processes for completing the QRTP assessment, training on the Minnesota Brief Child and Adolescent Needs and Strengths (CANS) and CANS certification.

All QIs must obtain initial certification and annual recertification to administer the Minnesota Brief CANS and remain in a QI role. Note: A QI cannot perform the assessment functions without being certified to complete the CANS first.

For general information regarding the CANS assessment tool, visit the [Praed Foundation](#).

### Registering for Training

- June 17-18
- Aug. 19-20
- Oct. 14-15
- Dec. 9-10.

DCYF staff manage all registrations to ensure that only people who meet the requirements to become a QI attend the training. To register a new contracted or waiver QI, counties and Tribal agencies should send the QI's name and contact information to: [ffpsa.qualifiedindividual.dcyf@state.mn.us](mailto:ffpsa.qualifiedindividual.dcyf@state.mn.us).

### Qualified Individual portal

The [Qualified Individual portal](#) is a central location on the DCYF website where trained and certified QIs can find up-to-date announcements, forms, resources, and information to assist them in completing QRTP assessments. Upon completion of training and certification, QIs will receive access to the portal.

### Resources

[QRTP Assessment Flow Chart \(PDF\)](#)

[QI Request Form, DHS-8415](#) (to request a state-sponsored QI)

[JTST Practice Guide, DHS-8120A \(PDF\)](#)

[Family and Permanency Team Practice Guide, DHS-8120B \(PDF\)](#)

[QRTP Families Guide, DHS-8442 \(PDF\)](#)

[Qualified Individual Practice Guide \(PDF\)](#)

[Qualified Individual \(QI\) Waiver Instructions for County and Initiative Tribal Agencies \(PDF\)](#)

### Contact

For more information, please email [ffpsa.qualifiedindividual.dcyf@state.mn.us](mailto:ffpsa.qualifiedindividual.dcyf@state.mn.us)