

NUMBER

#22-68-09

DATE

September 16, 2022

OF INTEREST TO

County Directors

Social Services Supervisors and
Staff

Tribal Social Services
Supervisors and Staff

ACTION/DUE DATE

Please read information and
Implement

EXPIRATION DATE

September 16, 2024

Extended qualified residential treatment program (QRTP) placement reviews

TOPIC

Review of extended QRTP placements of children congruent with the Family First Prevention Services Act.

PURPOSE

Provide instructions and guidance for completing extended QRTP placement reviews.

CONTACT

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SIGNED



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Assistant Commissioner

Children and Family Services Administration

TERMINOLOGY NOTICE

The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services (DHS) supports the use of "People First" language.

I. Background

The Family First Prevention Services Act (FFPSA) amended the [Social Security Act, section 472](#), Title IV-E, on Feb. 9, 2018. Children’s residential services and placement requirements went into effect in Minnesota on Sept. 30, 2021. The Family First Prevention Services Act requires states to implement the Qualified Residential Treatment Program (QRTP) to ensure high quality residential treatment services for children placed in foster care. It is recognized that children and youth may require high quality residential treatment to meet their needs, when home-based services cannot be provided safely and successfully.

The Family First Prevention Services Act requires qualified individuals to conduct assessments to determine whether the level of care needed for a child meets requirements for placement in a QRTP.

Qualified individuals (QI) [[Minnesota Statutes, section 260C.007, subdivision 26c](#)] conduct assessments under [Minn. Stat. § 704](#), making recommendations regarding children/youth’s need for placement in Qualified Residential Treatment Programs. [[Minn. Stat. § 260C.007, subd. 26d](#)] When county or American Indian Child Welfare Initiative (Initiative) tribal agencies place children in a certified QRTP, one of the requirements is completing an extended QRTP placement review [[Minn. Stat. § 260C.714](#)] for long-term placements. [[475A\(c\)\(4\) of the Social Security Act](#)]

Extended QRTP placement review requirements apply to county social service agencies and Initiative tribes. The Minnesota Department of Human Services (department) implemented this requirement in conjunction with existing statutes. The following describes when an extended QRTP placement review is required, and who completes reviews.

II. Extended QRTP placement reviews

Timely extended placement reviews are a crucial part of FFPSA and continued Title IV-E reimbursement while children are placed in a QRTP. The purpose of completing an extended placement review is to determine the need for continued placement in a QRTP setting. Another key component of reviews is ensuring children are not remaining in a residential setting longer than necessary. When it is determined interventions and services can be provided safely in the community, or less restrictive setting, children should be discharged from a QRTP facility.

Extended placement reviews must be completed by the 180th, 360th, or 540th days of QRTP placement, as appropriate. Ensuring extended reviews are held timely maintains children’s eligibility for Title IV-E reimbursement.

A. Key factors

Children’s ages at the start of placement, length of time in placement, and consecutive/non-consecutive placements are key factors in determining when an initial or subsequent extended placement review needs to be completed.

Definitions

What is a consecutive placement?

During a continuous placement, children are placed in the same QRTP for more than 12 months for youth over age 13, or six months for those under age 13. When children move from one QRTP to a different one, the time for extended reviews result in non-consecutive timelines.

What is a non-consecutive placement?

During a continuous placement, children are placed in and out of the same or different QRTP settings for a total of 18 months for youth over age 13, and six months for those under age 13. If children (age 13+) are in the same QRTP for 12 months and move to a different one, or the same one, after 12 months the non-consecutive time frame applies.

Example – If a child (13) is placed in a QRTP placement for 8 months, returns home on a trial home visit for one month, they return to a QRTP (same or different)- an extended placement review will be due when the youth has been in a QRTP for a total of 18 months. In this example the extended review would be due when the youth has been in the second QRTP placement for 10 months, totally 18 months of QRTP placement in a continuous placement. While looking at a continuous placement, if all the QRTP placements were less than 12 months individually, the extended placement review is due when the cumulative time reaches 18 months.

If a child (13) is placed in a QRTP placement for 3 months, returns home on a trial home visit for one month, they return to a QRTP (same or different)- the child will meet the consecutive definition before the 18 month timeline if they remain in the second QRTP facility for 12 months. The extended placement review will be due at 12 months of placement, a child is due for an extended placement when they reach either the 12 month or 18 month timeline, whichever occurs first.

