

Child Welfare Policy Manual

Questions & Answers

3.1H INDEPENDENT LIVING, Certifications and Requirements, Training

1. Question: What funds under section 477(b)(3)(D) of the Social Security Act (the Act) will be used for training the individuals listed there and whose responsibility is it to train them?

Answer: The certification at section 477(b)(3)(D) of the Act requires the State or Tribe receiving Chafee funds to train the categories of people enumerated therein and to utilize the funds that are available for this purpose. The funds specified at section 474(a)(3) of the Act are the administrative dollars which can be claimed for such training. Under that section of the Act, the cost of training certain individuals is reimbursable from title IV-E administrative funds at the rate of up to 75 percent Federal Financial Participation (FFP). If the State/Tribe with an approved title IV-E plan contracts with private entities to perform case management functions, it may claim the percent reimbursement permitted by statute for training the contractor's staff to perform the contracted functions. The certification for training in the Chafee Program simply adds independent living training to the pool of allowable title IV-E training activities; it has no general impact on the FFP match for training costs. In addition, regulations at 45 CFR 1356.60(b)(2) require that all training activities and costs funded under title IV-E shall be included in the title IV-E agency's training plan for title IV-B.

- **Source/Date:** Questions and Answers on the Chafee Foster Care Independence Program; revised 08/31/09; (3/28/2019)
- **Legal and Related References:** Social Security Act - sections 474(a)(3), 477(b)(3)(D), and (j); 45 CFR 1356.60(b)(2)

2. Question: Does the law permit training to be directly charged to title IV-E or must the training costs be cost allocated?

Answer: States and Tribes receiving Chafee funds should treat independent living training for foster parents, adoptive parents, case managers and workers in group homes on independent living issues like any other training costs under title IV-E and allocate appropriately.

- **Source/Date:** Questions and Answers on the Chafee Foster Care Independence Program; revised 08/31/09
- **Legal and Related References:** Social Security Act - sections 477 and 474; 45 CFR 235, 45 CFR 1356.60

3. Question: May States claim the costs of training foster parents under their Chafee Program funds?

Answer: No. The certification at 477(b)(3)(D) specifies that States "will use training funds provided under the program of Federal payments for foster care and adoption assistance" to provide training including training on youth development to help foster parents, adoptive parents, workers in group homes, and case managers understand and address issues confronting youth preparing for a successful transition to adulthood and making a permanent connection with a caring adult. Since the statute expressly directs that title IV-E administrative funds be used for training, Chafee funds are not permitted for this use.

- **Source/Date:** 7/25/02; (3/28/2019)
- **Legal and Related References:** Social Security Act - section 477(b)(3)(D)