

Attachment F

Information for Tribes on Title IV-E Training Plans

Tribes that intend to submit a title IV-E plan to operate directly a foster care, adoption assistance and at the Tribe's option guardianship assistance program, are advised that in the future a title IV-E training plan will need to be combined with the title IV-B training plan, as required by 45 CFR 1356.60(b)(2). The following information is provided to assist Tribes in making plans for operation of a title IV-E program. **Tribes are not required to submit the title IV-E training plan with the CFSP due on June 30, 2009**, but if approved to operate a title IV-E program will be required to submit such information prior to submitting claims under title IV-E for reimbursement of allowable training costs.

Federal regulations at 45 CFR 235.63 through 235.66(a) describe the conditions under which Federal matching funds are allowable. Among the conditions to be considered are the trainees toward whom the training is directed (including its specific relevance to the identified administrative activities allowable under Title IV-E), the scope and duration of the training and the sources of non-Federal matching. Further, Federal requirements governing the cost sharing for training activities among all benefiting programs and funding sources are discussed generally in OMB Cost Principles at A-87, and more specifically in the Children's Bureau Child Welfare Policy Manual at http://www.acf.hhs.gov/programs/cb/laws_policies/index.htm#policy. Questions specific to training are located in the Child Welfare Policy Manual at 8.1H.

Elements that will need to be included in a Tribes' title IV-E training plans in order to be considered eligible for Federal financial participation (FFP) include:

- A description of the initial in-service training program for new or reassigned employees that includes a description of the content and scope of the classroom and work experience components of the training, as well as the duration of the initial in-service training period and the specific supports provided during this period.
- For all types of training (e.g., individuals preparing for employment, initial in-service, ongoing in-service training, foster/adoptive provider training, and the new categories of short-term training authorized by P.L. 110-331) including the following:
 - a brief, one-paragraph syllabus of the training activity;
 - indication of the specifically allowable title IV-E administrative functions the training activity addresses;
 - indication of the setting/venue for the training activity;
 - indication of the duration category of the training activity (i.e., short-term, long-term, part-time, full-time);
 - indication of the proposed provider of the training activity;

- specification of the approximate number of days/hours of the training activity;
- indication of the audience to receive the training (see discussion above expanding the list of eligible trainees);
- description of estimated total cost; and
- cost allocation methodology.

P.L. 110-351 amended section 474(a)(3)(B) of the Act to create new trainee groups under title IV-E. Tribal Title IV-E agencies will be able to claim the costs of short-term training of relative guardians provided the Tribe has opted in its title IV-E Plan to provide kinship guardianship assistance payments to relatives; staff members of Tribal-licensed or Tribal-approved child welfare agencies providing services to children receiving title IV-E assistance; staff members of child abuse and neglect courts; agency attorneys, attorneys representing children or parent; guardians ad litem, or other court-appointed special advocates representing children in proceedings of such courts, in ways that increase the ability of such current or prospective parents, guardians, staff members, institutions, attorneys, and advocates to provide support and assistance to foster and adopted children and children living with relative guardians, whether incurred directly by the Tribe or by contract. The FFP rate of Federal reimbursement for such training costs changes each year over a five-year period, as follows: 55 percent in FY 2009; 60 percent in FY 2010; 65 percent in FY 2011; 70 percent in FY 2012; 75 percent in FY 2013 and thereafter (section 203(b) of P.L. 110-351). The title IV-E training plan will need to identify whether and how the agency will train persons in these new trainee groups consistent with the elements above.