Age (at the time of entering placement)

Consecutive placement – during a continuous placement, when a 10-year-old is placed in a QRTP the first extended review is completed no more than six months in placement. If this child remains in a QRTP, the next extended review is in six months. If age 13 or older, a review is due at 12 months of continuous placement.

Non-consecutive placement – during a continuous placement, if a child age 12 is in a QRTP and moves to a second QRTP for a total of six months, it is a nonconsecutive placement and extended review is required. Alternatively, child age 12 is placed in a QRTP for three months, trial home visit occurs for six months and are placed back in the same or different QRTP for three months – extended review is required at six months, even if child turned 13. For those ages 13 or older, a review is completed at 18 months of time in QRTP placement.

Length of placement

The extended placement review dates are calculated in the Social Services Information System (SSIS) by the number of days. Six months is calculated at 180 days, 12 months at 360 days, and 18 months at 540

days. Extended placement reviews must be completed by the 180th, 360th, or 540th days of QRTP placement, as appropriate.

B. Preparing for SSIS entry of extended QRTP placement reviews

The director or designee of the responsible social service agency completes extended QRTP placement reviews. Federal guidance identifies the *head of the Title IV-E agency* as the individual to complete reviews. However, as noted in [ACYF-CB-IM-18-02](#) issued Apr. 12, 2018, this means county director or designee completes reviews.

Caseworkers receive a data clean-up message 30 days prior to the end of a review period (ex: 150, 330, and 510 days) stating an extended placement review is needed. To prepare for a review, caseworkers need to gather all necessary documentation supporting the need for continued placement in a QRTP. This documentation includes the most recent out-of-home placement plan, the last court report and court order. Additional information to be considered as part of this review includes, but is not limited to information from the QRTP family and permanency teams; discharge planning input from facility professionals, and other relevant information. Best practice is to assemble the family and permanency teams as part of the extended placement review process.

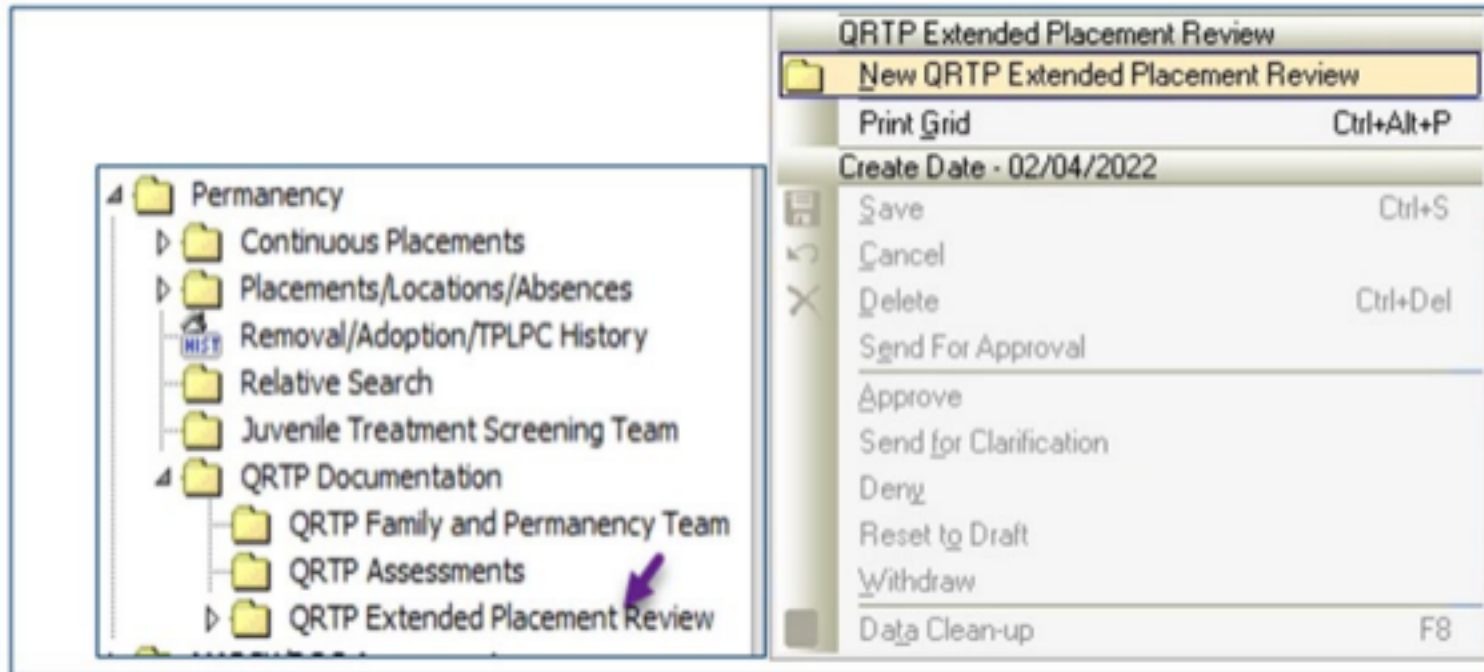
At a minimum, documents for an agency director or designee reviewing a QRTP placement is provided with evidence demonstrating the following, which is also submitted at each status review and permanency hearing:

- Strengths and needs of child continue to support a determination that their needs cannot be met through a less restrictive setting
- A QRTP provides the most effective and appropriate level of care consistent with short- and long-term goals, as specified in the permanency plan
- Specific treatment or service needs that will be met in placement
- Suspected length of time treatment or services is anticipated
- Efforts made to prepare child to return home, placement with a fit and willing relative, or a non-relative foster home.

C. Extended QRTP placement review entry in SSIS

To record the extended QRTP placement review, caseworkers initiate an SSIS entry under the new **Extended QRTP Placement Review** screen under the **Permanency Node – QRTP Documentation**, as noted below:

- Workers select **New QRTP Extended Placement Review** screen and complete the necessary fields.



QRTP Extended Placement Review

Create Date:

Review Status:

Worker:

Continuous Placement:

Current QRTP Placement:

Calculate Review Period Detail

Age at the Beginning of Review Period:

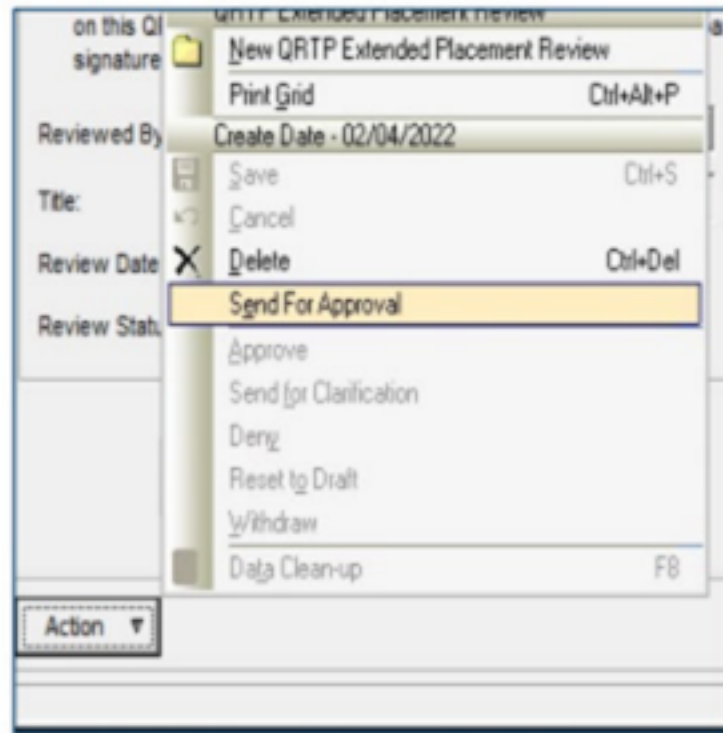
Review Type:

Review Period From: To:

In preparation for this extended placement review, the most recent Out of Home Placement Plan, the last court report, and court order were reviewed.

Additional information may be considered as part of this review, including, but not limited to, information from the QRTP Family and Permanency Team, discharge planning input from facility professionals, and other relevant information:

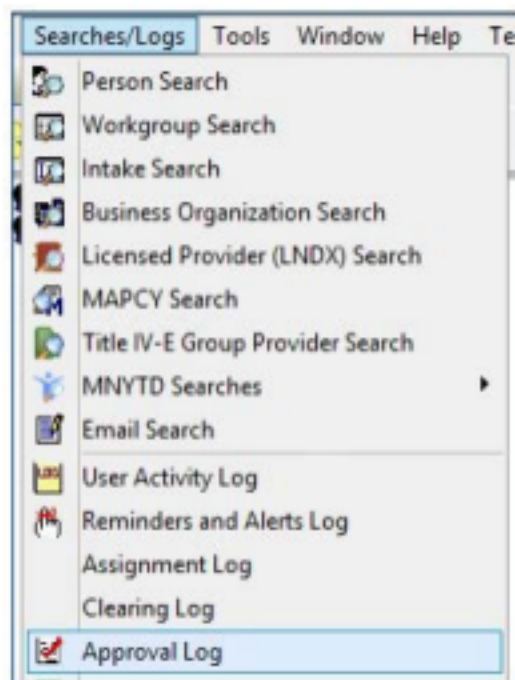
- When workers have completed all fields and are ready for approval, they select **Send for Approval**.



D. Extended QRTP placement review SSIS approval

After caseworkers initiate an entry and gather all relevant documentation, the information is reviewed and approved by agency administrator/director or designee with authority to approve QRTP extended placement reviews. The director or designee cannot be the same caseworker preparing a case for review. Federal guidance identifies the *head of the Title IV-E agency* as the individual to complete approvals. However, as noted in [ACYF-CB-IM-18-02](#) issued Apr. 12, 2018, this means county director or designee could complete approvals. This approval process must be completed by the 180th, 360th, or 540th days of QRTP placement, as appropriate.

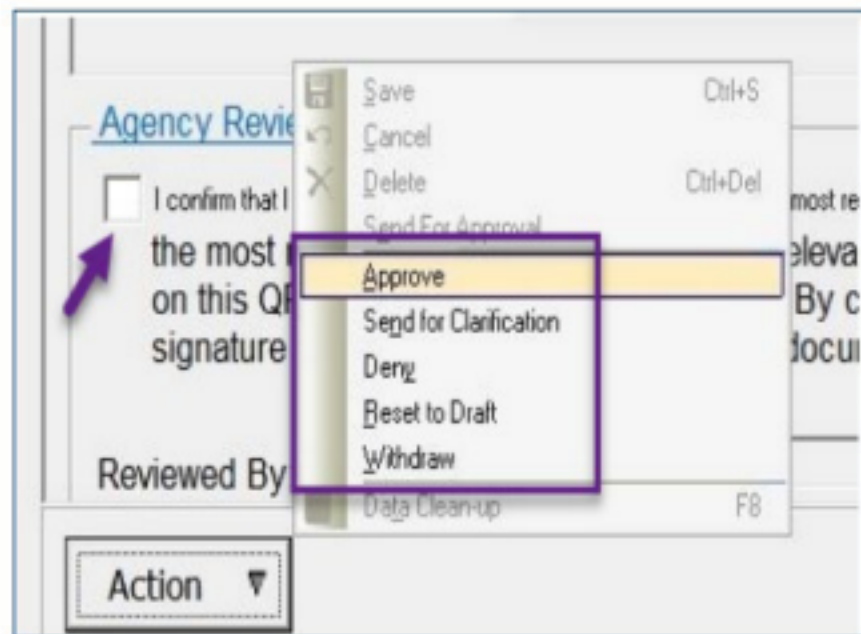
- Agency director or designee will navigate to **Searches and Logs**, selecting **Approval Log**.



- Under **QRTP Extended Placement Reviews**, the reviewer selects the review seeking approval and taken to the **Extended Placement Review** folder for that client.



- After reviewing all documentation, the reviewer can check confirmation of the review box to serve as an electronic signature, using the **Action** button to select the status of a review.



E. Resources

- [Q RTP Extended Placement Review Job Aid](#)
- [Q RTP Extended Placement Review video](#)
- <https://mnchildwelfaretraining.com/more/ffpsa/>
- [Social Service Information System](#) Resource page
- Federal Information Memorandum regarding Family First Prevention Services Act.
 - [ACYF-CB-IM-18-02](#)
 - [ACYF-CB-PI-18-07](#)

Americans with Disabilities Act (ADA) Advisory

This information is available in accessible formats for people with disabilities by calling (651) 431-4670 (voice) or by using your preferred relay service. For other information on disability rights and protections, contact the agency's ADA coordinator.